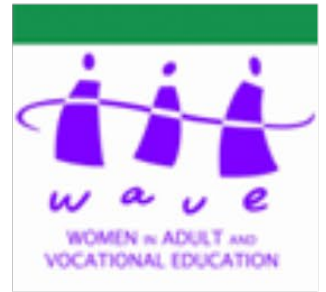


27th November 2022



Women in Adult and Vocational Education (WAVE)

# **RESPONSE TO CALLS FOR SUBMISSIONS TO TERMS OF REFERENCE FOR AUSTRALIAN GOVERNMENT'S EMPLOYMENT WHITE 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.

## Executive Summary

WAVE notes that “the Employment White Paper (the White Paper) will provide a roadmap for Australia to build a bigger, **better-trained** and more productive workforce – to boost incomes and living standards and create more opportunities for more Australians”<sup>1</sup>. While welcoming the intent of the White Paper and the opportunity to comment, WAVE does not support the proposed Terms of Reference (TOR) in their current form.

The terms of reference do not enable the White Paper process to put an intersectional gender lens on the needs of the Australian labour market and the national vocational and adult education system. Our national skills system reinforces the factors leading to our gender segregated workforce and therefore contributes to the barriers that women face to learn and earn.

Further, the TOR renders the symbiotic relationship between the economy and labour markets and our systems charged with skilling Australians opaque. We argue that the latter systems are intricately linked with and relevant to the White Paper's stated objectives, its scope and each of the listed themes.

Skills, VET and the national policy system that supports it should not be positioned as an afterthought (clause 5.3) to our nation's employment and productivity. It needs to be central to the White Paper process and as so, open to the structural and systemic changes required for it to be fit for purpose now and into the future.

WAVE joins with key voices in industry, research institutes and think tanks, the community sector and TAFE in calling for root and branch reform of the VET and adult education systems. The current VET system is neither equitable nor suitable for C21 Australia. The current system does not work for women. Rather, it reflects, reinforces and reproduces Australia's deeply gender segregated labour force - horizontally and vertically. Despite individual efforts by governments and other stakeholders, it has failed to contribute to gender equity and the reduction in the gender pay gap. The Terms of Reference, as outlined, frame the discussion in a way that merely tinkers with a status quo that is not meeting anyone's needs. It frames the needs of learners and their communities in contrast to the needs of industry, when these things are symbiotic.

WAVE calls for a high level review of the VET and Adult Education systems, similar to that proposed for Higher Education. Such a review should put equity at its heart rather than adding it as an afterthought.

We have confined our responses below to those areas where the TOR align with our agenda to improve equity for women in Australia's skilling and education system.

## Key Contacts:

### National Co-Convenors

Therese Nolan and Kit McMahon  
Women and Vocational Education and Training  
wave@wave.org.au

---

<sup>1</sup> Employment White Paper – Consultation: <https://treasury.gov.au/consultation/c2022-322158> (Our emphasis)

# TABLE OF CONTENTS

Acknowledgement .....	1
Executive Summary.....	2
Key Contacts: .....	2
Table of Contents.....	3
Introduction .....	4
Who is WAVE?.....	4
Our Way of Working .....	4
Context of our feedback .....	4
A note on international frameworks and agreements .....	5
MAKE our National Skills System Equitable.....	6
Recommendations for the Australian Government .....	6
Our Support for Peers .....	7
Evidence of the challenge - Gender Inequity in our Skills and Labour Systems .....	8
There is gender inequity in work and learning .....	8
The Pay Gap and the Education Sector.....	9
Australia's Skill System reflects, reinforces and reproduces our gendered workforce .....	9
VET is a Gendered Sector.....	11
Capital Invested in skills development is gendered.....	13
Gender Analysis .....	13
What is the value of analysing VET Apprenticeship and Traineeship Price? .....	14
Our Skills System does not account for or support the lived experience of women and work ...	17
Gendered Experience through Reasons for Leaving.....	17
Defining the Problem - Gender Inequity in our Skills and Labour Systems .....	19
Response to Scope and Themes .....	20
Change the Terms of Reference.....	20
Response to the Approach.....	21
Ensure alignment and connection to the forthcoming National Strategy to Achieve Gender Equality .....	22
Response to Structure and Timing.....	22
WAVE Glossary of Terms.....	24

## INTRODUCTION

### 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 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.

### 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 should to all components of the Terms of Reference and the White Paper process.

By applying an intersectional gender lens across all aspects of the White Paper's Terms of Reference 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 all<sup>2</sup>), 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 education<sup>3</sup>, the commitments made in Australia's submission at the Transforming Education Summit (TES) convened in September 2022 in response to a global crisis in education. The *National Statement of Commitment*<sup>4</sup> 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.

---

<sup>2</sup> SDG4 is supported by 10 targets & 11 indicators. Those that are relevant to VET and adult education are targets 4.3 - 4.7.

<sup>3</sup> See: UNESCO *Futures of education* for detail & associated publications <https://en.unesco.org/futuresofeducation/>

<sup>4</sup> Australian Government (2022) *National Statement of Commitment to Transform Education*. 14<sup>th</sup> October 2022 <https://transformingeducationsummit.sdg4education2030.org/AustraliaNationalStatement>

## MAKE OUR NATIONAL SKILLS SYSTEM EQUITABLE

*There is strong consistent evidence that Australia's vocational and adult education system is not equitable. Rather, its foundations and underlying assumptions are based on norms, systems and structures emerging from the first and second industrial age which are highly gendered, inequitable and not in keeping with Industry 5.0 which is sustainable, human-centric and seeks to preserve resources and create social stability.*

While it may appear that men and women participate in equal numbers in our VET system, this does not reflect the outcomes or reality of the experience, funding, outcomes and returns to people of different genders and intersectional experience.

The disparity in the VET system in Australia both reflects and reinforces to our highly segregated labour market. This needs to be addressed in the White Paper process if Australia is going to address the negative impacts to our economy and society of our gender segregated labour market.

## Recommendations for the Australian Government

### A. Change Terms of Reference

WAVE recommends that the objectives, scope and themes of the White Paper reflect the need for an intersectional gender lens to be applied to:

1. The enablers of participation in our workforce through our skills, secondary schooling and adult education systems; and
2. The policy, systems and settings that retain skills in our labour market through reskilling/upskilling and other education and training.

### B. Drive the creation of Gender Equity in our VET and Adult Education System

Australia's vocational and adult education system needs to deeply appreciate and address the reality and the impact of inequity, so that it can create learning environments, skills policy and practice that benefit everyone.

WAVE recommends that a new body within the emerging VET architecture be established and empowered to drive an intersectional approach across the vocational and adult education sector with the capacity to apply gender lens in its work

The Vocational and Adult Training system can address the segregation in our labour markets by ensuring that within its own systems, programs, services and policies:

1. Are built on principles of equity and human rights
2. Seek to disrupt and disband the reproduction of gender stereotypes across national systems and structures that undermine the productivity of our labour market and utilisation of skills
3. Incorporate co-design and place-based methodologies

4. The capacity of skills, workforce development and adult education sectors and system is developed to be more inclusive, sustainable, productive, flexible and aligned to our community needs and emerging economic, environmental & socio-cultural challenges
5. Create safer and more equitable adult and vocational education system that delivers for all students, communities and industry
6. Establish and commit to lifewide and lifelong learning pathways through an overarching lifelong learning framework
7. Commit to develop our national adult language, literacy and numeracy capability
8. Use gender disaggregated data to plan for and forecast labour and skills needs and, measure effectiveness of the student's journey and outcome
9. Are designed and implemented through gender impact assessment process
10. The inequitable nature of the vocational and adult education workforce is addressed

## Our Support for Peers

WAVE also notes its support for submissions made to the Australian Government for this Terms of Reference from:

- Equality Rights Alliance (ERA)
- Australian Coalition for Education and Development (ACED)

We note that there have been many organisations that have provided comment to this opportunity provided by the Australian Government and thank those organisations that took the time and effort to examine and highlight the opportunity that we have to address our inequitable and gender segregated labour market and skills system and the negative impacts that this has for all Australians.



## EVIDENCE OF THE CHALLENGE - GENDER INEQUITY IN OUR SKILLS AND LABOUR SYSTEMS

*A key challenge that the Federal Government can address through the White Paper process is the inequitable vocational and adult education system across Australia.*

There is a range of evidence to show this to be true.

### There is gender inequity in work and learning

While WAVE appreciates the strong emphasis on increasing female labour force participation, the question must be asked whether, rather than participation alone, the real issue is that of access to quality work for women. As recently as the 10<sup>th</sup> of November 2022, the Australian Bureau of Statistics released data on engagement in work and/or study <sup>5</sup>

At a headline level it tells us that of the 14.5 million Australians that were engaged (partially or fully) in work and or study (15-74 years):

- 71% of men were fully engaged in work and/or study.
- 50% of women were fully engaged.

More women (16.8%) than men (14.6%) were enrolled in study (again 15 to 74 years) and notably of those enrolled in non-school qualification, more women than men studied in degrees (Bachelor Degrees 39.7% women to 38.3% men; post graduate degrees 20.6% women to 16% men) and diploma/advanced diploma levels (12% women to 11.6% men) with more men (27%) studying at Certificate III and IV level than women (17.8%) This gendered segregation is even more pronounced when one considers that overall there is a relatively even split between men and women with a non-school qualification (between the ages of 15-74 – 63.1% men and 63.3% women). Interestingly of all people with education:

- Women aged 15-74 hold more bachelor degrees than men – 35.2% women to 28.8% men
- Men aged 15-74 years hold more certificate/Diploma/Advanced Diploma (32.7% men) than women (26.6% women)

What is also powerful to understand through the ABS release is that the education of women is not translating through to well paid secure work. We can see this in through the Labour force status by non-school qualifications

- Women with Bachelor level more likely to work part time (26.1% women to 11.4% men), are more likely to not be in the labour force (19.1% women to 13.1% men)
- Women with qualifications “below bachelor level (AQF 3 4 and 5 to 6) are much more likely to work part time than men (32.3% women to 11.2% men) and are much more likely to not be in the labour force (25.6% women to 17.3% men)

The gendered segregation of participation in study is also reflected in the field of study where we note that:

- Men overwhelmingly study in engineering and related technologies (20.4% to 2.7% women); architecture and building (9.3% men to 1.9% women) and in information technology (6.3% men to 1.6% women)

---

<sup>5</sup> ABS, Education and Work, Australia (May 2022) <https://www.abs.gov.au/statistics/people/education/education-and-work-australia/latest-release>

- Women are overwhelmingly represented in health (22.4% women to 1.6% men), education (10% women to 3.5% men) and, society and culture (27.5% women to 14.9% men)

The ABS also notes that “442,000 people were studying for a non-school qualification in a science, technology, engineering or mathematics (STEM) field. Almost three-quarters (73%) of current STEM students were men.” And further that “While 82% of architecture and building students were men, reflecting the overall STEM trend, 73% of all students studying for a non-school qualification in health were women.”

In addition to this, the ABS release also noted that of the 297,00 people “aged 15-74 years were employed as apprentices or trainees (including school-based apprentices or trainees) 75% were male”.

## The Pay Gap and the Education Sector

The BCEC/WGEA 2022 *Gender Equity Insights* report<sup>6</sup> reflects further the segregation in our workforces, and also emphasises how other intersectional factors impact the inequity that women face. Based on the reporting power of over 4,000 organisations with over 100 employees reporting to WGEA since 2013, this latest report finds that:

- Pay inequity increases with remoteness where “women face a remoteness penalty in the remuneration they can access when working in regional areas of the country ...the gap rises steadily to 28.2% for those working in remote areas and to 29.3% for those working in very remote areas” (pp. 8, 17)
- Pay differentials change with age but are significant in some industries: “Remuneration for women and men in the construction sector diverges from the age of 20, with the construction gender pay gap rising to more than 35 per cent beyond the age of 45. (noting that) “it is almost always the case that women aged 55 and over face larger differences in remuneration than their male contemporaries, compared to younger cohorts.” (p.9)

The other key finding of the 2022 *Insights* report is the significant impact of two factors - “gender concentration” within industries and the reality of different “remuneration between female dominated and male dominated industries”. The data<sup>7</sup> show that these compounding forms of inequity in the workforce have massive impacts across Australia. For instance, the significant pay gap found in Western Australia is the largest in Australia – at 32.1%. This is not only because of the gender concentration in mining and their high salaries, it is also because of the concentration of women in the health care and social sectors which contributes around 16% to that gap. (Mining contributes 19%).

## Australia's Skill System reflects, reinforces and reproduces our gendered workforce

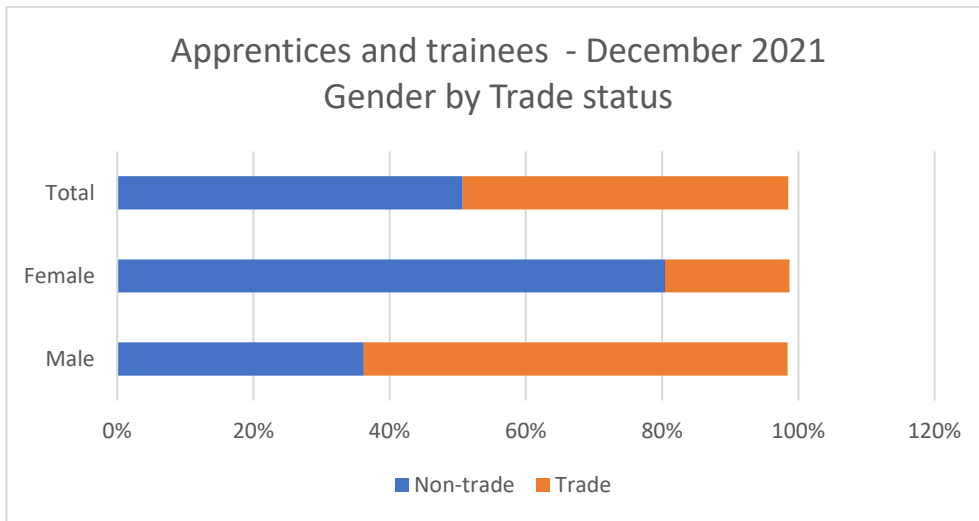
The recent submission provided by WAVE and Gender Equity Victoria to the Senate Inquiry into Jobs and Skills Australia highlights evidence about how our skills system perpetuates inequity and our gendered segregated labour market.

On the latest NCVER Figures we can see that men overwhelmingly occupy “trade” qualifications:

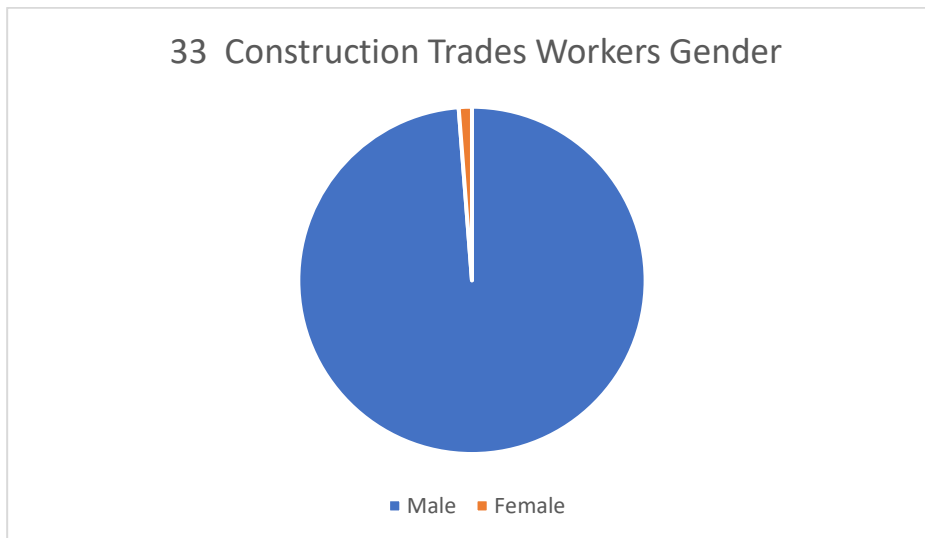
---

<sup>6</sup> Duncan, Alan; Mavisakalyan, Astghik And Salazar, Silvia (2022) *Gender Equity Insights 2022: The State of Inequality in Australia*. BCEC/WGEA Gender Equity Insights Series, Issue #7. October 2022. Bankwest Curtin economics Centre (BCEC). <https://bcec.edu.au/publications/gender-equity-insights-2022-the-state-of-inequality-in-australia/>

<sup>7</sup> Ibid. See pp. 10, 15-16, 31-32, 35-

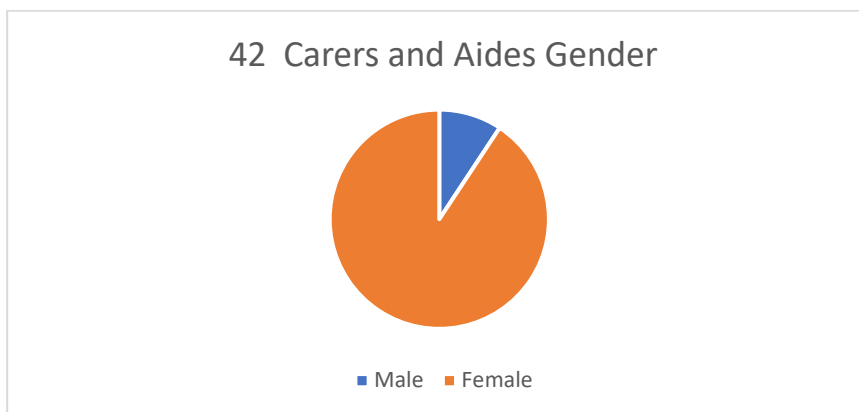


**FIGURE 1 NCVER APPRENTICES AND TRAINEES - DECEMBER 2021 x GENDER x VOCSTATS**



**FIGURE 2 NCVER APPRENTICES AND TRAINEES - DECEMBER 2021 (OCCUPATION (ANZSCO - NTIS) GROUP BY GENDER - 33 CONSTRUCTION TRADES VIA VOCSTATS**

And women in the Carer and Aide courses:



**FIGURE 3 NCVER APPRENTICES AND TRAINEES - DECEMBER 2021 OCCUPATION (ANZSCO - NTIS) GROUP BY GENDER 42 CARERS AND AIDES**

These both reflect the prevailing industry and occupational job segregation as reported by the Australian Bureau of Statistics where Health care and social assistance had the highest proportion of women (77.9%) whereas Construction had the highest proportion of men (87.3%).<sup>8</sup> In addition the following graph shows the **percentage of women and men employed in two of the most gendered industries** – Health care and social assistance (feminised) and Construction (male-dominated) over the last 5 years. By reading the data with a gender lens, we can compare how segregated the sectors are, noting the intransigence in this segregation over that time period.

Percentage Comparison of Male vs Female Employment: Construction and Health Care & Social Assistance Sectors 2016-2020

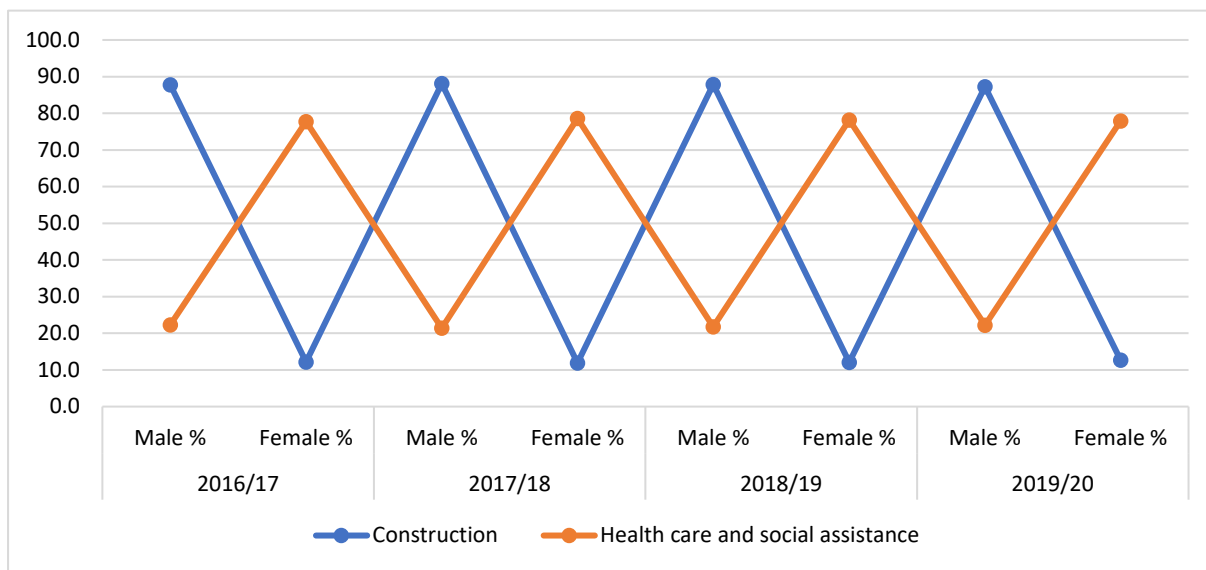


FIGURE 4 EMPLOYMENT BY INDUSTRY. TAKEN FROM ABS CONSTRUCTION SECTOR AND HEALTH CARE & SOCIAL ASSISTANCE SECTOR.<sup>9</sup>

## VET is a Gendered Sector

The sector itself is inequitable.

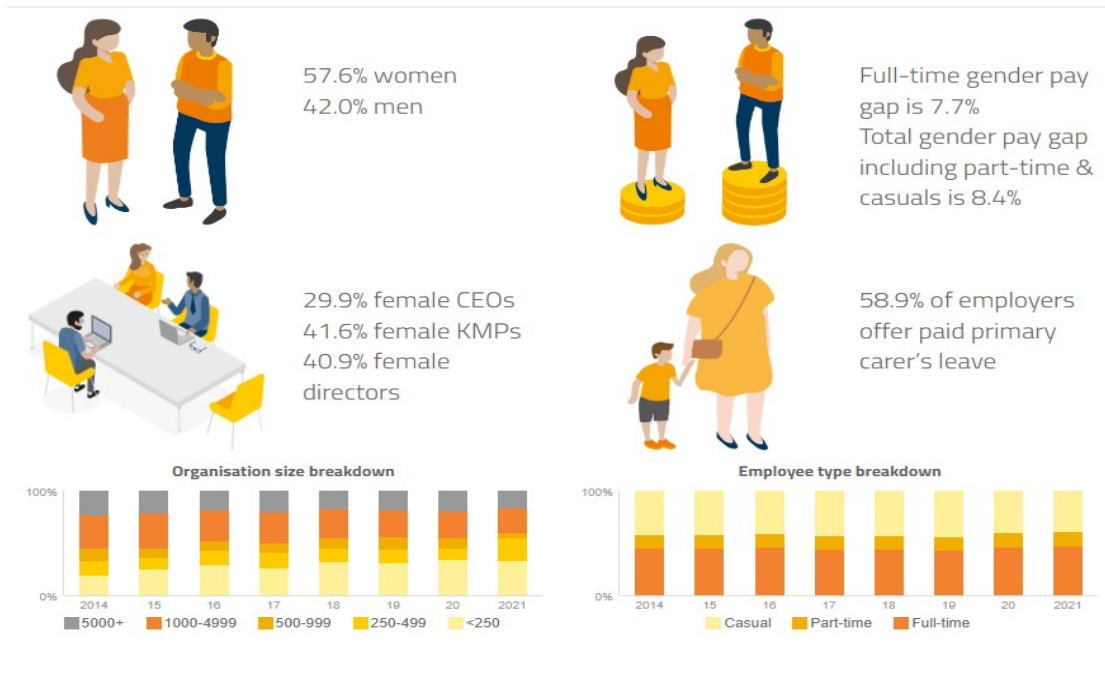
This is important because the sector that itself is unaware, unwilling or unable to address its own gender inequity will struggle to provide a platform to support gender equity in the programs and learning it provides.

WGEA tells us that for the tertiary education sector – the most representative of education organisations delivering skills programs including vocational education and training – that while the majority of employees are women, the majority of those in leadership are male, and the pay gap is 8.4% as seen in the graph below.<sup>10</sup>

<sup>8</sup> <https://www.abs.gov.au/statistics/people/people-and-communities/gender-indicators-australia/latest-release#key-series-and-indicators>

<sup>9</sup> <https://www.abs.gov.au/statistics/people/people-and-communities/gender-indicators-australia/latest-release#key-series-and-indicators> .

<sup>10</sup> Workplace Gender Equality Agency – Tertiary Education within Education and Training Summary Diagram of 232,075 employees within 107 organisations of any size. As at 17/08/2022

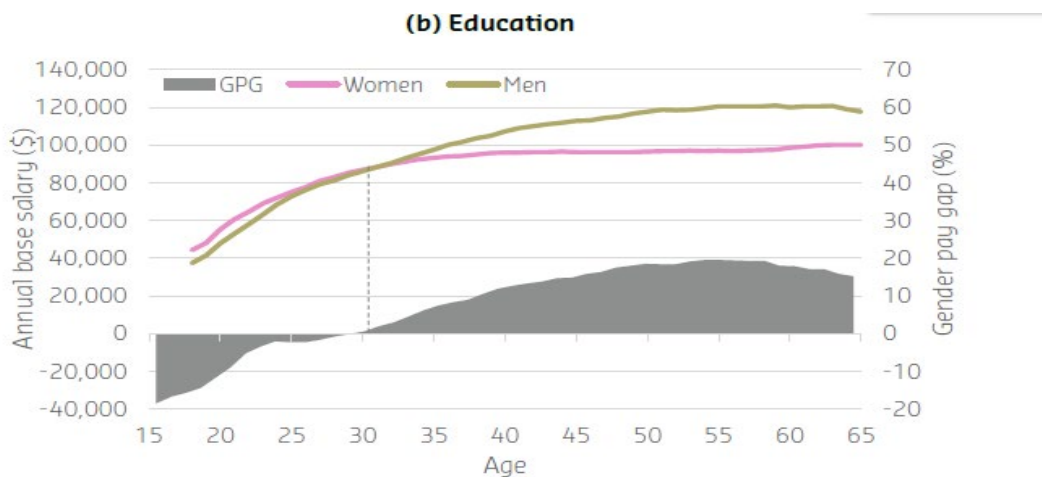


**FIGURE 7 WORKPLACE GENDER EQUALITY AGENCY – TERTIARY EDUCATION WITHIN EDUCATION AND TRAINING SUMMARY DIAGRAM OF 232,075 EMPLOYEES WITHIN 107 ORGANISATIONS OF ANY SIZE. AS AT 17/08/2022**

We also know from the 2022 BCEC/WGEA *Gender Equity Insights* Report that:

*While the gender pay gap in education and training is in favour of women up to the age of 30 (it "...crosses thereafter as men start to earn more on average than women, resulting in a gender pay gap that touches 20 per cent by the age of 55."*<sup>11</sup>

The report illustrates this as follows (where GPG stands for gender pay gap)



**FIGURE 22(B) DUNCAN ET AL (2022), GENDER EQUITY INSIGHTS REPORT 2022. BCEC/WGEA P.54. AGE EARNINGS PROFILES BY GENDER FOR EDUCATION 2020-2021**

<sup>11</sup> Duncab etal/WGEA/BCEC 2022, p.9

## Capital Invested in skills development is gendered

In response to ongoing concerns from policy and the public on the inconsistent pricing approach of vocational education and training qualifications, the National Skills Commission (NSC) undertook a project to review the pricing and subsidy structure and understand the cost drivers. The first public output of this project was their 2021 report *VET average price benchmarks: Findings from the national VET average price benchmark database*<sup>12</sup>. The NSC's analysis revealed that across VET, there is variance across the states and territories (jurisdictions) on:

- Government subsidies for qualifications and students
- How much the subsidy contributes to the full price of the qualification
- Standardised schedules
- Difference between private and public funding/price
- Collection of fee data

Significantly, these variations exist “despite all jurisdictions basing their subsidies....On the cost of delivery [and with] similarities in cost calculations.” The major differences across jurisdictions lie in the application of cost per hour, number of hours funded and portion of the final price that is subsidised by jurisdictions.

The dataset used by the NSC leads to a number of revelations in the final analysis. The NSC reported that 17,000 observations were made across 2,000 qualifications and national skill sets.

Working with Deloitte Access Economics, the analysis focused on 50 “priority qualifications” as identified by the 2018 government-funded enrolments for ‘standard students’. A standard student is defined as metropolitan-based, does not identify as Aboriginal or Torres Strait Islander, does not have a disability and is not long-term unemployed.

### Gender Analysis

This analysis only focuses on the disparity of pricing on gender which we acknowledge is only one part of a broader set of characteristics and lived experience of individuals that overlap to create systems of disadvantage. Applying an intersectional lens across the data (in this case, the NSC Pricing analysis) would be more valuable than a gender lens for understanding how pricing impacts on students and their futures.

Across all analyses, data is key. At this moment, this paper is drawing upon available NCVER data which typically has been disaggregated by gender.

The data selected has been chosen mainly due to the ability of the authors to access and analyse publicly available data on the qualifications that the NSC report refers to. Our analysis focuses on the apprenticeship and traineeship pricing as a start with the hope that this initial review can start a conversation about pricing and its impact on current and potential workers from a gender perspective. In effect, this analysis briefly looks at the price signal expressed for apprenticeship and traineeships through a gender lens.

---

<sup>12</sup> National Skills Commission (NSC) (2021) *Average Price Benchmarks. Findings from the national VET average price benchmark database*. 26 March 2021 Australian Government National Skills Commission  
<https://www.nationalskillscommission.gov.au/publications/average-price-benchmarking-report>

### Subsidy and fee composition of national average price, top 10 qualifications (A/T Only)

Table 1 applies a gender lens to the top 10 qualifications by observing the level of female enrolment (Commencement information from 2018 from NCVET) in the qualifications analysed by the NSC. The order of qualifications in Table 1 aligns to the percentage of women enrolled in the qualification.

**Table 1 Costings for Qualifications and the Proportion of Women Enrolled.**

Qualification	Apprenticeship /Traineeship?		Subsidy (%)	Fee (%)	Average Price	Women Enrolled
Diploma of Early Childhood Education and Care	A/T		91%	9%	\$6,600	95%
Certificate III in Business Administration	A/T		88%	12%	\$4,100	89%
Certificate III in Individual Support	A/T		89%	11%	\$5,800	84%
Certificate III in Hospitality	A/T		88%	12%	\$4,500	63%
Certificate II in Kitchen Operations	A/T		80%	20%	\$3,700	36%
Certificate III in Electrotechnology Electrician	A/T		93%	7%	\$16,000	3%
Certificate III in Carpentry	A/T		95%	5%	\$15,100	1.95%
Certificate III in Plumbing	A/T		95%	5%	\$21,700	1.22%

**TABLE 1 NATIONAL SKILLS COMMISSION 2021 VET AVERAGE PRICE BENCHMARKS: FINDINGS FROM THE NATIONAL VET AVERAGE PRICE BENCHMARK DATABASE STUDENT FEES AND SUBSIDIES COMPARED WITH PROPORTION OF WOMEN ENROLLED (NCVER ENROLMENT DATA FOR SAME YEAR)**

As can be seen in Table 1, the qualifications with higher levels of female participation are those that tend to attract less subsidy (with the exception of the Diploma of Early Childhood Education). Furthermore, the qualifications with significantly fewer female enrolments (e.g., under 3%) have two to three times higher average price.

### What is the value of analysing VET Apprenticeship and Traineeship Price?

The VET sector is consistently referred to as a market<sup>13</sup> (Zoellner 2022; Simon & Butler, 2015). Often governments release reports about the market and how it is tracking for improving skills for our economy. For instance, in January 2021, the Victorian Government released a report on the training market highlighting<sup>14</sup> growth and movements in enrolment. The indicator of enrolments is used in these reports as an indicator of value, of “the impact of the COVID-19 crisis”, of the success of such initiatives such as “free TAFE”, and “continuing enrolments” and “positive trends in greater participation” across a range of programs and providers. While a similar report has not been

<sup>13</sup> See, for example: Zoellner, D (2022), “Mature Australian VET markets: A data driven case study of public policy implementation” in *Empirical research in Vocational Education and Training* (2022) 14.5 <https://doi.org/10.1186/s40461-022-00133-7>; Simon L & Butler E (2015) ‘Market rules? Where are women in skills provision in 21<sup>st</sup> century vocational education and training?’ NCVET No Frills Conference 2015. <https://wave.org.au/market-rules/>

<sup>14</sup> Victorian Government *Training Market Highlights Half Year 2020* <https://www.education.vic.gov.au/training/providers/market/Pages/reports.aspx>

produced for some time, in 2012 Deloitte Access Economics worked with Victorian Industry Training Advisory Bodies (ITABs) to produce the *2012 ITAB Market Effectiveness Report* to present an overview of skill needs in the Victorian economy, including analysis of occupations in demand and experiencing critical skill shortages, and to provide a summary of market effectiveness in the Victorian market for vocational education and training.”(p,1) The report summarises several examples of market failure and market success. While the specifics of that report are not for discussion here, the intent of the VET sector as a market may go some way to helping understand the importance of noting the impact of evaluating pricing from a gender lens.

While it is not clear from the NSC analysis what the “price” of qualification means, from an economic perspective, pricing has a very specific role. In a market, it is a way for consumers to indicate demand and a signal for producers of services and goods about the change in demand. It does indicate a value for a product and a service at the very least by consumers. What is not clear in our analysis, however, is who is the consumer and who is the producer.

From a gender perspective, the evidence indicates that the pricing is not delivering equitable access to the skill. If anything, it could be argued that the pricing is not generating equitable access for jobs/roles.

This observation is more pronounced when one compares female commencements across all the qualifications that the NSC have analysed in their pricing report. When we look at what the data says, women are represented in apprenticeship enrolments with the lower price per qualification, whereas men are significantly represented (often above 80%) in those qualifications that attract a higher price.

We can also see that even from the point of view of funding, there is inequity in the resourcing of courses/skills that have more commencements by males than females.



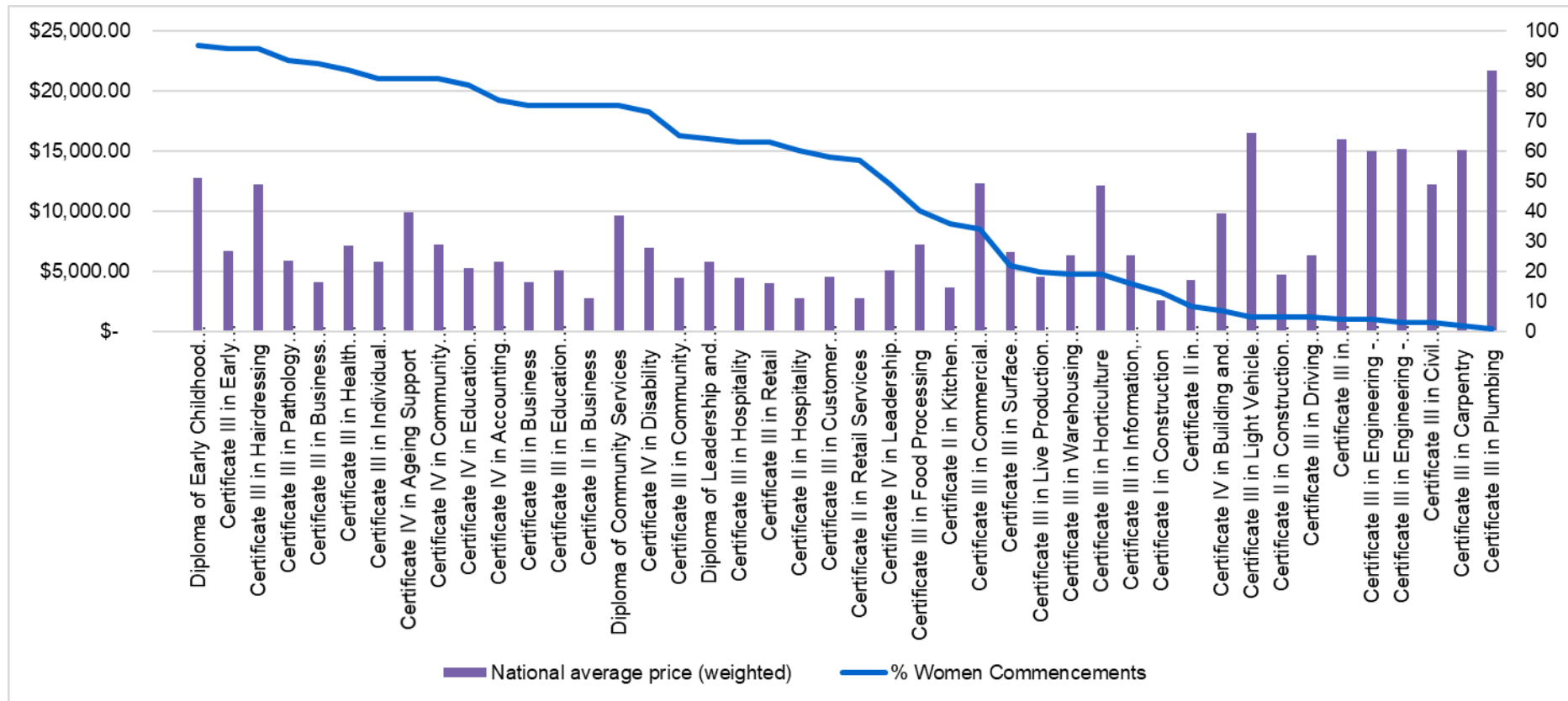


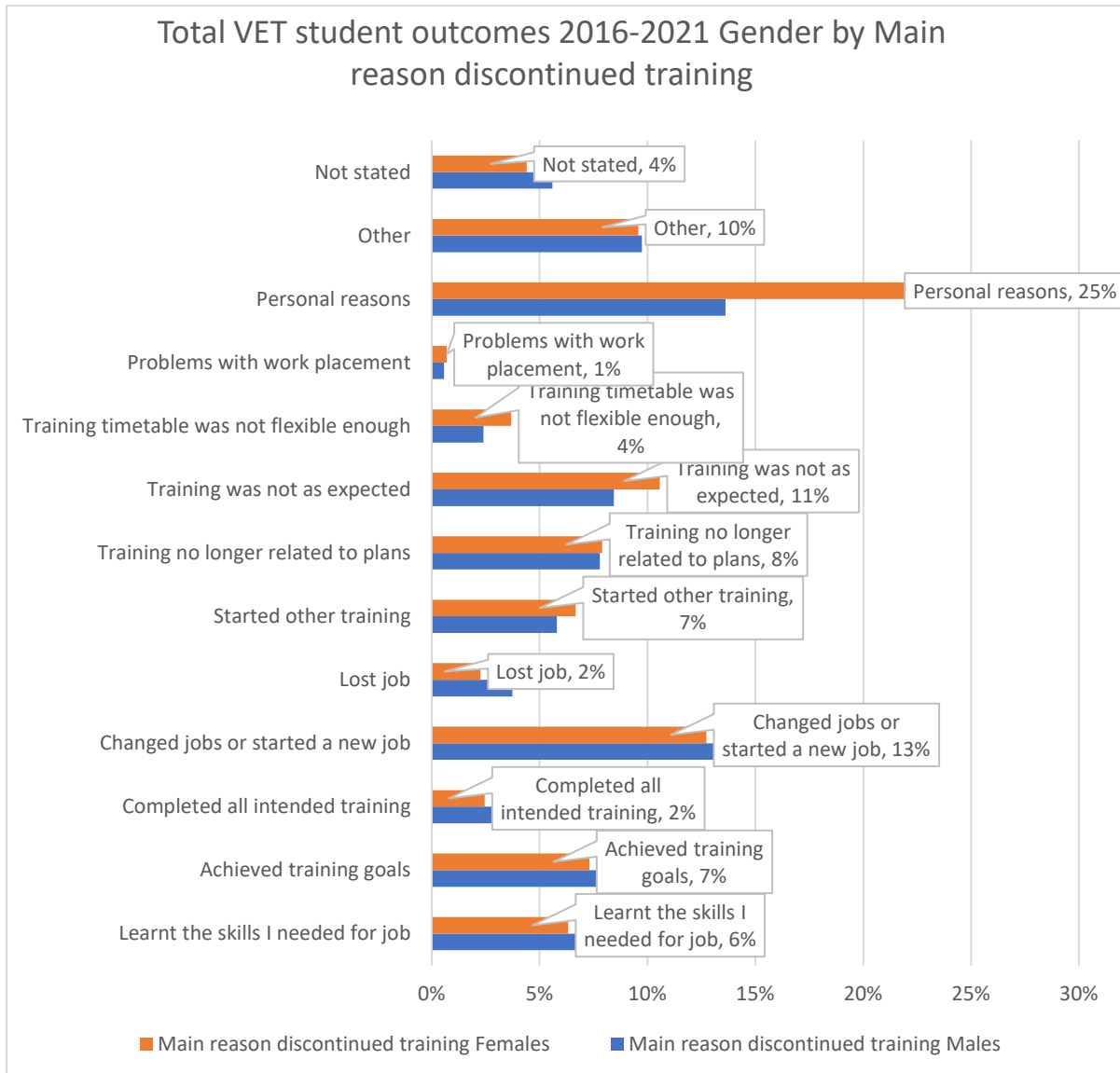
FIGURE 5 NATIONAL AVERAGE PRICE BY FEMALE COMMENCEMENTS. ADAPTED FROM NATIONAL SKILLS COMMISSION (2021) VET AVERAGE PRICE BENCHMARKS (TABLE C1, P.18) COMBINED WITH NCVET DATA.

## Our Skills System does not account for or support the lived experience of women and work

### Gendered Experience through Reasons for Leaving

Another gendered experience is the participation in and completion of learning. While there is overall equitable positive experience about the learning itself (based only on NCVER data) gender stereotypes and other barriers that impact women and their participation in work and learning are seen in reasons for leaving.

Overwhelmingly women leave training for “personal reasons” and lack of flexibility, whereas men for employment and because the goals of the training were achieved.



**FIGURE 6 NCVER TOTAL VET STUDENT OUTCOMES 2016-2021 GENDER BY MAIN REASON DISCONTINUED TRAINING VIA VOCSTATS**

While there is nothing further that we can learn from this response (no further disaggregation of the responses to the NCVET survey to understand what those personal reasons are) we know from other evidence that these reasons are more likely to be associated with:

- The impact that care has on mental health and wellbeing of women – research and review of evidence on the impact that caregiving has on women found that when examined from the point of view of gender, there is a negative impact on women's mental health.<sup>15</sup>
- The extra burden of unpaid work that women do in Australia – while prior to the pandemic, according to the 2021 Household Income and Labour Dynamics in Australia (HILDA) report women are doing 21 hours more unpaid work than men a weeks<sup>16</sup>
- The significant burden of care that women carry in the community. While included in the definition of HILDA's "Unpaid work" it is also worth noting that the Australian Bureau of Statistics states that based on the 2020-2021 Time Use Survey:<sup>17</sup>
  - "On average, females spent 4 hours and 31 minutes a day doing unpaid work activities. Males spent over an hour less on these activities, averaging 3 hours and 12 minutes a day. Less than half of males (42 per cent) spent time on housework, compared to 70 per cent of females.
  - "Mothers spent an average of 3 hours and 34 minutes participating in child care activities a day, while fathers spent 2 hours and 19 minutes".
  - "Of those who spent time doing employment related activities, males spent 8 hours and 13 minutes in a day on these activities, compared to females who spent 7 hours and 12 minutes."

---

15 Ervin, J. J., Taouk, Y. Y., Fleitas Alfonso, L. L., Peasgood, T. T., & King, T. T. (2022). Longitudinal association between informal unpaid caregiving and mental health amongst working age adults in high-income OECD countries: A systematic review. *EClinicalMedicine*, 53. <https://doi.org/10.1016/j.eclinm.2022.101711>

16 Wilkins, Rodger et al The Household Income and Labour Dynamics in Australia Survey: Selected Findings from Waves 1 to 19 (The 16th Annual Statistical Report of the HILDA Survey) Melbourne Institute: Applied Economic and Social Research, The University of Melbourne 2021

17 Australian Bureau of Statistics, "Females do more unpaid work, males do more paid work" Media Release 7th October 2022

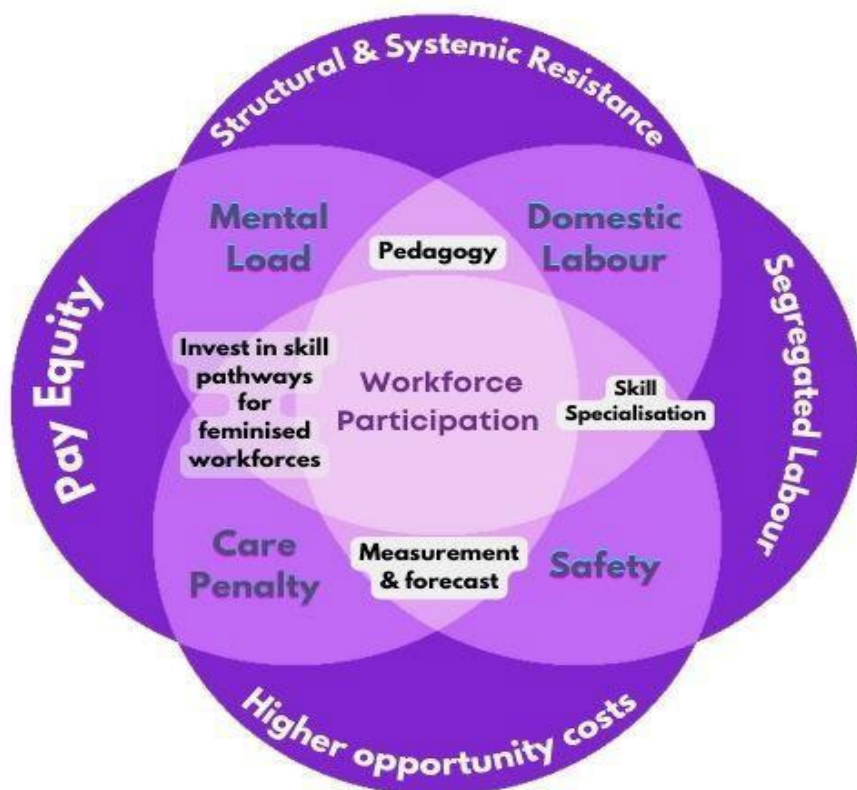
## DEFINING THE PROBLEM - GENDER INEQUITY IN OUR SKILLS AND LABOUR SYSTEMS

*Australia's vocational and adult education system is presently disconnected from the realities of women's and girls' lived experience in our communities, society and economy.*

Despite the significant evidence and practice available to it, our national education and training skills system does not deeply understand and engage with the fact that:

- the Australian workplace is significantly less safe for women than men – including their educational environments, and this is reflected in the gender wage gap
- when girls encounter gendered obstacles embarking on their career path while at school, their likelihood of overcoming their first negative experience is low without added support
- a key driver of homelessness and unemployment in our community for women is not lack of skills or willingness to work but discrimination and, at its worst, violence against women and their children
- women, overwhelmingly more than men, carry a significant unpaid care burden in our community leading to barriers in not only their participation in the workforce, but their participation and completion of training
- in effect, the opportunity cost for women to educate themselves in vocational skills is higher than that of men, and this is in part a consequence of the funding model that favours male dominated skills development

In summary, the ecosystem of systems and structures that envelopes women and their participation in our workforce and skills system presents a set of barriers that need to be both understood and incorporated into any planning and activity to build equity in our national skills policy. The following graphic seeks to describe these barriers



## RESPONSE TO SCOPE AND THEMES

### Change the Terms of Reference

Based on the above, and in line with international policies and best practice, WAVE recommends that the scope and themes of the White Paper reflect the need for an intersectional gender lens to be applied to:

1. The enablers of participation in our workforce through our skills, secondary schooling and adult education systems; and
2. The policy, systems and settings that retain skills in our labour market through reskilling/upskilling and other training.

We recommend that the scope and themes be amended for the following (additions/amendments from WAVE in red):

1. Full employment and increasing labour productivity growth and incomes, including the approach to achieving these objectives. **NO CHANGE**
2. The future of work and labour market implications of structural change, with a focus on: **NO CHANGE**
  - 2.1 Building a sustainable care economy in the context of an ageing population and other drivers of demand for care services.
  - 2.2 The energy transition and tackling climate change to achieve net zero.
  - 2.3 The transformation associated with digitalisation and emerging technologies.
  - 2.5 The adaptability of our workforce to meet the needs of emerging industries and areas of traditional economic strength.
3. Job security, fair pay and conditions, including the role of workplace relations. **NO CHANGE**
4. Pay equity, including the gender pay gap, equal opportunities for women and the benefits of a more inclusive workforce **including addressing gender segregated labour markets.**
5. Labour force participation, labour supply and improving employment opportunities **with both quotas and incentives for the training and inclusion of women in government funded infrastructure projects and supporting girls in senior secondary schooling to engage with career opportunities in male dominated industries through vocational education training systems.**
  - 5.1 Reducing barriers and disincentives to work, including the role of childcare, social security settings and employment services **and the gendered impact of these services and programs on reducing barriers to work.**
  - 5.2 Improving labour market outcomes for those who face challenges in employment, including First Nations people, young girls, those who live in rural and remote areas, younger and older Australians, people with disability, and those who may experience discrimination **noting the gendered reality for women seeking to engage with the labour market across the life course .**
  - 5.3 Skills, education and training, upskilling and reskilling, including in transitioning sectors and regions, **the inequity in our national skills and workforce development systems and incentive structures that contribute to barriers to workforce participation, career paths to decent work and the pay gap for women and girls.**

- 5.4 Migration settings as a complement to the domestic workforce **including the impact of gender inequity in our migrant/skilled migration programs and how this impacts our community and economy.**
6. The role of collaborative partnerships between governments, industry, unions, civil society groups and communities, including place-based approaches. **NO CHANGE**
  7. Other relevant topics and approaches. **NO CHANGE**

## Response to the Approach

The following comments are made with regard to the following items in the Terms of Reference:

8. The development of the White Paper will be led by the Employment Taskforce in Treasury, in consultation with other departments and **in partnership with key stakeholders, equity experts and those with lived experience of the national vocational and adult education system and its inherent inequity. We also strongly argue that the development of the White Paper be synchronised with and cognisant of findings of reviews and inquiries in the education, training and skills sectors.**
9. The White Paper will be underpinned by rigorous data and evidence, relevant international comparisons, and stakeholder submissions and engagement **including data and evidence that relate to inequity and inequality ensuring that all data used are gender disaggregated. Further, commitments made by Australia in International agreements cited earlier in this response will be accounted for.**

**Consultations and leadership processes for this White Paper process need to centre on lived experience and not use engagement methodologies that discriminate against women and girls' participation and recognition in the White Paper process**

WAVE notes that the consultation process for the White Paper will be led by a Taskforce in Treasury, in consultation with other departments. From our perspective we request that a set of guiding principles on the proposed consultation process and its leadership be made available so that we can understand the voices that are privileged and the lived experience being recognised.

From the perspective of intersectional gender equity, WAVE (as well as other organisations) keenly understands the gendered nature of power and how, in this process, the very nature of those that make up the public service, those that hold leadership positions, and those that have the time, resources and access to the Federal government – will be gendered and classed.

While WAVE celebrates the establishment of the Women's Economic Taskforce, the reality is that this is one group of women tasked to engage across a range of government policy areas. This together with the gendered nature of the public service necessarily means that women's and girls' voices and lived experience in the process *will be limited*.

Further, we also highlight that the intersectional experience of women will be necessarily limited as those barriers to access, while gendered, are further compounded for women without education, without access to travel, to time, to money, to language and to understand the culture and the preferred ways of work of a westernised democratic parliamentary structure.

Therefore we ask the Australian Government to:

- Publish a consultation approach and engagement methodology that is in keeping with the best practice principles of intersectional gender equity and, which centres the lived experience of those people that this White Paper process is seeking to ultimately support – the diverse Australian public
- Publish and advertise in a central accessible way the consultation opportunities and methodologies that the community and diverse stakeholders can engage in to contribute to this vital White Paper process (for example, in the same way as a Royal Commission)
- Enable stakeholders and partners of the Australian Government – including community organisations and peak not for profit organisations – to engage in the process of the White Paper by providing plain English and multi-language resources and tools to engage with the public on key matters. This would provide the opportunity for the Australian Government to build stronger relationships with community on the issue of employment and participation, to receive evidence based on the lived experience of the community, employers and employees. It would also have the benefit of raising awareness and educating the public on the key themes and issues of the White Paper, and its outcomes

## Ensure alignment and connection to the forthcoming National Strategy to Achieve Gender Equality

WAVE notes that the submission process for the White Paper's Terms of Reference asks the process to consider other processes and reviews currently underway relevant to the labour market.

Specifically the terms of reference state that:

10. The White Paper will consider other Government processes and reviews relevant to the labour market.

We highlight and advocate to the Australian Government the opportunity to align with the process about to commence to develop Australia's first National Strategy to Achieve Gender Equality.

Based on international practice and current evidence, WAVE, as part of the broader gender equity sector across Australia will be advocating that this Strategy includes processes, targets and outcomes with regard to:

- Addressing the gender segregated labour market – inclusive of equity and equality in male dominated trades and, equity in female dominated trades
- The foundational role of gender based budgeting to drive policy and practice across the Commonwealth Government and its expenditure which will impact programs and policy that deliver directly to improving workforce participation, industry development and skills and education

Harmonisation and alignment across these two strategies will be vital for a more productive economy, a more harmonious community, reduced violence in our community and, critically for this process, to address the challenges that we face in the Australian labour market.

## Response to Structure and Timing

Having made the above recommendations on consultation, we further argue that the timing and process of the consultation is expanded to ensure that all key stakeholders that use Australia's Vocational and Adult Education system are heard.

To reiterate the points above, we recommend that to maximise the use of the consultation process, the Federal Government works closely with a range of partners – not just those at the Jobs and Skills Summit – to maximise engagement and feedback on this crucial process.

In the case of skills, vocational education and training and adult education this would include providing opportunity for feedback from the following ensuring that the lived experience is centred and, that, intersectional and gendered barriers to participation and input are removed:

- State and Territory Governments
- Local governments
- Peak organisations
- Training Providers
- Students
- Employers
- Educators
- Community organisations – Neighbourhood houses, Migrant Settlement Services
- Adult Education Sector – ALA, ACED, Learn Local networks, Community Colleges, WEA and WAVE



## WAVE GLOSSARY OF TERMS

When we say...	What we mean is...	What we don't mean is...
Vocational and Adult Education	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 has 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.
The national vocational education & training system	<p>1) "The national training system is the Australian system for Vocational Education and Training (VET). It provides people with the work-ready skills and qualifications..." <a href="https://www.australianindustrystandards.org.au/national-vet-system/">https://www.australianindustrystandards.org.au/national-vet-system/</a></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". <a href="https://www.pc.gov.au/ongoing/report-on-government-services/2022/child-care-education-and-training/vocational-education-and-training">https://www.pc.gov.au/ongoing/report-on-government-services/2022/child-care-education-and-training/vocational-education-and-training</a></p>	
Technical Vocational Education & Training (TVET, VET)	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	

	<p>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)<sup>18</sup>.</p>	
<p>Gender Equity and Gender Equality</p>	<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-centered 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</p>	

<sup>18</sup> United Nations Educational, Scientific and Cultural Organization (UNESCO) (2016), *Strategy for Technical and Vocational Education and Training (TVET) (2016-2021)*. UNESCO  
<https://unesdoc.unesco.org/ark:/48223/pf0000245239>

United Nations Educational, Scientific and Cultural Organization (UNESCO) (2022), *Draft strategy for Technical and Vocational Education and Training (TVET) (2022-2029): transforming TVET for successful and just transitions*. 214/EX7. 4 March 2022  
<https://unesdoc.unesco.org/ark:/48223/pf0000380775?1=null&queryId=73debc60-ef03-4da9-9a8f-1b58b94508b7>

	<p>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. 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</p>	

	<p>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.</p> <p>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> <a href="https://handbook.ourwatch.org.au/leadership-resource/a-guide-to-help-you-work-out-how-gender-transformative-your-initiative-is">https://handbook.ourwatch.org.au/leadership-resource/a-guide-to-help-you-work-out-how-gender-transformative-your-initiative-is</a></p>	
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</i></p>	

	<p><i>work out how gender transformative your initiative is</i></p> <p><a href="https://handbook.ourwatch.org.au/leadership-resource/a-guide-to-help-you-work-out-how-gender-transformative-your-initiative-is">https://handbook.ourwatch.org.au/leadership-resource/a-guide-to-help-you-work-out-how-gender-transformative-your-initiative-is</a></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></p> <p><a href="https://handbook.ourwatch.org.au/leadership-resource/a-guide-to-help-you-work-out-how-gender-transformative-your-initiative-is">https://handbook.ourwatch.org.au/leadership-resource/a-guide-to-help-you-work-out-how-gender-transformative-your-initiative-is</a></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></p> <p><a href="https://handbook.ourwatch.org.au/leadership-resource/a-guide-to-help-you-work-out-how-gender-transformative-your-initiative-is">https://handbook.ourwatch.org.au/leadership-resource/a-guide-to-help-you-work-out-how-gender-transformative-your-initiative-is</a></p>	