

24 July 2023



Women in Adult and Vocational Education (WAVE)

RESPONSE TO JOBS AND SKILLS AUSTRALIA CONSULTATION PAPER ON THE ANNUAL WORKPLAN PROCESS



Women in Adult and Vocational Education (WAVE)

Response to Consultation Paper on JSA Annual Workplan Development Process

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.

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EXECUTIVE SUMMARY AND RECOMMENDATIONS

WAVE envisages an annual workplan development process that has equity at its centre. As it stands, equity and any of the mechanisms required to ensure its implementation, monitoring and evaluation are nowhere to be found. We note that this is counter to the National Skills Agreement¹ due to commence in January 2024 which makes explicit statements about equity including women's participation².

Given the rapid change that is taking place across all sectors of our education and training system – Australia and globally - it is imperative that there is consistent agreement on the ways that gender equality and equity will be implemented and embedded to address inequity across the whole skills ecosystem. To cater effectively for Australia's diverse population it must include attention to gender equality and intersectionality.

Furthermore, the relationship between Jobs and Skills Australia (JSA), and Jobs and Skills Councils (JSCs) responsibility for and coordination of equity and equality across all areas of responsibility is not clear. Our concern is that while there is public discussion on equity, the responsibility, and accountability for this work is not understood or described. Further, WAVE is concerned about the capability of these new structures (and lack of gender equity expertise) to design and administer this specialist work. Unless each decision-making committee (high level or otherwise), includes expertise in intersectionality and gender equality, the persistent and ongoing inequity in our education and training systems will be reproduced, and ongoing.

Our submission recommends that JSA's annual workplan development process include an additional element of intersectional gender equity in the workplan concepts to ensure equity is embedded as an organising principle. With this addition the workplan processes will:

- I. Ensure that the programs and products embody the point of connection to JSA's strategic advice and deliverables including informing the criteria for selection of in-depth projects, research, labour market analyses, capacity studies and workforce profiles. In essence the selection of criteria would be overlaid with an intersectional gender lens.
- II. Create processes for policy design that encourage and continuously improve engagement for so that diverse voices are heard, and inclusive practices are the bedrock of JSA's work with partners, industry and the skills system
- III. Provide space for JSA to deliver communication and engagement activities that seek to build the capacity and capability of the national skills system in a way that enables JSA's advice, evidence, activities and workplan to have strong connections with those it serves.

¹ 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>

² Ibid: Clause 3 – “ensures 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”; Clause 4 – “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”; Clause 6 – “pursues greater national consistency where beneficial to ensure access, equity, and transparency, ...”.

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Consultation, Engagement and Policy Design

We also recommend that JSA's communication, policy design and engagement processes and structures be inclusive of diverse voices that use our national education and training system. As much as possible, these processes and structures should take what ever steps are necessary to be inclusive, and, further, recognise that current structures privilege the voices of those that have the time, resources and authority to contribute to the design and planning work of JSA.

By centering equity as a core element to the workplan of JSA, the agency can put an intersectional equity lens on its engagement, its consultation and policy processes to reduce the risk that inequity is built into the design processes.

Work plan development process and structures

Based on our recommendations regarding the inclusion of an additional element in the workplan concepts, along with the need for clear specifications on how it applies to programs, policies, and products, together with requirements for equity in consultation, engagement, and policy design, we recommend that JSA's workplan development process prioritises equity.

WAVE re-states the importance of previous advice provided to JSA and the Australian Government regarding the design of governance and structures to support the enhanced workplan development process. This includes the establishment of a national advisory committee on equity and equality, as well as a dedicated unit or work area (potentially under a Deputy Commissioner role) to support the committee's efforts. These measures are essential to ensure the successful implementation of the new workplan element and the necessary capacity to fulfill its objectives.

PREVIOUS RELEVANT SUBMISSIONS AND ADVOCACY

Previous to this submission, WAVE has advocated on a range of matters that we know from evidence and our experience are both indicators and drivers of inequity. We have asked JSA and Government to:

- **Ensure that equity is a central focus** of all Australian VET policy work and resource our VET and Adult Education and training systems accordingly.
- **Challenge gender stereotypes across our systems and structures.** Our education and training system often perpetuates and reinforces gender stereotypes through qualification design and delivery. This includes competency-based skills frameworks that if left to be delivered in the absence of any other systemic change plan, will be a key enabler of ongoing inequity.
- **Address funding inequities.** Feminised skill pathways, such as those in health and education, are often funded less than male-dominated pathways, such as those in engineering and construction.
- **Account for the higher costs of participation for women.** Women often face higher costs of participation in VET and adult education than men. For example, they may have to pay for childcare or transportation, which can make it difficult for them to afford to attend classes. VET and adult education must be more affordable for women by providing financial assistance and other supports, recognising their social and familial commitments.
- **Put the lived experience of all learners** particularly women, at the centre of decision-making in VET and adult education.
- **Ensure gender-segregated data is used for all reporting.** Gender-segregated data is the baseline.

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- **Measure the success of our VET and Adult Education system** by its positive impact on our economy and society. Use gender-segregated data to plan, monitor, and evaluate all Australians' participation in skills and employment programs.

WAVE and other interested organisations have previously shared evidence and information about gender barriers to participation in recent investigations and submissions to the Federal Government including:

- Australian Government's Consultation on the [Employment White Paper](#)
- Response to the Australian Government's Discussion Paper on [Future Delivery of Foundation Skills in Remote Australia](#)
- Response to [Australian Apprenticeship and Supports Discussion Paper](#)
- Submission to Federal Government on new [skills and employment agency Jobs and Skills Australia](#) with Equality Alliance Australia
- Response to Australia's development of [a new migration strategy](#)
- Submission to the [House Inquiry into the Perceptions and Status of VET](#)
- WAVE and Xellence Pathways Submission to [JSA Clean Energy Workforce Discussion Paper](#)
- Submission to Australian Government's [draft strategy for the care and support economy](#)

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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 also provides input into T/VET and adult education regionally and 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 centering 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.

INTRODUCTION & CONTEXT FOR OUR SUBMISSION

WAVE thanks Jobs and Skills Australia for the opportunity to contribute this response into the consultation on JSA's work planning processes and, as such, provide input into the way that JSA can strengthen its systems and structures to better ensure the organisations can meet its functions and role.

For WAVE, the development of a robust work plan approach is crucial for JSA to provide and deliver independent high-quality advice to Government/s to underpin Australia's response to current, emerging and future workforce, especially relating to skills and training needs.

WAVE UNDERSTANDING OF JSA FUNCTIONS

For WAVE, JSA's workplan process must deliver to the functions of the organisation which according to *Jobs and Skills Australia Act 2022* and the *Jobs and Skills Australia Amendment Bill 2023* (added in red below) which collectively are:

- (a) to provide advice to the Minister or the Secretary in relation to the following:
 - i. Australia's current and emerging labour market, including advice on workforce needs and priorities;
 - ii. Australia's current, emerging and future skills and training needs and priorities (including in relation to apprenticeships);
 - iii. the adequacy of the Australian system for providing VET, including training outcomes;
 - iv. issues relating to skills and training, and workforce needs, in regional, rural and remote Australia;
 - v. pathways into VET and pathways between VET and higher education;
 - vi. opportunities to improve employment, VET and higher education outcomes for cohorts of individuals that have historically experienced labour market disadvantage and exclusion;
 - vii. opportunities to remove barriers to achieving gender equality in the provision of training and in the labour market, and opportunities to improve gender equality outcomes;
- (b) to prepare capacity studies, including for emerging and growing industries and occupations;
- (c) to undertake workforce forecasting, assess workforce skills requirements and undertake cross-industry workforce analysis;
 - i. to identify labour market imbalances and analyse the demand and supply of skills;
 - ii. to analyse skills needs and workforce needs, including in regional, rural and remote Australia, and in relation to migration;
 - iii. to undertake studies, including on opportunities to improve employment, VET and higher education outcomes for cohorts of individuals that have historically experienced labour market disadvantage and exclusion;
 - iv. to contribute to industry consultation forums;
- (d) to undertake research and analysis on the resourcing and funding requirements for registered training organisations (within the meaning of the National Vocational Education and Training Regulator Act 2011) to deliver accessible quality VET courses;
- (e) to inform the public about the matters mentioned in paragraphs (a) to (d);

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- (f) to collect, analyse, share and publish data and other information about the matters mentioned in paragraphs (a) to (d) to inform policy development and program delivery; and
- (g) any other function that:
 - i. is conferred on Jobs and Skills Australia by the rules, by this Act or by any other law of the Commonwealth; or
 - ii. is incidental or conducive to the performance of the above functions.

Our advice to JSA through this response, is that the draft workplan concepts and structure is not conducive to delivering the outcomes required by the legislation. Specifically what is presented will not enable JSA – or its work with the JSCs and other committees (e.g. the Qualification Reform Design Group) – to identify the imbalances in the labour market, to identify opportunities to improve employment for individuals that have and will experience labour market disadvantage, undertake studies that improve employment, or contribute in a way through consultation forums, or through the data that is analysed and published to address inequity.

On this last point, WAVE note that there is a significant range of research over decades on the barriers and systemic inequity across our education and skills system (both industries and occupations). JSA's work plan must to be forward looking rather than just focusing on barriers. JSA needs to be putting itself in a position – through a strong workplan process – to facilitate transformation of existing workforces into new workforces that are required in the immediate and ongoing future. This will be the way that rapid change across the world is accommodated and supported in Australia.

Our initial advice to Government on establishment of JSA

When WAVE and the Equity Rights Alliance (ERA) provided our submission to the Australian Government on the legislation and establishment of Jobs and Skills Australia (JSA), we advised legislators and designers of the agency to:

- 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 based on a set of conditions to ensure diverse input, and 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 which engagement practices and processes to work to in order to 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

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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 equitable skills and training solutions for all Australians.

- IX. Enact an expanded inclusive structure that includes education and community experts and representatives of selected relevant Civil Society Organisations (CSOs) in line with international best practice.
- 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.

In summary, the recommendations advocated that JSA:

- Prioritise equity in its planning, advice, activities, and measurement.
- Centre the diverse lived experience of all users of Australia's VET and Adult Education system, especially those facing intersectional and gendered barriers.
- Employ engagement and planning approaches that utilise evidence-based tools and strategies to prevent inequity and actively promote equality and equity throughout the VET system.

It is these same principles and underpinning structures that WAVE will use as the basis of the feedback to the JSA Consultation Paper on its Annual Work Plan. For JSA to undertake its "functions focused on improving skills development, employment opportunities and economic growth" (JSA Consultation Paper 2023, p. 5).

ANNUAL WORK PLAN ELEMENTS

In keeping with our previous advice on the intent and goals of JSA, WAVE advises JSA that the construct of the work plan concept is missing one vital element – that is an element that centers equity, intersectionality and gender equality.

WAVE previously advised JSA and the Australian Government that addressing equity, including gender equity, is a crucial aspect that needs attention in education and training policy. Moreover, this is affirmed by direct inclusion in National Agreements and international obligations. Over the past four decades, it has been widely acknowledged that equity remains one of the key issues yet to be resolved in VET³. International evidence, policy, and practice highlight the significance of addressing equity to ensure that national education and training systems effectively fulfill their goals of promoting workforce participation, enhancing economic productivity, and fostering social inclusion. (As quoted in WAVE/ERA Response to Jobs and Skills Discussion Paper, 10th Feb 2023⁴)

Enabling an equitable system and to undertake the work to identify and address intersectional barriers to those outcomes that JSA was set up to achieve must to be central to JSA's work plan.

JSA needs to prioritise equity in its work and take proactive measures to identify and address intersectional barriers that, unless addressed, will hinder the ability for JSA to achieve its goals.

To illustrate WAVE proposes a new framework for JSA's workplan elements with a new section on equity as highlighted (in WHITE)

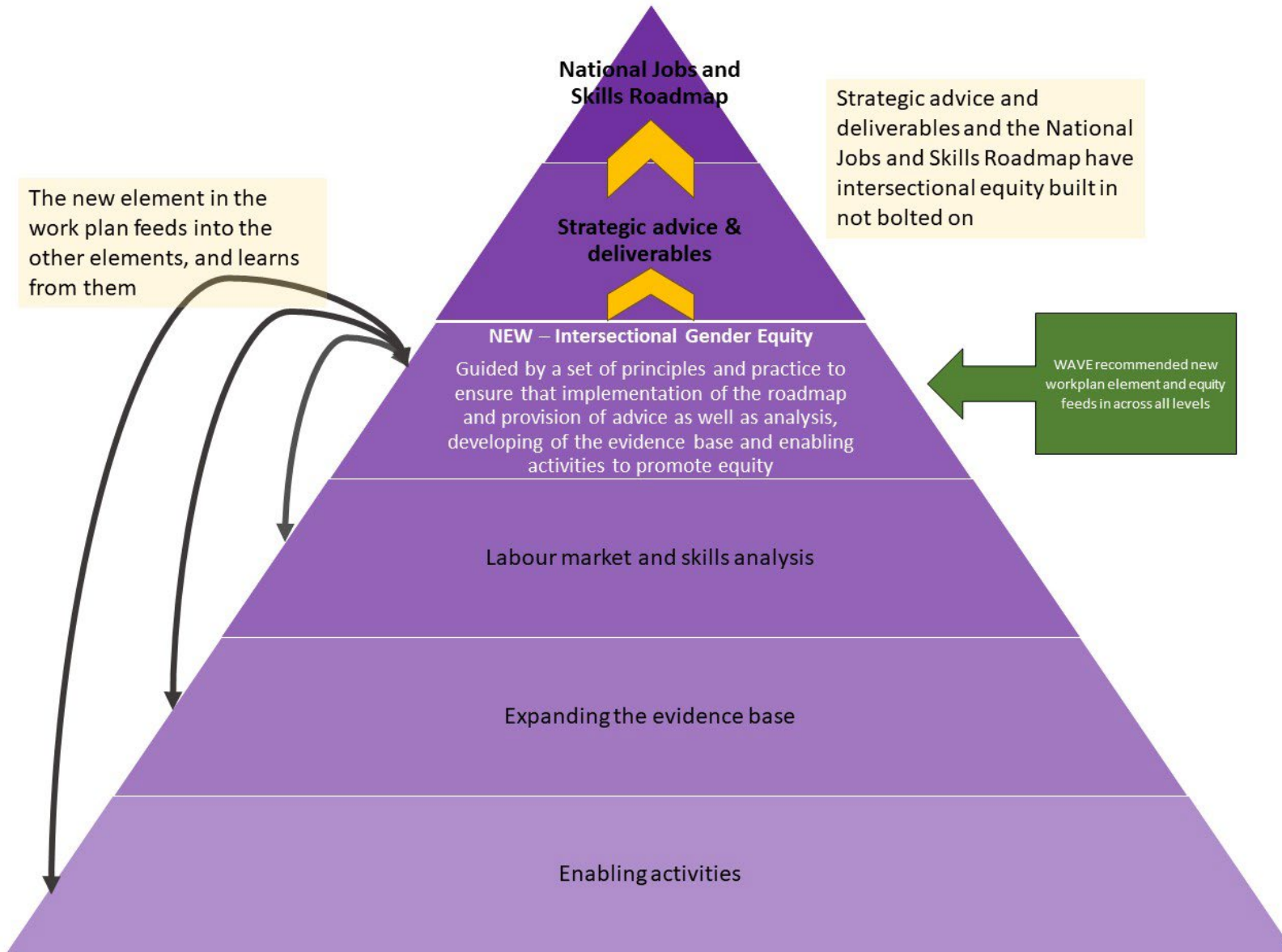
³ Butler, Elaine & Ferrier, Fran (2023), *A fair go for all? Equity frameworks and landmark documents in Australian vocational education and training*, VET Knowledge Bank, NCVET, Adelaide, <https://www.voced.edu.au/vet-knowledge-bank-landmark-documents-equity-access-historical-overview>

⁴ <https://wave.org.au/new-agency-jobs-and-skills-australia-urged-to-centre-lived-experience-and-equity-and-to-engage-broadly/>

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FIGURE 1 WAVE REVISION OF JSA WORKPLAN ELEMENTS



Principles to underpin the new workplan element:

Intersectional gender equity

WAVE strongly recommends that the new workplan element, *intersectional gender equity*, should have a solid foundation of principles and practices. In February 2023 the WAVE and ERA submission on the legislation for the new agency, recommended these principles and practices as essential guidelines for JSA's work. This approach will ensure that the agency is inclusive, addresses the needs of women, and effectively tackles the barriers faced by individuals experiencing intersectional challenges in access to and equitable learning outcomes from VET and Adult Education to enhance their social and economic wellbeing.

The principles that underpin this new part of the workplan elements comprise:

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.

Lifelong 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 and pathways 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 acknowledge 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.

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:

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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.

PROGRAMS PROJECTS AND PRODUCTS

In line with the overall structure of the proposed workplan, WAVE advocates to JSA that the programs and products within the “intersectional gender equity” element:

- **Embeds equity into all aspects of the workplan** through utilising an intersectional gender equity approach
- **Add to the evidence base** through monitoring and evaluation of its programs, policies and impact that address intersectional and gender inequity in Australia’s skills and labour systems.
- **Identify drivers of intersectional gender inequity in our education and training system and address those drivers through capacity and capability building across the national system.**
- **Develop and recommend and provide advice on equity strategies** (gender equality action plans and Gender Impact Assessments) to address ongoing barriers to participation in our workforce and education and training system are developed across our education and training system. Equally 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 evaluating, designing and continuously improving **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 that in turn will benefit all our economy and society. JSA’s own processes should not “privilege” the advice of some education and training system users above others. JSA must engage with the full range of public, private, industry and community education settings to contribute to equitable and inclusive learning opportunities and pathways.
- Evaluate the overall outcomes of JSA’s work and how it contributes to **addressing the entrenched gender pay gap, and gender segregated labour market** (which is a key contributor to the pay gap).

Translated into the programs, projects and products framework, the new element in the workplan comprises the following components as per the diagram below.

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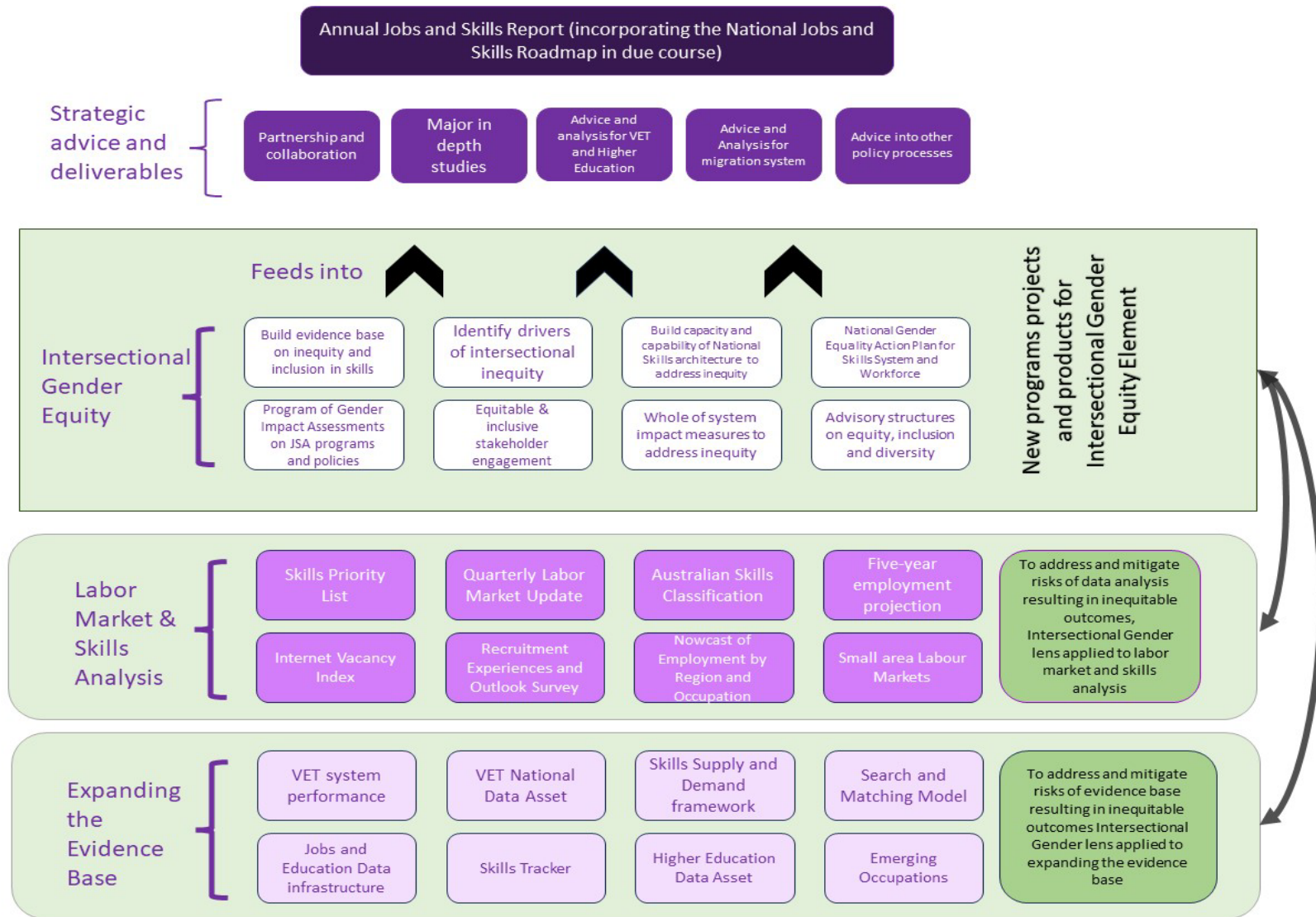


FIGURE 2 WAVE REVISIONING JSA PROGRAMS WITH NEW INTERSECTIONAL GENDER EQUITY WORKPLAN ELEMENT

The impact of new element and its resultant programs projects and products

WAVE appreciates that for some time, we have advocated that “equity must be at the centre of skills planning, research, design and development, implementation, monitoring and impact”.

JSA’s annual workplan development process provides a key opportunity to do this.

As a result of this new element being positioned in the concept of the JSA workplan:

- The **annual Jobs and Skills roadmap** would include the intersectional barriers to workforce and skills participation and put forward a strategic and collaborative outlook that identifies all pathways to addressing skill needs, including strategies for addressing intersectional barriers.
- **The insights and collaboration** on work undertaken by JSA to address intersectionality would be through and in **partnership with the JSCs**. Data collected by both JSA and the JSCs must be gender disaggregated and shared collaboratively. JSA would work with industries to determine industry specific and place-based responses to intersectional inequity
- **Labour market insights** would include barriers to labour market that are present due to compounding forms of disadvantage and oppression experienced by many Australians and migrants. It is crucial to identify and understand persistent points of inequity that may not be evident in the existing datasets and analysis. Additional analysis should be conducted to ensure better identification, understanding, and resolution of these inequities.
- **Advice given to Government** would include counsel on inequity and systemic barriers in the skills and education system, potential impact in workforces and the labour market and how to address these.
- **Major in-depth and capacity studies** would include studies on barriers to skills and labour force participation that drive systemic change, not just ad-hoc unaligned pieces of research and evidence gathering that isolates inequity as separate to addressing skills and labour shortages, and improving productivity. **Workforce profile studies** would all have an equity lens placed upon them.

Expanding our evidence base

WAVE welcomes JSA’s commitment to continuously improve the evidence base of the national VET Skills and Education system.

As regularly advised in WAVE’s other submissions, the current system of advice does not address equity challenges and barriers that are ever present in our system. The approach advocated for in this submission seeks to address this by delivering an intersectional lens on how the evidence base is expanded, and what gaps may need to be closed to ensure that the Australian system and JSA’s advice does not contribute to inequity.

Data presented and used in any labour market analysis and in “expanding the evidence base” must be disaggregated by gender, and intersectional experience as a matter of course. *Further JSA and the JSCs must take all steps to continuously improve the ability of our education and training data systems and reports to be disaggregated by gender and intersectional experience in the future.*

The opportunity in this design of JSA’s workplan development process is to put in place structures that ensure that the evidence base does not entrench a bias against equity. The additional element

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in the workplan concept framework, would enable JSA to understand if the data set that it draws on is robust and diverse enough to inform its work to address inequity.

An intersectional lens and centering lived experience through the new element would enable JSA to understand if the evidence base and underpinning assumptions that shape policy design are entrenching bias, and so take the necessary action through its workplan to create the enabling environment required to identify and address inequity.

For instance, WAVE asks:

- To what extent do the current projections on skill demand highlight gender bias in projections?
- Is the data used agnostic and gender blind to inequity or does it provide a platform for JSA to be transformative in its work?
- What biases and inequity lie in the assumptions that are made in matching supply and demand for skills?
- What barriers are built in to understanding occupations by tracking job advertisements?

Enabling Activities – Communication and Engagement

Communication and Enabling Activities

WAVE strongly recommends to JSA that the enabling activities that are undertaken develop a sustainable connection between those who are the end users of the national education and training system (students, current and potential employees and employers), and the system in which these end users gain their skills and knowledge.

Working with the JSA, WAVE envisages strong opportunity for JSA to develop the capacity of employers and end users on what the value of the system is, and what *employers role is to get the best out of the education and training system*. For instance, this includes:

- How to make use of the products and tools that JSA delivers in industry and the workplaces – what information and intelligence can be accessed, for what purpose and how (e.g. skills supply).
- Liaising with recruitment firms and networks to demonstrate how to use the tools that are produced by JSA (for instance the search and matching model).
- Encouraging capacity development of employers on how to work with new recruits, the value of employing new entrants to the labour market, and the difference between work ready and job ready.

The VET and national education system continues to suffer from unnecessary complexity, numerous entry barriers, and a lack of transparency for many individuals. We share an emerging perception that again, the ‘new’ skills system is becoming increasingly opaque, with a tendency for siloes within the system as well as between other related sectors and departments.

WAVE strongly recommends that JSA takes on the responsibility of building the capacity and capability of the national education and training system. JSA should clarify its role and inter-relationship with the roles of JSCs, the Government, and other parts of the system. While WAVE doesn't propose that the general public needs to understand every nuanced detail of national skills and education policies, it is important to actively promote awareness among key end users and

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stakeholders. This ensures that the narratives and messages that JSA and the JSCs are communicated effectively so they can be comprehended.

Engagement and Policy/Advice Design

Policy developers, including those in education and training, face a significant challenge in ensuring equity is at the core of policy design and development. In fields such as economics, health, social services and education, it is crucial that government-generated advice doesn't perpetuate inequality, cause harm, or create further inequity.

Participating in policy making and co-design processes is privileged work. Typically, only those with the time, authority, and resources can engage in such processes. Additionally, understanding and interpreting policy, identifying its flaws, and recognising opportunities for the community requires substantial skills and experience.

Considering this, WAVE urges JSA to examine which voices are absent from policy and engagement processes due to this privileged nature. We challenge JSA to determine which voices and perspectives hold power and privilege.

The new workplan element emphasizes the inclusion of an intersectional and gender lens in the design processes for engagement and advice. This ensures that JSA strives to engage diverse voices and promote inclusivity as much as possible. Without this approach, the advice provided to Government runs the risk of overlooking numerous barriers to workforce participation and skills development. *Without this approach, the views of stakeholders will not be balanced, deliver aligned outputs to the functions of JSA.*

WORKPLAN DEVELOPMENT PROCESS

With this in mind, WAVE makes the following recommendations on the proposed **Workplan Development Process**.

- A. The Environmental scan must be undertaken in a way that includes identification of intersectional barriers to workforce participation and skills development from the perspective of students, employees and potential employees. This must also be future focused taking into account global and regional trends, issues and examples of best practice.
- B. The development of workplan topic area must seek out input from students, educators and those disadvantaged in our skills, education and industrial environment.
- C. To effectively garner positive outcomes from Jobs and Skills Councils, and State and Territory Partners, a program of capacity and capability building needs to occur across the skills and education system, to enable these organisations and structures to similarly understand the intersectional barriers and challenges that prevent the development of productive workforces across all communities.
- D. Public submission processes must deliberately seek to be transparent and inclusive recognizing opportunities to encourage input and feedback from more diverse voices and perspectives will make for a stronger education and training system
- E. WAVE strongly advocates that the structures that provide advice to government on skills, must be redefined to ensure that the perspectives of industry, employers, employees, potential employees, students, educators and community are included. Further, these advice structures must be held accountable for ensuring that it does not privilege some voices in the education and training system above others. To do so puts at risk a robust process of national workforce planning based on limited insights into the multiple factors and drivers of workforce participation and skills development.
- F. To ensure that the JSA workplan is understood and consistently communicated, outreach activities should be planned in a way that is inclusive, and enables for equitable access and connection across Australia to JSA and its work.

A NOTE ON PREVIOUS ADVICE - STRUCTURES FOR JSA TO ENSURE AN EQUITABLE OUTCOME FOR AUSTRALIA'S EDUCATION AND TRAINING SYSTEM.

At this point WAVE would like to highlight previous advice that it provided with Equity Rights Alliance for a structure and governance approach that would enable the functions of JSA to be realised.

In this submission, WAVE seeks to reiterate this advice, as it will provide strong foundation for the agency to support a workplan development process that drives equity and equitable outcomes for Australia.

We continue to advocate 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 (NVEAC) 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.

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- B. Has a permanent ongoing Deputy Commissioner (or unit/area of work under a key leader) 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 lead role/unit will, among other things:
- Operate as a centre responsible and accountable for advice on equity including gender equality across the skills and training system.
 - Coordinate on those matters within the new education and training structures that will emerge from ongoing consultations with schools and higher education.
 - Generate publicly available 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. This needs to be used in the reporting of JSA as a matter of fact.
 - 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, the upcoming strategy on gender equality, and the forthcoming strategy on the Care and Support economy)
- D. Establish Key Performance Indicators to monitor, 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, National strategy to Achieve Gender Equality 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.

CONCLUSION

WAVE wants a VET and adult education system that provides high-quality learning opportunities for all women and girls, helps to grow our economy, and empowers all Australians to live well and contribute to the well-being of others and the planet.

WAVE's recommendations and advice are key to ensuring that JSA can put in place sustainable processes to ensure that risks to provision of poor advice including gaps in analysis and products, are mitigated.

We thank the Australian Government for considering our submission. As with all our submissions and advice to Government, WAVE will work with government, providers, industry, and the community to put learners' needs first in VET and adult education. This is essential because learners are currently not being adequately served, and our VET and adult education systems are not equitable.

-END

WAVE GLOSSARY OF TERMS

<i>When we say...</i>	What we mean is...	What we don't mean is...
<i>Vocational and Adult Education</i>	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. What draws this together is the enabling effect that these pathways of learning have on jobs and employment of women	We do not include in our definition university degrees or vocational pathways delivered by training providers in locations outside of Australia.
<i>The national vocational education & training system</i>	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/ 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	
<i>Technical Vocational Education & Training (TVET, VET)</i>	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, transversal skills and citizenship skills are integral components of TVET (UNESCO: 2016, 2022) ⁴ .	

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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 inequalities between women and men in responsibilities assigned, activities undertaken, access to and control over resources, as well as decision-making opportunities.</p>	

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	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.	
Empowerment of women	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.	
Intersectionality	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	
Gender transformative	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.” 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	

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<p>Gender Specific</p>	<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>	
<p>Gender sensitive</p>	<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>	
<p>Gender insensitive</p>	<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>	
<p>Traineeship</p>	<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>	
<p>Apprenticeship</p>	<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 base rates, including full allowances and entitlements. The qualification can vary from a Certificate II to an Advanced Diploma.</p>	

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Lifelong learning	<p>Lifelong learning is rooted in the integration of learning and living, covering lifelong (cradle to grave) and life-wide learning for people of all ages, delivered and undertaken through a variety of modalities and meeting a wide range of learning needs and demands. ... Education systems which promote lifelong learning adopt a holistic and sector-wide approach involving all sub- sectors and levels to ensure the provision of learning opportunities for all individuals.</p> <p>UNESCO Institute for Lifelong Learning (UIL) (n/d) <i>UNESCO Institute for Lifelong Learning Technical Note Lifelong Learning</i></p> <p>https://uil.unesco.org/fileadmin/keydocuments/LifelongLearning/en/UNESCOTechNotesLLL.pdf</p>	
Pathways	<p>'Pathways' is a metaphor used to describe the range of different routes that learners follow as they move into, through and out of an education and training system.</p> <p><i>Australian Government (2018) Education Learning & Development Module. DFAT Diplomatic Academy.</i> https://www.dfat.gov.au/sites/default/files/foundation-education-pathways.pdf</p> <p>The individual patterning of education-related transitions throughout the life course (Gorard et al., 1998, 2001; Pallas, 2003)</p> <p><i>Educational pathway: Work and Family Researchers Network (WFRN)</i> https://wfrn.org/glossary/educational-pathway-definition-of/</p>	