

10th February 2023



Women in Adult and Vocational
Education (WAVE) &
Equality Rights Alliance (ERA)

RESPONSE TO JOBS AND SKILLS AUSTRALIA DISCUSSION PAPER



Acknowledgement

Women in Vocational and Adult Education (WAVE) acknowledge the traditional owners of our lands and waters – the Aboriginal and Torres Strait Islander Peoples – who are the first educators and the first teachers of this land.

We pay our respects to elders, past present and emerging and recognise that these lands and waters have never been ceded.

We support truth, treaty and reconciliation and the Uluru Statement of the Heart.

Always was, always will be Aboriginal land.

TABLE OF CONTENTS

Acknowledgement	2
Table of Contents.....	3
Executive Summary and Recommendations.....	5
Recommendations	5
Key Contacts:	6
WHO is ERA?.....	7
Who is WAVE?	7
Our Way of Working	7
Context of our feedback	8
A note on international frameworks and agreements	8
Process to develop this submission	9
Response to Key Questions in Discussion Paper	10
Structure and governance	10
Q1: Are there other design considerations that could further strengthen Jobs and Skills Australia’s ability to provide advice to government?	10
Structure and Governance.....	12
JSA as Jobs and Skills Council for Education and Training Sectors.....	13
Functions.....	15
Q2: What principles could be used to guide Jobs and Skills Australia’s priorities, and the development of its workplan?	15
Stakeholder Engagement.....	16
Q3: How could Jobs and Skills Australia seek broader input into the development and refinement of its workplan?	17
Q4: How could Jobs and Skills Australia engage tripartite partners, experts, and other interested parties in its major studies?	19
Q5: What new information should Jobs and Skills Australia be collecting through its engagement to build a stronger evidence base?.....	20
Use of Disaggregated Gender Data and evaluate practice.....	20
Equity in our Education and Skills System	20
International Practice.....	21
Functions and ways of working	22
Q6: How can Jobs and Skills Australia expand its engagement with a broader range of skills and industry stakeholders in its work?	22

Q7: What types of outreach could Jobs and Skills Australia use to increase visibility and use of its products and advice? 23

 Communicate what JSA is and does. 23

Q8: How could Jobs and Skills Australia present its data and advice to aid stakeholders in informing their needs? What formats could better inform your work? 24

WAVE Glossary of Terms 25

EXECUTIVE SUMMARY AND RECOMMENDATIONS

As articulated at the 2022 Jobs and Skills Summit, the Australian economy is not broken, it is just not working for women. Women are not underutilised – they are working harder than ever – they are just not being paid accordingly, and in some settings are not even invited to the table. Their work is undervalued and, in some instances, devalued because it is done by a woman.

At the Jobs and Skills Summit, the failure of our employment and education pathways to support and maintain employment for women was identified as a key area for reform. Following the Summit, a commitment was made to [*“ensure ... equal opportunities for women are central objectives of the government’s economic and fiscal policy.”*](#) That commitment needs to be reflected in the aims and structures of JSA.

JSA is being developed in response to perceptions that both the current workforce and education pathways are broken in a number of fundamental ways.

Limiting the JSA’s focus on women and people of diverse genders to actions which address the needs of a ‘cohort’ will fail to produce the structural reform needed to fix broken pathways.

JSA must aim to produce pathways to employment and education which work for women and people of diverse genders if it is to be successful in addressing the flaws in the current pathways. The only way to do this successfully is to identify the structural changes needed by conducting gender impact analysis across the work of the organisation.

In an environment where the government has [committed to gender responsive budgeting and the progressive application of gender impact analysis to all policy](#), it would be short sighted if JSA was established without a core commitment to intersectional gender impact assessment across its functions.

Recommendations

Throughout this submission WAVE and ERA provide a range of recommendations (numbered throughout) in response to the questions pose. In summary we advocate and recommend that: JSA should:

- I. Establish Governance and Advisory Structures that centre the lived experience of all users of our education and training system
- II. Establish and support high level advisory committee on Equity and Equality
- III. Establish a permanent ongoing Deputy Commissioner role, focused on Gender Equity and Inclusion that is resourced to delivery equity outcomes
- IV. Be the Jobs and Skills Council for the Australian Education and Training sectors.
- V. Work to a set of principles and criteria that centre equity and equality in the work systems and structures of JSA, rather than it being an “add on feature” (that is through its work planning processes, product development, communications, research, measurement and impact indicators, and advice)
- VI. Adopt process used to develop priorities and workplans that is based on a set of conditions to ensure diverse input, that centres the lived experience of the national education and training system’s users, students and workforce, first and foremost

- VII. Undertake a gender impact assessment on its consultative and engagement policy and protocols. This assessment would inform JSA on what engagement practices and processes to work to that would maximise its engagement with a broader set of stakeholders and is a globally recognised approach to engaging stakeholders to inform equality.
- VIII. Adopt an engagement approach that seeks to connect directly with community through outreach, to learn and collect data on the lived experience of all end users of our education and training system with a particular focus on those voices that have not been heard in the past (as demonstrated through inequitable access. This will require JSA to undertake road shows, capability building and listening webinars, community conversations with partners, and other activities that would more strongly connect the agency with the systems and structures that it needs to engage with in order to achieve truly equitable skills and training solutions for all Australians.
- IX. Enact a tripartite structure that includes education and community experts.
- X. Undertake a program of work to address the gender inequity in the education and training system (as reported through WGEA and the Victorian Government’s Commission for Gender Equality in the Public Sector).
- XI. Develop programs of work with international partners to internationally benchmark its work and the progress of Australia’s education and training system’s key indicators (including equity, translation of education to workforce participation, addressing inter-generational unemployment, etc).
- XII. Consistently and congruently communicate how it differs from existing structures.
- XIII. Undertake work to build the capacity and capability of the education and training system to use and translate JSA’s products and services into their practice.

Key Contacts:

National Co-Convenor

Kit McMahon

Women and Vocational Education and Training

E: wave@wave.org.au

Convenor

Helen Dally-Fisher

Equality Rights Alliance

E: era@ywca.org.au

WHO IS ERA?

Equality Rights Alliance (ERA) is Australia's largest network of organisations advocating for women's equality, women's leadership and recognition of women's diversity. We bring together 67 non-government organisations and social enterprises with a focus on the impact of policy or service delivery on women.

ERA started life as WomenSpeak, a national non-government network of women's organisations and women's advocates which operated from 2001 to 2010.

Equality Rights Alliance is one of six National Women's Alliances. We are funded by the Commonwealth Government's Office for Women and are led by YWCA Australia

ERA believes the advancement of women and the achievement of equality are matters of fundamental human rights. We advocate for gender equality, women's leadership and government policy responses that support women's diversity. Using a range of methods to consult and engage with women in Australia, ERA works to bring the voices of women from diverse life situations to policy makers.

WHO IS WAVE?

WAVE is a national network of women involved in Vocational Education and Training (VET) and adult education. WAVE provides research, policy advice and advocacy to Australian and State/ Territory Governments on gender equity in skills and adult education policy, and provides input into VET and adult education internationally. We are supported within each state by local representatives who, in turn, contribute collaboratively to national events and governance. Formed in 1985 WAVE is the first and only national independent, non-government organisation for Australian women and girls in the adult, community and vocational education and training sector/s.

Our mission is to advocate so that Australia's vocational education and training and adult education systems are equitable for all women and girls. Our vision is for a future where women and girls can participate fully in all aspects of work and democratic society, through equitable and transformative vocational and adult education.

Our Way of Working

WAVE undertakes its work within a feminist framework recognising that intersecting forms of discrimination and marginalisation can impact a person's capacity to access and benefit from Australia's vocational and adult education system/s. As such, WAVE is keenly aware of the importance of centring lived experience in our work. We advocate for the vocational and adult education system to enhance its inclusivity, relevance and affordability for those who may be left behind to provide a coherent voice for under-represented, vulnerable and marginalised groups.

The transformative power of inclusive education, training and lifelong learning that centre gender equity is at the core of WAVE's values.

As leaders in the areas of gender equity and vocational and adult education, WAVE is uniquely placed to provide expert advice to Australian and State/Territory Governments on ways that these systems can be equitable for all Australians. We can provide partners, members and stakeholders with deep understanding of the last 40 years of evidence in VET and adult education and gender equity from Theory of Change to Theory of Action and monitoring and evaluation of results.

We work in collaboration and in partnership with organisations, leaders and communities that share an appreciation of the breadth of challenges associated with gender inequity, especially as they relate to Australia’s national adult education and skills system/s.

WAVE’s mission is to partner with organisations and individuals with a shared commitment to social justice in the co-production of sound research and advocacy.

Context of our feedback

In keeping with the global practice on intersectional gender equity, and the evidence of both the economic and social returns that equitable approaches deliver, we ask the Australian Government to apply an intersectional gender lens to its reviews of current Foundation Skills policies and programs.

By applying an intersectional gender lens across all aspects of its work, the Australian Government will:

- Emancipate available labour to engage in the workforce in a way that is meaningful for community, individuals, our society and economy
- Reveal opportunities to enable transformational change in our communities that are in keeping with our nation’s commitment to human rights
- Demonstrate that gender equality is at the heart of the Australian Government’s vision for a better future; that it is committed to restore Australia’s leadership on gender equality.
- Increase our standing internationally as a leader in human rights, and in creating equitable economies that are productive and sustainable

A note on international frameworks and agreements

In putting forward these points we draw from the evidence of such organisations as the United Nations, UN Women, UNESCO, UNESCO-UNEVOC, the World Bank, major consultancy firms such as KPMG and PwC, and significant research institutions internationally including our own Group of 8.

WAVE supports Australia’s commitment to the UN’s *2030 Agenda for Sustainable Development* (Agenda 2030) and the Sustainable Development Goals (SDGs) along with its central tenet of ‘leave no one behind’. Our work is informed especially by SDGs 5 (Achieve gender equality and empower all women & girls); 4 (Ensure inclusive and equitable quality education and lifelong learning opportunities for all¹), and 8 (Promote sustained, inclusive and **sustainable economic growth**, full and productive employment and **decent work** for all).

Similarly, we acknowledge Australia’s support of the *Marrakech Framework for Action: harnessing the transformational power of adult learning and education* (MFA) agreed at CONFINTEA VII and, in line with UNESCO’s global initiative *Futures of Education* and calls for a new social contract for education², the commitments made in Australia’s submission at the Transforming Education Summit

¹ SDG4 is supported by 10 targets & 11 indicators. Those that are relevant to VET and adult education are targets 4.3 - 4.7.

² See: UNESCO *Futures of education* for detail & associated publications <https://en.unesco.org/futuresofeducation/>

(TES) convened in September 2022 in response to a global crisis in education. The *National Statement of Commitment*³ states (in part):

Australia recognises the power of education to transform lives and, through targeted actions and continuous improvement, is committed to meeting Sustainable Development Goal (SDG) 4 as a global benchmark for ensuring inclusive and equitable access to quality education and promoting lifelong learning. ...

To respond to current and emerging skills needs, Australia recognises the need to support equitable access to lifelong learning, including formal learning such as higher education and vocational education and training, as well as informal and non-formal learning. Lifelong learning has an important role in helping disadvantaged community members, for example, through improving adult literacy and numeracy, and developing digital literacy (pp. 1,2).

We also endorse the range of advice and advocacy from gender equity colleagues internationally, reflected in major policy frameworks in the European Union and in countries such as Canada, Germany and the United States all of which have a nation-wide gender equity framework, policy and impact/measurements system resourced to drive accountability, build capability and enable transformational change. Noting the scope of our role, we will contain our feedback to that relating to the national adult education and VET systems.

Process to develop this submission

In putting this submission together WAVE and ERA drew upon previous evidence and data that have been shared with the Federal Government on gender equality, intersectionality and economic, social and skills policy.

We also engaged with our members and held a forum on the 2nd of February 2023, online where some 36 participants from a range of organisations across Australia met, to respond to the questions raised in the discussion paper. The drafts of the submission were then shared with participants at this forum for validation and further feedback.

³ Australian Government (2022) *National Statement of Commitment to Transform Education*. 14th October 2022
<https://transformingeducationsummit.sdg4education2030.org/AustraliaNationalStatement>

RESPONSE TO KEY QUESTIONS IN DISCUSSION PAPER

Structure and governance

Q1: Are there other design considerations that could further strengthen Jobs and Skills Australia's ability to provide advice to government?

Yes - there are other design considerations that could further strengthen Jobs and Skills Australia (JSA) ability to provide advice to government.

As a first step WAVE and ERA **recommend (I)** that JSA should have governance and advisory structures that are designed to centre lived experience of all users including students/trainees/apprentices as business/employers as well as industry peak bodies.

International experience and experience here in Australia is continuously seeking to centre lived experience of those users of whom the service or system seeks to support. By this we mean, all end users with a variety of experiences and pathways that they undertake. We argue that presently the advice and policy mechanisms of Australian education and training practice do not do this well and, in some instances, discriminate against some voices, to privilege others. While acknowledging the vital role of industry, Jobs and Skills Councils (and their predecessors) tend to centre the needs and experiences of one voice industry - as defined by employers and employees.

Without that, truly centring lived experience, Australia's national education and training systems risks remaining inequitable and blind to gender-related issues and barriers. **In practice, that means the agency is continuously engaging stakeholders on the ground and partnering with users to ensure that social, labour market and economic goals dovetail.**

If the goals of JSA are to be a "source of truth so that its advice can better inform government policy, programs, and investment" (DEWR Newsroom 26 October 2022) and "help the Australian Government improve employment opportunities and economic growth" (Jobs and Skills Australia Website "About Us" <https://www.jobsandskills.gov.au/about>) then the agency needs to hear about the experiences and voices of those in our community who face intersectional disadvantage particularly when it comes to education and employment. Evidence that ERA, WAVE, and others have provided to the Federal Government (and summarised further on) show that this is women of all working ages, those from migrant/refugee backgrounds, those with a disability, Aboriginal and Torres Strait Islander peoples, LGBTQI+ young women, and older women.

As previously advised, there are good examples for JSA to draw on, where policy approaches and documents have integrated the lived experience of people the policy is designed to support:

- the National Strategy to Stop Violence against Women,
- the work to establish constitutional recognition of Aboriginal and Torres Strait Islander Peoples through the Voice, and

- the work across Government portfolios to ensure that the end user of policies and programs is brought front and centre of policy design – for instance the redesign of governance and advice in the NDIS.

This same approach must occur at JSA to ensure that this agency can fulfill its mandate around equity and inclusion - realising its own goals as agreed to by state and federal levels of government, so JSA can:

ensure that all Australians — particularly women, First Nations Australians, young people, mature age Australians, those experiencing long-term unemployment, people from culturally and linguistically diverse communities, people with disability, and regional and remote learners — have access to the education, training and support needed to obtain well-paid, secure jobs

ensures that no Australians are left behind as the Australian economy transitions and adapts to structural change, including by providing opportunities for life-long learning and foundation skills development

Australian Government (2022), National Skills Agreement: Vision and Principles. 31st. August 2022. Department of Employment and Workplace Relations, Canberra. <https://www.dewr.gov.au/skills-reform/national-skills-agreement-vision-and-principles>

Previous submissions from both WAVE and ERA to the Australian Government provide detailed evidence and data demonstrating the prevalence of intersectional gender inequity in our national education and training system, as well as provided examples of how this can be addressed.

This inequity lies in the gendered experience of students in education and skills system, the funding that is inequitable between male dominated skills pathways and female dominated skills pathways (reinforcing negative attitudes norms and behaviours to feminised industries, and significantly contributing to Australia’s gender segregated labour markets) as well as the inequity of the education and training workforce itself.

We refer the Department to the following publications:

- WAVE’s submission to the Employment and Jobs Summit White Paper – <https://wave.org.au/calls-to-make-our-national-skills-system-equitable-in-the-forthcoming-employment-white-paper/>
- ERA’s 2 minute intervention at the Jobs and Skills Summit – <https://www.equalityrightsalliance.org.au/era-at-the-jobs-and-skills-summit/> and submission to the Employment White Paper <https://www.equalityrightsalliance.org.au/publications/employment-white-paper-era-submission/>
- ERA’s submission on Valuing Work and Care for the Senate Select Committee on Work and Care <https://www.equalityrightsalliance.org.au/publications/eras-submission-on-work-and-care-valuing-all-of-womens-work/>
- WAVE’s submission on Australia’s Migration System – Calls for Skills Migration to have gender equitable foundation <https://wave.org.au/wave-calls-for-future-migration-strategy-to-be-gender-equal/>

- WAVE’s response to the Australian Apprenticeships Service and Support Discussion Paper <https://wave.org.au/response-to-the-questions-outlined-in-the-australian-apprenticeship-services-supports-discussion-paper/>
- WAVE Response to Future Delivery of Foundation Skills in Remote Australia Discussion Paper <https://wave.org.au/advocacy-and-lobbying/>

In summary, the above submissions and policy contributions urge an intersectional lens and gender-responsive measures so women (and therefore all sex and genders, given visible and invisible biases) can access secure and well-paid jobs, education, and training systems. That involves the following steps:

- Understand and know the prevalence of gender inequity in our education and skills system, and, how the education and skills system and structures continue to reinforce this inequity, both within the skills system, and contribute to inequity in our labour markets.
- Put equity at the centre of the reforms and the reformed education and training system, rather than adding equity/equity policies as an “afterthought”
- Defining and developing policy using gender based disaggregated data that enables the Australian Government to understanding the gendered drivers of inequity that are present in our education and training system as well as measure the impact that our system has to addressing gender inequity
- Undertake root and branch reform of our education and skills system
- Build the capability and capacity of our education and training systems and people to address intersectional gender inequity within their own practices

Structure and Governance

Looking back over the last four decades of education and training policy, it is well recognised that equity – including gender equity - is one of the last key matters to be addressed. International evidence, policy and practice demonstrates that it is vital that equity addressed for national education and training systems to deliver to their mandates of workforce participation, economic productivity and, social inclusion. (Please refer to forthcoming paper by Elaine Butler and Fran Ferrier NCVER 2022 “A Fair Go for All?: Landmark Documents and Equity Frameworks in Australian Vocational Education and Training”)

WAVE and ERA highlight that the Australian National Training Authority saw the importance of addressing gender inequality but failed to deliver to this commitment. (Please refer to forthcoming paper by Butler, Elaine & Ferrier, Fran (2023), *A fair go for all? Equity frameworks and landmark documents in Australian vocational education and training*, VET Knowledge Bank, NCVER, Adelaide. <https://www.voced.edu.au/vet-knowledge-bank-landmark-documents-equity-access-historical-overview>

WAVE and ERA further **recommend (II & III)** that JSA:

- A. Establish and support an ongoing high-level advisory committee on Equity and Equality drawing upon the model as used by the National VET Equity Advisory Council (please refer to <http://www.ivet.com.au/a/298.htm> I) but applied across the broader education and training remit of JSA. This committee would need to develop a theory of change framework that informs the work of JSA from an equality and equity perspective.

- B. Has a permanent ongoing Deputy Commissioner to drive intersectional gender equity practice and policy design across the JSA agenda and work (a Deputy Commissioner for Equity and Equality as it were). This role would be the key indicator of JSA endorsing and supporting the Committee (as per A).
- C. The role of Deputy Commissioner will, among other things:
- Generate data and analysis of the national skills system using gender and intersectional disaggregated data as well as enable the commission research that has an intersectional gender lens.
 - Build capacity and capability of key stakeholders within the National Training System to apply intersectional gender lens to their work, structure, decision making and outcomes. This may include working with Workplace Gender Equality Agencies (WGEA) and other state and territory agencies to support the creation of intersectional gender equity in jurisdictional education and training systems. This recommendation acknowledges the reality that Australia's education and training sector is not gender equitable (as reported by WGEA and data produced through Victoria's Commission for Gender Equality in the Public Sector insights portal).
 - Has an advocacy role informed by intersectional gender equality practice. To achieve intersectional gender equity, agencies and organisations need to employ and work with resources that can advocate for gender equity – an important component of any plan to drive change and communicate the value of gender equity across complex systems.
 - Act as the key conduit for JSA to work collaboratively with other key agencies and parts of government infrastructure that are charged to build gender equity (for instance the Office for Women, Women's Economic Taskforce)
- D. Establish Key Performance Indicators to measure and report on outcomes of its work against its impact to drive intersectional gender equity across the national training system.

The above structures would strengthen JSA's role in providing advice to government through:

1. Recognition of the reality of inequity in our society and economy.
2. Provision of a broader range of strategies and ways that our national training and education systems can contribute to lifting national productivity and social inclusion.
3. Advice that is not siloed from other systemic and structural changes being undertaken by the Australian Government and enable JSA's work to leverage and partner with other reform (such as The Voice, Gender Equality Strategy and employment services).
4. Advice informed by a close understanding of the capacity and capability of the national education and training system to address intersectional and gendered barriers to participation.

JSA as Jobs and Skills Council for Education and Training Sectors

WAVE and ERA also **recommend (IV)** that JSA be the Jobs and Skills Council for the Australian Education and Training sectors. In this role, JSA can then undertake the work to identify the skills and workforce needs for the education and training sectors including the mapping of career pathways, developing the training products and enabling improvements to the way that our national skills and education workforce is developed, assessed and continuously improved.

For too long our education and training workforce has been treated as an "aside" to our national skills system – an add on rather than what it really is - central and key to the delivery of the

outcomes and reform goals of the Australian Government for our national skills and education system. By JSA incorporating this into its design and structure as an independent statutory agency, it would create a symbiosis between the strategy of change for our skills system and the workforce on whose shoulders our hopes for this strategy depend.

FUNCTIONS

Q2: What principles could be used to guide Jobs and Skills Australia's priorities, and the development of its workplan?

WAVE and ERA prosecute the value of these general principles to guide JSA to ensure its work is inclusive and addresses the needs of women. We **recommend (V)** that these are:

Gender equity: The agency should strive to address gender-based barriers to accessing training and education and promote gender equality in the labour market.

Inclusiveness (so no one is left behind): The agency should take a holistic approach to skills development and training, considering the different life stages, responsibilities, and circumstances of women.

Work-life balance: The agency should consider the need for flexible and part-time training options that enable women to balance work and family/volunteer responsibilities.

Life-long learning and career progression: The agency should support the notion that people learn throughout their lives and as their circumstances change. Women's career transitions and progression should be supported by providing training and education programs that enable them to transition jobs, advance in their careers and access new and emerging industries. In this we note and refer to the principles of lifelong learning (as defined by Jobs Queensland's Research, [Lifelong Learning – The Foundation of future work - which placed the individual at the centre](#)) which acknowledges the learning journey from secondary school to tertiary education provides more capacity for change than the current definition and system of "skills and training". There also needs to be acknowledgement of and capacity within the system to recognise and value learning that takes place outside of formal institutions and systems and contributes equally to social and economic value.

To that end, the functions of JSA need to reflect a definition of skills and workforce that encompasses all learning pathways - secondary to higher education – and the diversity of those pathways and journeys that Australians will take over the course of their lifetime.

Cultural sensitivity: The agency should be sensitive to cultural and religious beliefs that may impact women's participation in the workforce and ensure that its programs are inclusive and accessible to women from diverse backgrounds.

Data-driven approach: The agency should use data and research to understand the specific needs and challenges faced by women in the labour market, and design programs that respond to those needs.

Other more general principles that we assume will guide JSA's work include:

Relevance: The agency should focus on providing training and education that aligns with the skills needed for the jobs of the future.

Accessibility: The agency should work to ensure that all members of the population, regardless of their background or circumstances, have access to the training and education they need to succeed in the workforce.

Collaboration: The agency should work closely with employers, educational institutions, and other relevant organizations to ensure that training and education programs are responsive to the needs of the labour market.

Innovation: The agency should embrace innovative approaches to skills development and training, such as online learning and experiential learning, to keep pace with changing technological and economic realities.

Flexibility: The agency should be flexible in its approach and responsive to changes in the labour market, so that it can adapt and provide the training and education that people need to succeed in the jobs of the future.

Quality: The agency should strive to provide high-quality training and education programs that are effective in preparing people for the workforce and that are recognised by employers and other stakeholders.

Taking into account our previous recommendations (including the role and outputs of the suggested Equity and Equality Committee), WAVE and ERA **recommend** that – as a set of criteria – JSA’s workplan be:

- **evidence based** and deliberately **add to the evidence base** through evaluation of its programs, policies and impact.
- built upon **identifying the drivers of intersectional gender inequity in our education and training system and addressing those drivers.**
- ensure that **equity strategies** to address ongoing barriers to participation in our workforce and education and training system are developed across our education and training system. Equally as important is ensuring that targeted and evidence-based strategies that improve women’s access and equitable participation in our labour market are adequately resourced and prioritised. The development of these strategies needs to be done in consultation with the people most impacted by their outcomes.
- ensure that **JSA’s engagement with stakeholders is transparent and equitable.** The credibility and efficacy of the work that JSA undertakes will be strengthened if it is transparent about the inputs it receives *as well as equitable about its own processes.* Our education and training system needs to ensure it delivers to all Australians which will benefit of all our economy and society. JSA’s own processes should not “privilege” the advice of some education and training system users, above others along the full range or private, public, industry and community education settings to contribute to learning journeys.
- ensure that the outcomes of JSA’s work contribute to **addressing the entrenched gender pay gap, and gender segregated labour market** (which is a key contributor to the pay gap).

Stakeholder Engagement

WAVE and ERA **recommend (VI)** that the process used to develop priorities and workplans be based on a set of conditions to ensure diverse input that centres the lived experience of the national education and training system’s users, students and workforce, first and foremost. This would

ensure that the process is inclusive and considerate of the impact of rurality/geographic isolation, Aboriginal and Torres Strait Islander communities, migrant and refugee communities, the specific gendered barriers faced by women, as well as business and industry needs.

This can be achieved by JSA undertaking a **(VI) gender impact assessment on its planning and engagement processes**. For the purposes of this submission, we define a gender impact assessment as a prospective evaluation, analysis or assessment of law, regulation, policy or program that makes it possible to identify in a preventative way, the likelihood of a given decision having negative consequences for the state of equality between women and men and those facing intersectional disadvantage. (Adapted from the European Institute for Gender Equality (EIGE) *What is Gender Impact Assessment* <https://eige.europa.eu/gender-mainstreaming/toolkits/gender-impact-assessment/what-gender-impact-assessment>) This process is used globally and has a strong evidence based for providing policy owners with better outcomes for public programs, policies and services. Crucially this needs to be undertaken by those that have expertise in intersectionality and gender mainstreaming highlighting the opportunity for JSA to do this through the Deputy Commissioner role.

The take up of this recommendation will be a significant signal to the education and training system of the importance afforded to intersectional gender equity by the agency.

Q3: How could Jobs and Skills Australia seek broader input into the development and refinement of its workplan?

WAVE and ERA reiterate our **recommendation (VII)** that JSA undertake gender impact assessments across its policies and processes that underpin its stakeholder engagement and planning

It is important that consultation includes direct connection with key stakeholders in the broader community (employees, the labour market) as well as associations and non-government organisations (NGOs) who can be the voice of cohorts, so that their stories and insights are heard. This would enhance the information and analysis gained from the bodies included for consultation in the Tripartite advisory body.

Consultations need to be guided by common criteria to provide contextualisation and enable the understanding of sector specific causal factors that enable or inhibit jobs and skills development. Consultation also needs to provide for the testing and validation of the impact of work plans and processes on the target cohorts and allow for strategies and solutions to be generated by those most impacted by barriers and inequity in the system,

These considerations should include systemic factors as well as industry or organisational factors such as culture and leadership. JSA needs to hear the voice and lived experience of:

- Rural and regional Australia and the impact that geographical barriers have on equitable participation in our education and training system.
- Aboriginal and Torres Strait Islanders, and, further, JSA should seek to ensure that its workplan is in line with the principles of reconciliation and the Uluru Statement from the Heart;
- Migrant and refugee women including the voices of migrant and refugee women who come to Australia with their partners who may be employed under Australia's skilled migration

scheme (WAVE has argued that this source of skills – Skilled Migration – is inherently inequitable for women, and further entrenches discrimination against women).

- Women in all their diversity who do not have the same pathway through training and employment as men due to caring and cultural responsibilities.
- Women with disabilities
- Older Australians, in particular older women.

WAVE and ERA **recommend (VIII)** that JSA adopt an engagement approach that seeks to connect directly with community through outreach, to learn and collect data on the lived experience of all end users of our education and training system with a particular focus on those voices that have not been heard in the past (as demonstrated through inequitable access). To achieve this it is **recommended (VII)** that JSA undertake road shows, capability building and listening webinars, community conversations with partners, and other activities that would more strongly connect the agency with the systems and structures that it needs to engage with in order to achieve truly equitable skills and training solutions for all Australians – this cannot be just with industry peaks and major employers, and unions any more. . JSA should be an outward facing and community engaging agency – one that is driven by partnership, builds upon and contributes to the evidence base, is strengths based, and values driven.

Q4: How could Jobs and Skills Australia engage tripartite partners, experts, and other interested parties in its major studies?

Tripartism and its design is an outcome of the assumptions, beliefs and norms that organisations set themselves upon – often unsaid. Our contention is that for too long, these assumptions and norms have resulted in a system of advice (including tripartism) that has limited the inputs, views and experience that our education and training system can learn from, and from that, the “levers” and range of strategies that education and training has to call upon to deliver for the Australian economy and society.

For this reason, WAVE and ERA strongly **recommended (IX)** that JSA’s tripartite environment must include education and community experts. A key contributor to inequity is the legacy of decision making over many years, that did not centre lived experience and the voices of those that suffer from discrimination from our education and training sector.

JSA must be an outward facing and community engaging agency – one that is driven by partnership, builds upon and contributes to the evidence base, is strengths based, and values driven. It must be reflective about its own power in our education and training system, and use that power to address inequity as part of its work to increase productivity and build the economy.

JSA needs to reframe what it means by tripartism and acknowledge that in doing this work they have the opportunity to include the voices of those that reflect the diversity of the population – not just the privileged.

A key part of the reframe is to consciously understand and articulate the inextricable link between a well society and a healthy economy. That one cannot succeed without the other – something which if anything, COVID pandemic has taught us well.

By reframing the way skills and education is viewed, from one that is confined to “economic metrics of success” to one that understands the role of education and training as a builder of communities, wellbeing and social inclusion, JSA has the opportunity to reframe and strengthen who it involves in major studies and further, what studies it will commission.

Reframing what is meant by Tripartism (in light of a clear mission) will also enable JSA to draw upon existing networks, and evidence and the work already completed and in plan, by engaging in dialogue with economic and social structures/organisations, and the full range of education settings (private, public, industry and community) rather than “reinventing the wheel”. In this way JSA can also act in a way that is partnership and strengths based and build stronger relationships across the education and training system.

A key component of any major work commissioned by JSA will be of the voices of key stakeholders are reflected and articulated in recommendations, solutions and outcomes. Successful policy outcomes and strategies require ownership by all parties who will be impacted by the issues being addressed.

Q5: What new information should Jobs and Skills Australia be collecting through its engagement to build a stronger evidence base?

Use of Disaggregated Gender Data and evaluate practice.

The availability and use of gender disaggregated data across education, training and workplaces is essential if JSA is to identify and evaluate intersectional issues experienced by diverse women from all social groups; the impacts of these issues on them; the factors enabling and perpetuating systemic gender-based discrimination and the gaps in efforts made to address this. This evidence must underpin all work undertaken by JSA.

Education and training frameworks and strategies (including delivery and curriculum) need to be evaluated to gauge where and to what extent gender bias is entrenched, and the role education and training can take in addressing this. JSA should evaluate the investment that has occurred already across the jurisdictions to improve women's participation in male dominated trades. The data collected should include data employment funding policies across all industries and sectors, it is anticipated such data would demonstrate a preference for funding for sectors where gender imbalance is entrenched (for instance, major infrastructure and apprenticeship policies).

JSA has a legislated requirement to publish all evidence, research and data in a range of areas. This function should be extended to the publication of gender-specific information, research and data. Such information has the potential to inform policy not just at federal level but also across all jurisdictions. JSA should resource the distribution of the research and evidence *including* building the capacity of the Australian education and training system to understand the role of the evidence/research, how it can be used and, ownership across all key stakeholders of said data/evidence.

Equity in our Education and Skills System

Previously, WAVE and ERA recommended that JSA take on the role of "Jobs and Skills Council" for the education and training sectors. A key reason behind this is because this industry is itself inequitable. As reported on by WGEA and in Victoria, through the Commission of Gender Equity in the Public Sector, the national education and training workforce has a persistent pay gap, is segregated by gender (vertically and horizontally) and suffers with rates of sexual harassment at, or higher than the national level.

WAVE and ERA **recommend (X)** that JSA undertake a program of work that addresses inequity in the education and training system (as reported through WGEA and the Victorian Government's Commission for Gender Equality in the Public Sector). This can be undertaken through the development and delivery of a gender equality action plan/s and providing appropriate resourcing to ensure that the goals of those plans, are realised.

The core issue here is that the education and training sector *as a whole* must itself be equitable if it is going to champion equity across the system. The education and training workforce needs to reflect the vision of the workforces that it is seeking to skill and educate. It needs to understand that it is a model of what potential workforces can be, and it can, through the delivery of education and training, through the setting of equitable policy and practice, and through appropriate planning for its future, demonstrate and help lead change.

International Practice

JSA has further opportunities to engage with the work of other countries that may be going through the same identified jobs and skills crisis. Establishing international partnerships that may nurture and grow our Australian education and skills policy and practice can be a strong way of the building capacity of our system through learning from others.

WAVE and ERA **recommend (XI)** that JSA should develop programs of work with international partners to internationally benchmark its work and the progress of Australia's education and training system's key indicators (including equity, translation of education to workforce participation, addressing inter-generational unemployment, etc).

FUNCTIONS AND WAYS OF WORKING

Q6: How can Jobs and Skills Australia expand its engagement with a broader range of skills and industry stakeholders in its work?

As an immediate priority, WAVE and ERA **recommend (VII)** that JSA undertake a gender impact assessment on its consultative and engagement policy and protocols. This assessment would inform JSA on what engagement practices and processes to work to that would maximise its engagement with a broader set of stakeholders and is a globally recognised approach to engaging stakeholders to inform equality.

A gender impact assessment approach centres a key problem to which a solution is sought. Reframing the question being posed here the key problem facing JSA is that “Australia’s education and training policy does not have a broad enough group of stakeholders for input into policy”. If this is the key problem, JSA needs to ask itself why this is the case, and what assumptions are currently held within existing approaches to engagement - assumptions such as the methods of engagement are appropriate [they are not]; or, quality input on skills needs cannot be achieved outside of the current structures [this is not true].

In depth examination of systemic assumptions using a gender impact assessment methodology, will enable JSA to use data/evidence (both qualitative and quantitative) that identifies what other possible options exist and, evaluate those options against criteria that seeks to deliver a solution that maximises equity and equality.

WAVE and ERA would argue that current methods are not appropriate – for instance, the predominant use by governments to require submissions through online portals, or current training package engagement/consultation strategies that limit voice and insights. We would also further argue that consultation that is piecemeal and does not situate questions for consultation within a wider context, and devalues and limits a broader level of input and voices, will continue to not influence future jobs and skills needs.

The Australian community have a right to contribute to and comprehend the education and training system that they will use, and whilst the language that “everyday Australians” use may not align to the highly technical VET nomenclature, (especially those who are disadvantaged and discriminated against by our current system) the messages used need to be clear, and aligned to a common mission. Skilful and successful engagement that delivers deep useful evidence to evolve systems and structures understands the strengths and richness in diverse views. It embraces these and resources pathways to capture it. WAVE and ERA have made recommendations in this submission about how JSA can be structured to build an agency that respects and actions this.

Q7: What types of outreach could Jobs and Skills Australia use to increase visibility and use of its products and advice?

Public servants will be familiar with the standard way governments and their agencies do outreach - from public surveys to focus groups and community and stakeholder engagement and meetings. A key outreach method is **social media**; utilising platforms to reach wide and niche audiences and generate feedback.

We urge JSA to go where people already are; to understand what platforms and information channels women use and places and locations in communities where people live, work and socialise.

Grassroots publications like community newsletters are as important as government website links on Facebook.

Outreach must be multidimensional, combining active forms with traditional passive forms. JSA should translate its products and services for different audiences, different agencies and organisations and in different languages and contexts.

By way of example, in the area of health and wellbeing produced by tertiary/university research institutions is translated into public health policy, practice and health messages (including through health promotion). WAVE and ERA see a role for JSA to do similar work when it comes to Australia's education and training system, and in a way that moves beyond current siloed approaches to traditional products and tools (and cohorts). For instance, if we look at a product and service on career advice there is the opportunity for JSA to facilitate engagement with parents and communities around careers based on the evidence of multiple careers through a person's life.

There is also the opportunity to work in partnership with diverse communities (for instance migrant communities) and aligned agencies to translate and broker career advice into those communities in a way that increases workforce participation

To add to this work, JSA would capture evidence and evaluation from such programs over time to demonstrate impact and add to the evidence base.

What we can learn from health is the opportunity to apply evidence across intersectional and social determinants to ensure that the evidence and data is applied in a way that is relevant and real for communities.

Communicate what JSA is and does.

WAVE and ERA also **recommend (XII)** that JSA needs to consistently and congruently communicate how it differs from existing structures – and never assume that this is well understood. Opportunity to do this will grow when JSA further learns from and establishes its functions and ways of work – but clear communication, understanding the range of end users that it services and work will impact, will be vital to the success of the organisation. Understanding and presenting its outputs in formats and languages of the intended audience will be key to getting engagement and traction.

Q8: How could Jobs and Skills Australia present its data and advice to aid stakeholders in informing their needs? What formats could better inform your work?

As already identified, WAVE and ERA **recommend (XIII)** that JSA deliberately undertake work to build the capacity and capability of the education and training system to use and translate JSA's products and services into their practice. A clear opportunity that was missed by the National Skills Commission was to undertake outreach work to deliberately train a range of stakeholders on how to use Jobs and Education Data Infrastructure (JEDI) – not only to education and training providers and/or career advisers, but to employers, to parents, to employment services. In essence – the end users that would benefit from this incredibly valuable resource.

Likewise, we reiterate our previous recommendation that all products, services and policies developed by JSA commence with a gender impact assessment to ensure that the outcomes of that product/policy/service development keep equity and equality at the heart of its design.

Key opportunities also lie in JSA developing an understanding of the value and role that equality and equity has in addressing current challenges facing our national skills and education system – such as skills shortages. This includes building understanding and capacity for the stakeholders across the education and training system to appreciate the value of gender disaggregated data as a way of better informing and learning how applying a gender lens, provides greater and deeper opportunity to address challenges in our labour force.

-END-

WAVE GLOSSARY OF TERMS

<i>When we say...</i>	<i>What we mean is...</i>	<i>What we don't mean is...</i>
<i>Vocational and Adult Education</i>	<p>The products, services and policies that underpin vocational skilling of people in Australia through education and/or training. This is inclusive of vocational education that occurs in secondary schools, the vocational education that is delivered in universities, adult education that occurs in community settings and also foundation skills, literacy and numeracy education for adults.</p> <p>What draws this together is the enabling effect that these pathways of learning have on jobs and employment of women</p>	<p>We do not include in our definition university degrees or vocational pathways delivered by training providers in locations outside of Australia.</p>
<i>The national vocational education & training system</i>	<p>1) "The national training system is the Australian system for Vocational Education and Training (VET). It provides people with work-ready skills and qualifications..." https://www.australianindustrystandards.org.au/national-vet-system/</p> <p>2) "The extent to which state and territories and the Commonwealth of Australia governments come together to agree on policies and programs to deliver and fund vocational and adult education. It is inclusive of state/territory and commonwealth funding programs, regulatory frameworks and policies and nationally agreed policy structures such as training packages, industry advisory mechanisms, and agreements". https://www.pc.gov.au/ongoing/report-on-government-services/2022/child-care-education-and-training/vocational-education-and-training</p>	
<i>Technical Vocational Education & Training (TVET, VET)</i>	<p>Technical and vocational education and training (TVET) is understood as comprising education, training and skills development relating to a wide range of occupational fields, production, services and livelihoods. TVET, as part of lifelong learning, can take place at secondary, post-secondary and tertiary levels and includes work-based learning and continuing training and professional development, which may lead to qualifications. TVET also includes a wide range of skills development opportunities attuned to national and local contexts. Learning to learn, the development of literacy and numeracy skills,</p>	

	transversal skills and citizenship skills are integral components of TVET (UNESCO: 2016, 2022) ⁴ .	
Gender Equity and Gender Equality	<p>WAVE uses these two terms - deliberately and not interchangeably</p> <p>Drawing from the United Nations Entity for Gender Equality and the Empowerment of Women (UN Women) we recognise that:</p> <p>Equality between women, men and gender diverse peoples (gender equality): refers to the equal rights, responsibilities and opportunities of all genders. Equality does not mean that women and men will become the same but that human rights, responsibilities and opportunities will not depend on whether they are born male or female. Gender equality implies that the interests, needs and priorities of both women and men and gender diverse people, are taken into consideration, recognizing the diversity of different groups of women and men and gender diverse people. Gender equality is not a women’s issue but should concern and fully engage men, gender diverse people, as well as women. Equality between people of all genders is seen both as a human rights issue and as a precondition for, and indicator of, sustainable people-centred development.</p> <p>While the term gender equity was determined by the CEDAW committee in its General Recommendation 28 that all parties will use the term “equality”, in Australia the term “equity” has gained some traction with gender mainstreaming professionals for its recognition that people have different needs and power and that these differences should be identified and addressed in a manner that rectifies the imbalances between genders WAVE uses this term in the full recognition that in the past it has been used to perpetuate stereotypes.</p>	
Gender	<p>Drawing upon the definition of UN Women, WAVE defines gender as:</p> <p>The social attributes and opportunities associated with being male and female and the relationships between women and men and girls and boys, as well as the relations between women and those between men. These attributes, opportunities and relationships are socially constructed and are learned through socialization processes. They are context/ time-specific and changeable. Gender determines what is expected, allowed and valued in a woman or a man in a given context. In most societies there are differences and</p>	

	<p>inequalities between women and men in responsibilities assigned, activities undertaken, access to and control over resources, as well as decision-making opportunities. Gender is part of the broader socio-cultural context. Other important criteria for socio-cultural analysis include class, race, poverty level, ethnic group and age.</p>	
Empowerment of women	<p>The empowerment of women concerns women gaining power and control over their own lives. It involves awareness-raising, building self-confidence, expansion of choices, increased access to and control over resources and actions to transform the structures and institutions which reinforce and perpetuate gender discrimination and inequality. The process of empowerment is as important as the goal. Empowerment comes from within; women empower themselves. Inputs to promote the empowerment of women should facilitate women’s articulation of their needs and priorities and a more active role in promoting these interests and needs. Empowerment of women cannot be achieved in a vacuum; men must be brought along in the process of change. Empowerment should not be seen as a zero-sum game where gains for women automatically imply losses for men. Increasing women’s power in empowerment strategies does not refer to power over, or controlling forms of power, but rather to alternative forms of power: power to; power with and power from within which focus on utilizing individual and collective strengths to work towards common goals without coercion or domination. Drawn from the European Institute for Gender Equality.</p>	
Intersectionality	<p>Intersectionality is a way of seeing or analysing the dynamics of power and social inequality in our society. It can be described in different ways: as a theory, an approach, a lens, a framework and so on. What is essential to the idea of intersectionality is the recognition that inequalities are never the result of any single or distinct factor such as race, class or gender. Rather, ‘they are the outcome of different social locations, power relations and experiences’ (Hankivsky, 2014 in Multicultural Centre for Women’s Health <i>Intersectionality Matters: A guide to engaging immigrant and refugee communities in Australia</i>. 2017</p>	
Gender transformative	<p>When we are gender transformative, we are addressing the “causes of gender-based inequalities and work to transform harmful gender roles, norms and relations. They challenge both normative and structural inequality.”</p> <p>Drawn from Our Watch <i>A guide to help you work out how gender transformative your initiative is</i></p>	

	https://handbook.ourwatch.org.au/leadership-resource/a-guide-to-help-you-work-out-how-gender-transformative-your-initiative-is	
Gender Specific	<p>"...Approaches acknowledge gender inequalities and consider women's specific needs, but do not transform norms and practices. "</p> <p>Drawn from Our Watch <i>A guide to help you work out how gender transformative your initiative is</i> https://handbook.ourwatch.org.au/leadership-resource/a-guide-to-help-you-work-out-how-gender-transformative-your-initiative-is</p>	
Gender sensitive	<p>These approaches acknowledge but do not address gender inequalities.</p> <p>They are not harmful, but they don't make sustainable changes to society that lead to long-term and significant reductions gender inequality</p> <p>Drawn from Our Watch <i>A guide to help you work out how gender transformative your initiative is</i> https://handbook.ourwatch.org.au/leadership-resource/a-guide-to-help-you-work-out-how-gender-transformative-your-initiative-is</p>	
Gender insensitive	<p>These approaches ignore gender norms and inequalities, can minimise efforts to address gender inequality, and risk contributing to the gendered drivers of violence through implicit support of existing norms.</p> <p>Drawn from Our Watch <i>A guide to help you work out how gender transformative your initiative is</i> https://handbook.ourwatch.org.au/leadership-resource/a-guide-to-help-you-work-out-how-gender-transformative-your-initiative-is</p>	
Traineeship	<p>A traineeship is a formal training arrangement between an employer and a person who undertakes structured on-the-job training in health, care, support work, infrastructure, engineering, business, IT, digital marketing, hospitality and events for a period of 12 months to two years full or part time. The trainee is paid while they train, with set base rates, including full allowances and entitlements. The qualification can vary from a Certificate II to an Advanced Diploma.</p>	
Apprenticeship	<p>An apprenticeship is a formal training arrangement between an employer and a person who undertakes structured, on-the-job training focused on trades in automotive, electrical, mechanical, bricklaying, plumbing, and carpentry for a period of three to four years, full or part time. The apprentice is paid while they train, with set</p>	

	base rates, including full allowances and entitlements. The qualification can vary from a Certificate II to an Advanced Diploma.	
--	--	--