

16 September 2022

Melissa Bray
Assistant Secretary, Advice and Investment Branch
The Treasury

FinancialAdvice@treasury.gov.au

Dear Ms Bray,

Financial Adviser Education Standards – Consultation Paper

I thank you for the opportunity provided to VETASSESS to contribute to this consultation on Financial Adviser education standards.

VETASSESS is the largest skills assessment body in Australia supporting skilled migration in more than 350 professional and trade occupations. Our assessments cater to a wide range of temporary and permanent visas, and we have been the trusted partner of the Department of Home Affairs and the Department of Employment and Workplace Relations to support their skilled migration schemes and onshore skills recognition needs for recent migrants. Outside migration, VETASSESS also provides skills recognition services for local professionals and trades as well as education consultancy to Australian Commonwealth and State governments and international governments.

This discussion into refining the educational standards for Financial Advisers comes at a critical juncture for the industry given the closing down of FASEA and the transition to direct Treasury leadership on advisers' qualification requirements. VETASSESS was pleased to be the trusted partner for FASEA in developing their assessment process for overseas qualifications. We provided a bespoke qualification referencing service for advisers with overseas qualifications, which saw nearly 200 of our skilled migration applicants referred to FASEA on the basis of VETASSESS views on their qualification levels.

At this point, we are delighted to provide further input on this topic, particularly in relation to how overseas qualifications possessed by advisers should be regarded and assessed. I am pleased to submit VETASSESS' input towards this consultation and VETASSESS will be more than happy to provide more information or respond to any queries arising from our submission.

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We look forward to hearing more from the Treasury on this topic.

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Introduction

As recognised experts in assessments, VETASSESS provides its clients with independent, rigorous and efficient assessment services that are responsive to both client needs and the needs of the Australian labour market. Since its establishment as a government enterprise in 1997, VETASSESS has provided national, international and government clients with services ranging from skills assessments for people seeking to migrate to Australia, through to competency assessments against national Vocational Education and Training (VET) qualifications, and assessments of people seeking to enter specific occupations and organisations. Our clients include individuals seeking to have their skills assessed and/or recognised, as well as government departments, service organisations and private enterprises, on whose behalf we develop and conduct assessments. The years and scope of our experience in providing assessment services has enabled us to develop a depth and breadth of knowledge and expertise beyond that of other assessing organisations. This, in combination with the longevity of many of our client relationships, has led to VETASSESS becoming recognised, highly regarded and respected as a leading assessment partner of choice.

VETASSESS is the largest assessing authority in Australia supporting the Australian skilled migration program. We are authorised to offer pre-migration skills assessments across more than 350 professional and in 28 trade occupations, to enable individuals to apply for permanent or temporary migration to Australia. We are known for:

- assessors who have in-depth knowledge and expertise across a very wide range of occupations, countries and educational qualifications, enabling them to make valid assessments of candidates' qualifications and work experience against an up-to-date understanding Australian labour market and migration requirements
- the reliability and integrity of our assessment processes, with clients holding in high regard our integrity checks and other quality assurance processes,
- providing a quality service to candidates, with online application and reporting processes and access to prompt, personalised advice and feedback throughout the application process.

The VETASSESS response to this consultation paper is limited to two questions – question 10 from the Experienced Pathway set of questions, and question 8 from the Formal Education and Exam set of questions.

Experienced Pathway – Q10

For existing advisers not eligible for the experienced pathway but who have a foreign qualification at AQF 7 level or above, is it practical and appropriate for education providers or licensees to assess how these qualifications meet the education standard and what additional study may be required, rather than the Minister? Why/why not?

If Financial Advisers need to undertake additional study in Australia, that study would be through qualification that are covered by the Australian Qualifications Framework. For example, that further study may be through a Certificate IV, Diploma, or Bachelor-level course. However, overseas study does not always map directly on to the AQF. Hence caution is required in assuming that overseas qualifications will easily intersect with the AQF and can be related to AQF qualifications.

In many instances, specialised assessments are required of overseas qualification, in order to determine the appropriate pathway for further study aligned with the AQF.

As a specialised assessment provider, VETASSESS qualification assessments against the AQF are undertaken by referencing the Country Education Profiles (CEP) published by the Department of Employment and Workplace Relations (formerly by the Department of Education, Skills and Employment). These guidelines indicate whether an overseas qualification should be assessed at a particular AQF level, or whether qualifications are comparable to the AQF at all.

The process of comparison is complex in some cases, and the appropriate AQF level of a qualification will vary depending on its duration, the awarding body's accreditation status, the breadth of study, and other factors.

For example, Bachelor degrees from the Indian Subcontinent may vary in AQF level between Certificate IV, Diploma, Associate Degree, or Bachelor Degree level, or may require a case-by-case assessment. Such case-by-case assessments require specialised knowledge of relevant countries' education systems, course structures, and qualifications frameworks.

In conclusion, mapping overseas qualifications to the AQF requires specialised skills and knowledge in many cases.

Formal Education and Exam – Q8

Is it practical and appropriate for education providers or licensees to also evaluate foreign qualifications against the new core knowledge areas and assess what additional study may be required, rather than the Minister? Why/why not?

Similarly to question 10 above, while education providers or licensees may have detailed knowledge of the *content* required for Financial Advisers, in order to determine the comparability of overseas qualifications, and hence what further study aligned with the AQF may be required, it is important to consider the complex issues that relate to how overseas qualifications compare to the AQF, as detailed above.