

August 2024



NATIONAL SKILLS TAXONOMY DISCUSSION PAPER



A submission in response to Jobs and Skills Australia's
Discussion Paper on a National Skills Taxonomy

Women in Adult and Vocational Education (WAVE)

Response to Discussion Paper on National Skills Taxonomy

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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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 in all their diversity can participate fully in all aspects of work and democratic society, through equitable and transformative vocational and adult education.

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Introduction and executive summary

Women in Adult and Vocational Education (WAVE) presents this submission in response to the Australian Government's consultation on a National Skills Taxonomy (NST).

Our organisation approaches this proposal with significant reservations, questioning the necessity and potential impact of such a framework on Australia's education and skills system, along with its ability to create a 'common language' between VET and universities to support lifelong learning pathways.

WAVE's primary concern is that an NST, unless carefully designed and implemented, could inadvertently perpetuate or exacerbate existing inequities within the current vocational education and training system, including its skills frameworks. These inequities disproportionately affect women, marginalised communities, and individuals facing systemic and systematic disadvantage and discrimination based on intersecting forms of identity. We argue that broad inclusive definitions of 'skill' and 'competency' are a critical necessity. We argue further that any attempt to streamline workforce planning and reduce fragmentation in skills policy must be underpinned by an intersectional and gender-transformative approach.

Our submission highlights several potential risks associated with the implementation of an NST. These include the oversimplification of complex skill sets, the potential stifling of innovation in rapidly evolving sectors, and the creation of additional bureaucratic layers that could hinder rather than facilitate skill development and recognition. We are particularly concerned about the impact on sectors traditionally dominated by women, where work and associated skills are often undervalued, poorly recognised and poorly remunerated.

Despite these reservations, WAVE acknowledges that if the government proceeds with the development of an NST, it is crucial that the framework be designed with equity, inclusivity, and adaptability at its core. Our recommendations emphasise the need for flexible systems that can evolve with changing workforce needs, recognise diverse learning pathways, and actively work to dismantle structural barriers faced by women and marginalised groups.

We stress the importance of transparent and inclusive governance structures in the development and ongoing management of the NST. This includes ensuring diverse stakeholder engagement, with a particular focus on representing the voices of those most affected by potential changes to the skills system.

Furthermore, WAVE advocates for an approach that integrates the NST with broader policy initiatives aimed at improving Australia's education, training, and migration systems. We emphasise the need for strategies that address gender imbalances in high-need occupations, promote equitable resource allocation, and create supportive ecosystems for skilled migrants, particularly women facing intersecting forms of discrimination.

In conclusion, while WAVE questions the fundamental need for a National Skills Taxonomy, we urge that if such a framework is to be developed, it must prioritise equity, inclusivity, and responsiveness to the diverse needs of all Australians with a focus on women, intersectional groups and those traditionally marginalised. The NST should be transformational, that is a tool for dismantling existing barriers and creating more accessible pathways for skill development and recognition, rather than reinforcing current systemic inequities.

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The detailed recommendations that follow in our submission provide specific strategies for achieving these goals, ensuring that any implemented NST serves to create a more equitable and inclusive skills system for all.

A NOTE ON TRANSFORMATIVE PRACTICE

Gender transformative approaches address the root causes of gender inequality, rather than just its symptoms. These approaches aim to:

- Reshape unequal power dynamics
- Transform harmful gender norms
- Achieve lasting change and gender equity
- Redistribute resources, expectations, and responsibilities among women, men, and non-binary individuals
- Remove structural barriers
- Empower disadvantaged populations

According to the United Nations Population Fund (UNFPA), gender transformative approaches involve:

- Integrating gender equality perspectives into all interventions
- Promoting critical reflection on rigid gender norms and power dynamics
- Strengthening gender equality in policies, strategies, and activities
- Empowering marginalized groups to claim their rights
- Engaging men and boys as allies in achieving gender equality

UNICEF defines gender transformative programming as "Approaches that address the causes of gender-based inequalities and work to transform harmful gender roles, norms and power imbalances. The aim is to achieve positive development outcomes and gender equity by transforming unequal gender relations."

Key principles for implementing these approaches include:

- Integration across different activities and sectors
- Addressing social and gender norms at individual, community, and societal levels
- Engaging multiple stakeholders, including men and boys
- Strengthening services and systems to support gender equality
- Advocating for policy and legal reforms to change broader structures

Why is this important for the NST and Skills System?

Skills Policy

By adopting these gender transformative principles and approaches, Australia's National Taxonomy of Skills Policy can drive meaningful, lasting change in gender relations and equity within the skills system. Specifically:

- The policy can integrate gender equality perspectives across all skill classifications and descriptions.
- It can promote critical reflection on how current skill definitions and valuations may reflect or reinforce gender biases.
- The taxonomy can be designed to strengthen gender equality in workforce development strategies and activities.

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- It can empower marginalised groups and individuals facing multiple forms of disadvantage, by ensuring their skills and experiences are adequately recognised and valued.
- The policy can engage diverse stakeholders, including men and boys, in redefining and valuing skills across various sectors.

Implementing these approaches in the National Taxonomy of Skills Policy would underpin and drive an equitable skills system by:

- Recognising and valuing skills traditionally associated with feminised work
- Addressing unconscious biases in skill definitions and classifications
- Encouraging equal participation across all skill areas regardless of gender
- Promoting equal career progression opportunities
- Facilitating fair remuneration based on skill rather than gender-based valuations

By embedding gender transformative approaches in the foundation of the skills taxonomy, Australia can create a more inclusive, equitable, and effective skills ecosystem that benefits all members of society.

Recommendations in Full

Noting WAVE's resistance to the establishment for an NST, if the project does continue, our submission recommends that the Australian Government:

1. *Prioritise an Intersectional and Gender-Transformative Approach in the National Skills Taxonomy*

WAVE recommends that the development of a National Skills Taxonomy (NST) be grounded in an intersectional and gender-transformative framework. That is to say, the underpinning policy and framework needs to consider how different parts of a person's identity combined to affect their experiences and, aim to promote equality. This approach should ensure that the taxonomy actively dismantles existing gendered and intersectional inequities rather than perpetuating them. The NST should:

- **Equitably value skills across all sectors**, particularly addressing undervalued and poorly recognised skills in female-dominated and marginalised communities, such as caregiving, interpersonal communication, and community engagement.¹
- **Integrate a gender lens** into every stage of the taxonomy's development and implementation, ensuring that those that face intersectional disadvantage are not further penalised by the taxonomy's structure or application.

¹ Here WAVE refers to evidence that shows that employers often undervalue foreign qualifications and experiences due to differences in training systems and unfamiliarity with credentials from other countries. This undervaluation frequently results in marginalized job seekers being underemployed and experiencing lower job satisfaction. Further we note evidence of marginalized job seekers are often overqualified for the positions they end up in, contributing to reduced job satisfaction and well-being and the ongoing evidence of bias in employment processes that does lead to discrimination against marginalised candidates. (Anti Discrimination NSW, 2023)

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- **Promote equity and inclusion** by actively addressing the unique challenges faced by underrepresented and marginalised groups, ensuring that the taxonomy supports transformative change leading to more equitable distribution of opportunities and resources.

2. Ensure Flexibility, Adaptability, and Responsiveness in the Skills System

WAVE urges that the NST be designed with flexibility and adaptability at its core to ensure that it can evolve with the changing needs of the workforce and economy. The taxonomy should:

- **Facilitate the recognition of emerging skills** in rapidly evolving sectors such as digital technology, green energy, and health innovation – and those that we are yet to recognise. For WAVE recognition of emerging skills will only be successful if it does this proactively, ensuring equity throughout.
- **Support lifelong learning** by accommodating various learning pathways, including formal education, work experience, and short courses along with community based learning. The NST should enable individuals to continuously learn, develop and adapt their knowledge and skills throughout their careers.
- **Encourage innovative approaches to learning and assessment** that move beyond traditional competency-based models, supporting broader capabilities and application contexts as well as evolving ways of learning.

3. Address Regional and Sectoral Nuances in the Taxonomy

WAVE recommends that the NST be developed in a way that recognises and accommodates the diverse needs of Australia's regions and sectors. This can be achieved by:

- **Ensuring that the taxonomy is not overly centralised** and allows for regional and sectoral variations in skill needs, skill recognition and development, particularly in areas where industry needs, community needs and cultural practices differ significantly.
- **Supporting industry-specific and jurisdictional adaptations** of the NST, ensuring that the framework remains relevant and effective in addressing local labour market demands.

4. Enhance Transparency, Accountability, and Participatory Governance

To ensure the effectiveness and inclusivity of the NST, WAVE recommends the following measures:

- **Implement transparent and inclusive governance structures** that involve diverse stakeholder voices, particularly those from marginalised groups. This participatory approach should be central to decision-making processes.
- **Establish mechanisms for regular review and updates** to the NST, ensuring that it remains responsive to changing societal needs and workforce dynamics. These reviews should be informed by ongoing dialogue with communities most affected by the taxonomy.

With regard to governance we offer specific set of recommendations below.

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5. Promote Equity and Inclusion Through the Recognition of Diverse Learning Experiences

WAVE advocates for a skills taxonomy that recognises and values the diverse ways in which individuals acquire and apply skills. To achieve this, the NST should:

- **Improve recognition of prior learning (RPL) and work experience**, ensuring that all forms of learning are valued and integrated into the skills system. This should promote flexibility and inclusivity as a standard approach.
- **Facilitate the creation of short-form qualifications** and micro-credentials that recognise specific skills and experiences, providing individuals with accessible pathways for skill development and career advancement.

6. Address Gender Imbalances and Promote Inclusivity in High-Need Occupations

WAVE recommends targeted initiatives to address gender imbalances in occupations experiencing skills shortages, particularly in traditionally gendered fields. The NST should:

- **Incorporate specific strategies to reduce gender segregation** in education and training pathways, particularly in STEM fields and traditionally male-dominated trades and economic sectors.
- **Monitor and evaluate the effectiveness of programs** such as the Women in STEM Cadetships and Advanced Apprenticeships Program, ensuring that these initiatives effectively promote gender equity.
- **Support cultural and perception shifts** that encourage greater participation of women and marginalised groups in high-need and high-growth sectors.

7. Support the Integration of Education, Training, and Migration Systems

WAVE recommends that the NST be developed as part of a broader strategy that integrates Australia's education, training, and migration systems to create a cohesive and responsive skills ecosystem. The NST should:

- **Align with the Australian Qualifications Framework** to ensure consistency across the VET and higher education sectors, facilitating accessible learning pathways and smooth transitions for learners.
- **Address and facilitate the work to break down barriers to marginalised workers in our community** particularly those workers from overseas who because of embedded and discriminatory systems in our skills system.

8. Implement a Comprehensive and Inclusive Implementation Plan

Finally, WAVE emphasises the need for a detailed and inclusive implementation plan for the NST that includes:

- **Clear timelines for the development, testing, and full implementation** of the NST, with a focus on ensuring that the framework is operational by 2025.
- **Development of a robust Theory of Change and Monitoring and Evaluation indicators so that success is measurable.**

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- **Pilot programs and iterative development** of qualification models, allowing for continuous refinement based on stakeholder feedback and evolving industry needs.
- **Alignment with other sector reforms**, ensuring that the NST is integrated with broader policy initiatives aimed at improving Australia's education and workforce systems.

Specific Recommendations on an NST for Equitable Skills Migration

9. *Adopt an Inclusive and Broad Definition of Skill*

It is particularly important for women facing compounding forms of discrimination that NST should move beyond traditional occupational classifications to adopt a broad and inclusive definition of skill. This definition should:

- **Recognise qualifications, experience, and competencies gained in non-Western countries**, ensuring that migrant women's skills are fully valued within the Australian labour market.
- **Include informal and non-traditional learning pathways**, acknowledging the diverse ways in which skills are acquired, particularly by women in caregiving roles or community leadership positions.

10. *Integrate a Gender-Sensitive and Intersectional Framework*

The NST must be developed with a gender-sensitive and intersectional framework that explicitly addresses the unique challenges faced by migrant women. This intersectional framework should:

- **Actively counteract gendered biases** in skill recognition and migration policies, ensuring that the taxonomy promotes equity and inclusion for all workers, regardless of intersecting barriers including gender, ethnicity, or migration status.
- **Incorporate specific measures to address the compounded discrimination** that migrant women face, particularly those from non-English speaking backgrounds or racial minorities.

11. *Establish Pathways for Skills Recognition for Vulnerable Migrants*

To support vulnerable migrants, including those at risk of family violence, the NST should:

- **Create accessible pathways for skills recognition** that cater to women on temporary visas, ensuring that these pathways do not expose them to additional compounding forms of discrimination and disadvantage.
- **Provide tailored support for migrant women facing barriers**, such as language assistance or guidance on navigating the Australian skills recognition process.
- Ensure that programs and interventions **do not compound risks of causing unintended harm**

12. *Ensure Regular and Inclusive Updates to the NST*

The NST should include mechanisms for regular updates to remain responsive to the evolving needs of the workforce. To achieve this, the review should recommend:

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- **Ongoing dialogue with migrant communities, women’s organizations, and other stakeholders**, ensuring that the NST reflects the lived experiences and needs of migrant women.
- **Continuous monitoring and adaptation** of the taxonomy to incorporate emerging skills and changing labour market demands, with particular attention to the impact on intersectional and marginalised groups.

13. Prioritise Equitable Resource Allocation and Access

The NST’s implementation should focus on equitable resource allocation, ensuring that migrant women have access to the necessary tools and opportunities to thrive. The review should:

- **Advocate for targeted training programs and support systems** specifically designed for migrant women, addressing the barriers they face in accessing the labour market.
- **Remove systemic barriers to participation**, such as the non-recognition of overseas qualifications or lack of access to relevant training, ensuring that all individuals, regardless of background, can fully utilize their skills.

14. Develop a Supportive Ecosystem for Skilled Migrant Women

The review should recommend the development of a supportive ecosystem that addresses the broader needs of skilled migrant women within the NST framework. This includes:

- **Collaboration with agencies focused on migrant support and gender equity**, ensuring that the NST aligns with broader initiatives to support migrant women’s integration into the workforce.
- **Providing comprehensive information and resources** to migrant women, helping them understand and navigate the NST and the broader Australian skills system.

Recommendations on Governance for the National Skills Taxonomy

15. Establish an Independent Governing Agency

WAVE recommends that the National Skills Taxonomy (NST) be overseen by an independent governing agency. This agency should operate autonomously from government departments and industry bodies to ensure impartiality and prevent conflicts of interest. The agency’s independence is critical to maintaining the integrity of the NST and ensuring that it serves the broad public interest rather than the specific agendas of stakeholders.

16. Ensure Diverse and Inclusive Stakeholder Engagement

The governance of the NST must prioritise diverse and inclusive stakeholder engagement, with a particular focus on representing women and people/communities facing compounding forms of disadvantage. WAVE recommends that the independent governing agency actively include voices from these communities in decision-making processes. This approach will ensure that the NST reflects a wide range of experiences and needs, evolving in response to feedback from those most affected by its implementation.

17. Implement Transparent and Accountable Governance Structures

To foster trust and legitimacy, the governance of the NST should be built on transparency and accountability. WAVE recommends that the independent governing agency implement clear

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and accessible decision-making processes, stakeholder representation, with regular public reporting and independent audits. A formal grievance and appeals process should also be established to address concerns and ensure ongoing accountability.

18. Commit to Continuous Updating and Adaptation

Given the rapidly changing nature of the workforce and the emergence of new technologies and industries, WAVE recommends that the NST include mechanisms for continuous monitoring and evaluation, updating and adaptation. The independent governing agency should be responsible for regularly reviewing and updating the taxonomy, incorporating feedback from diverse stakeholders, and ensuring that the NST remains relevant and responsive to the evolving needs of the workforce.

19. Promote Equitable Resource Allocation and Access

WAVE emphasises the importance of equitable resource allocation in the implementation of the NST. The independent governing agency should ensure that resources are allocated in a way that addresses the specific needs of women, and those facing intersecting forms of disadvantage, and underrepresented sectors. This includes providing targeted training programs, resources, and support systems to remove barriers to access and participation, ensuring that all individuals can develop and apply their skills.

Current policy context and drivers

The establishment of a National Skills Taxonomy (NST) in Australia is being driven by a confluence of policy initiatives and recommendations from key governmental and advisory bodies. These efforts are aimed at reforming and modernising Australia's vocational education and training (VET) qualifications system to better align with the evolving needs of the workforce, industry, and learners. WAVE acknowledges the critical policy settings and implications surrounding these efforts while advocating for a nuanced, intersectional approach that ensures equity and inclusivity in the design and implementation of any national framework.

The policy context for developing a National Skills Taxonomy is informed by a series of reports and recommendations, most notably from the Qualification Reform Design Group (QRDG), Jobs and Skills Australia (JSA), and the Australian Universities Accord. These bodies have outlined the need for a more integrated, flexible, and responsive skills system that addresses current and future challenges in Australia's labour market.

The Need for Differentiation and Flexibility in Qualifications

The QRDG's report, "Unlocking the Potential of VET," highlights the inadequacies of a one-size-fits-all approach to VET qualifications, advocating for a differentiated system that caters to the specific needs of various industries and learners. The QRDG proposes three types of qualifications: those leading to specific occupations, those preparing learners for multiple occupations within an industry, and those developing cross-sectoral or foundation skills.

This differentiation aligns with theories of skill categorization, which emphasise the need to classify skills based on their application and context rather than treating them as homogenous. The report's emphasis on flexibility and reducing overspecification reflects a broader recognition that skills must be transferable across sectors to support a dynamic and adaptable workforce. The focus on broader capabilities rather than narrowly defined competencies marks a shift towards competency-based education models that prioritise holistic outcomes and applications of learning, which are essential for navigating the complexities of the modern labour market.

Focus on Industry and Learner Needs

The QRDG's recommendations underscore the importance of aligning qualifications with industry needs while also considering learners' aspirations. By ensuring that qualifications are designed to support adaptable and transferable skills, the policy aims to enhance employability and facilitate transitions between different job roles and industries. This approach is consistent with modern skill taxonomies that advocate for the development of meta-skills, such as critical thinking and problem-solving, which are applicable across multiple domains.

Moreover, the QRDG's emphasis on integrating foundation skills—such as literacy, numeracy, and digital literacy—into the qualifications system highlights the foundational nature of these skills in supporting specialised skill development. This holistic and integrated approach aligns with the principles of a comprehensive skills taxonomy that recognises the interconnectedness of different skills and knowledge areas.

Enhancing Learning and Assessment

The QRDG's call for innovative approaches to learning and assessment, moving beyond traditional competency-based models, is a critical element of the proposed reforms. By focusing on broader learning outcomes and application contexts, the new qualifications system aims to support a more nuanced understanding of skills and competencies. This perspective aligns with contemporary theories that emphasise the importance of broader capabilities in education, particularly in preparing individuals for the diverse and evolving demands of the workforce.

The role of Jobs and Skills Councils (JSCs) in driving these reforms is crucial, as they are tasked with aligning qualifications with industry needs and ensuring that training products meet high-quality standards. The involvement of JSCs in the development of new qualification models is intended to create a more responsive and industry-relevant VET system, which is essential for supporting the ongoing development of a national skills taxonomy.

Lifelong Learning and Equity

Both the QRDG and the JSA emphasise the importance of lifelong learning in their recommendations. Lifelong learning systems are seen as essential for enabling individuals to continuously update their skills and knowledge in response to changing economic conditions and job market demands. The QRDG's focus on lifelong learning is particularly relevant in the context of a national skills taxonomy, as it underscores the need for a flexible and adaptable framework that supports ongoing skill development throughout an individual's career.

The JSA's "2023 Annual Jobs and Skills Report" also highlights the need for a systematic approach to building foundational skills, progressing to advanced knowledge and workforce skills at the highest levels. This approach necessitates the integration of Australia's education, training, and migration systems to work in concert, responding flexibly to the evolving needs of the labour market.

The report further stresses the importance of equity and inclusion in the national skills system, recognising that current labour market conditions are not experienced equally across different cohorts and regions. For instance, First Nations people, young people from low socio-economic backgrounds, and women continue to face significant barriers in education and employment. The roadmap outlined by the JSA calls for enhanced opportunities for these underrepresented groups, emphasizing the need for a more inclusive skills system that addresses the specific challenges they face.

Development of a National Skills Taxonomy

The JSA's roadmap articulates the need for a shared National Skills Taxonomy, developed through consultation with industry. This taxonomy is envisioned as a tool for providing a common language for stakeholders to identify and articulate skills consistently. It aims to facilitate the creation of short-form qualifications and the identification of generic and high-level skills across various qualifications.

The Australian Universities Accord Final Report echoes this sentiment, advocating for the development of a National Skills Taxonomy as a key initiative for creating a more equitable, responsive, and dynamic skills system in Australia. The report emphasises the need for a

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systematic approach to skill development, extending from foundational skills to advanced workforce skills, and underscores the importance of an interconnected systems view that integrates education, training, and migration systems.

The proposed National Skills Passport, as outlined in the Universities Accord, is a critical component of this taxonomy. The passport is designed to document individuals' skills, qualifications, and experiences, making them visible to potential employers and supporting better matching between skills and job opportunities. This initiative, along with the taxonomy, is intended to enhance transparency and accessibility in the skills system, ensuring that all Australians have opportunities to present their capabilities and pursue meaningful employment.

Addressing Gender and Intersectional Barriers

The Universities Accord and the JSA's roadmap both recognise the persistent gender imbalances and intersectional barriers within the national skills system. For example, significant gender disparities exist in occupations experiencing shortages, such as early childhood education and carpentry. The reports highlight the need for a deeper understanding of the barriers leading to gendered outcomes, including cultural norms, perceptions, and access issues.

Monitoring and evaluating initiatives like the Women in STEM Cadetships and Advanced Apprenticeships Program is crucial to assessing their effectiveness in promoting gender equity. The development of a National Skills Taxonomy must therefore be informed by a sound theory of change, a commitment to addressing these barriers, ensuring that the taxonomy supports a more equitable distribution of opportunities and resources across genders and other intersectional and marginalised groups.

Implementation and Future Directions

The QRDG and JSA provide detailed implementation plans for the new qualifications system, with full implementation expected by 2025. These plans include the development and refinement of new qualification models, alignment with other sector reforms, and the integration of foundational skills into the qualifications system.

The Universities Accord Final Report further outlines strategic objectives for the national skills system, including minimizing unemployment and underemployment, increasing productivity and real wages, and reducing disadvantage. These objectives will require a collaborative approach across all sectors, including education, training, and migration, and the development of a comprehensive national skills roadmap.

The development of a National Skills Taxonomy, as envisioned by these reports, represents a significant shift towards a more integrated and cohesive skills system in Australia. However, WAVE emphasises that this shift must be accompanied by a strong focus on equity, inclusivity, and intersectionality to ensure that the taxonomy truly supports the diverse needs of Australia's workforce.

Lessons from Existing Taxonomies

Key Benefits and Limitations:

Existing skills taxonomies have been utilised across various sectors to standardize and organize skills, enabling better communication between stakeholders and improving workforce planning. However, these taxonomies carry significant limitations, particularly when they fail to adequately account for gender and intersectional inequities. These limitations must be critically examined before any new taxonomy is considered.

Over-Simplification of Complex Skills Ecosystems

Rationale for NST from Discussion Paper: A National Skills Taxonomy can simplify the organization of skills, making it easier to standardize and streamline workforce planning.

WAVE Response: National skills taxonomies, by their very nature, often oversimplify the diversity and complexity of skills required across various sectors. By imposing a standardized framework, there's a significant risk of neglecting unique regional, sectoral, or cultural nuances that are vital for certain industries or communities. This one-size-fits-all approach fails to capture the dynamic and evolving nature of skill needs, particularly in sectors where change is rapid and multifaceted. For example, the skills required in remote Indigenous communities or in female-dominated sectors like caregiving or social services are deeply embedded in cultural and relational contexts, which a standardized taxonomy is unlikely to reflect accurately.

Moreover, the research by Wheelahan and Moodie (2013) highlights the dangers of reducing complex skills into narrow categories that do not reflect the realities of different industries and occupations. This oversimplification can lead to the devaluation of critical skills that do not neatly fit into predefined categories, ultimately undermining the goal of creating a more skilled and adaptable workforce.

Reinforcement of Gender and Intersectional Biases

Rationale for NST from Discussion Paper: A National Skills Taxonomy can help address inequities by providing a clear and consistent framework for skills recognition and development.

WAVE Response: Contrary to this assertion, a National Skills Taxonomy can perpetuate and even institutionalize existing gendered biases and other forms of inequity. If the taxonomy undervalues skills traditionally associated with women—such as caregiving, interpersonal communication, or community engagement—these biases become entrenched within the national framework. This institutionalization reinforces wage disparities and limits opportunities for those in gendered roles, particularly in sectors that are already undervalued.

The feminist critique of vocational education and training (VET), as discussed by Butler and Ferrier (2000), emphasises how formalised systems often reinforce gendered divisions of labour. By failing to recognise and validate informal or non-traditional skills that are vital in marginalised communities, a national taxonomy risks excluding the very people it is supposed to serve. This perpetuation of inequity is particularly concerning when considering the

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compounded disadvantages faced by women of colour, disabled women, and LGBTQ+ individuals, whose skills and contributions are often marginalised within formal frameworks.

The work of Gotian and Andersen (2020) further illustrates how success metrics, which emphasise traditionally "masculine" traits like boldness and technical expertise, can disadvantage women who prioritise collaborative and relational skills. An NST that does not actively challenge these biases risks institutionalizing them, further entrenching gender disparities in professional advancement.

Inequitable Resource Allocation

Rationale for NST from Discussion Paper: A National Skills Taxonomy can ensure more equitable resource allocation by providing a unified framework for identifying and supporting skill development needs.

WAVE Response: The failure of national frameworks to recognise and adequately support the specific needs of women and marginalised groups exacerbates inequities in resource allocation. This misalignment results in a skewed distribution of resources that disproportionately benefits male-dominated sectors and higher-status occupations while neglecting those sectors where women and marginalised communities are overrepresented. As a result, women in lower-paying, lower-status occupations—such as caregiving, retail, and hospitality—receive inadequate support for skill development and career progression, perpetuating cycles of poverty and inequality.

Research by Butler and Ferrier (2000) underscores this issue, highlighting how VET systems often fail to provide equitable access to resources for women and marginalised groups. Their study found that women are frequently funnelled into lower-paying, traditionally "feminine" occupations through VET programs, with limited opportunities for advancement into higher-paying fields. This inequitable resource allocation not only limits women's economic opportunities but also reinforces the gendered division of labour within the workforce.

Retention or Addressing Features

To create a truly effective and equitable skills taxonomy, it is essential to incorporate the following features:

Inclusive and Comprehensive Skill Recognition

The NST must recognise and appropriately value a wide range of skills, particularly those that are often overlooked or undervalued in traditional frameworks. This includes relational, caregiving, and community engagement skills, which are critical for societal well-being and must be valued equally alongside technical skills. The recognition of these skills is not merely a matter of fairness; it is essential for creating a workforce that reflects the diverse contributions of all its members.

In this context, the research by Gotian and Andersen (2020) is particularly instructive. Their findings highlight the importance of recognising a diverse range of skills to avoid perpetuating gender biases. A truly inclusive skills taxonomy must go beyond traditional categorizations and actively seek to elevate the skills that are vital in female-dominated and marginalised sectors.

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Intersectional Framework and Gender-Transformative Lens

The NST must be explicitly designed using an intersectional framework that acknowledges and addresses the compounded disadvantages faced by women, people of colour, disabled individuals, LGBTQ+ communities, and other intersectional and marginalised groups. This requires a shift from merely adding marginalised voices to the conversation to actively restructuring the framework to dismantle systemic biases.

An intersectional approach recognises that individuals experience multiple forms of discrimination simultaneously, which can exacerbate their marginalization within the workforce. For example, a woman of colour in a caregiving role may face discrimination based on her gender, race, and occupation, all of which intersect to limit her opportunities for advancement. A gender-transformative lens goes further, seeking to actively disrupt and transform the power structures that perpetuate these inequities. This approach requires not only the inclusion of marginalised voices but also the restructuring of the skills taxonomy to prioritise equity and justice.

Regular Review and Accountability

WAVE recommends that National Skills Taxonomy (NST) must be fundamentally grounded in a robust theory of change and a comprehensive monitoring and evaluation (M&E) framework. These elements should not be mere afterthoughts but central, guiding principles that shape the development, implementation, and evolution of the taxonomy. The Theory of Change should comprise:

- Clearly define the long-term goals of the taxonomy, including its role in promoting equity and inclusion in the workforce.
- Identify the specific pathways through which the NST will contribute to these goals.
- Outline the assumptions underlying these pathways and how they will be tested.
- Incorporate gender-transformative and intersectional perspectives to ensure the taxonomy addresses systemic inequalities.

Given that the monitoring and evaluation framework should then:
a rigorous M&E framework should be established to:

- a. Set clear, measurable indicators for assessing the NST's progress towards its equity and inclusion goals.
- b. Establish regular data collection and analysis processes to track these indicators.
- c. Incorporate both quantitative and qualitative measures to capture the full impact of the NST.
- d. Ensure that the voices of those most affected by the taxonomy—particularly women and marginalized groups—are central to the evaluation process.

The NST must include mechanisms for regular review and updates to identify and eliminate biases. This process should be transparent, inclusive, and accountable to ensure that the taxonomy evolves in response to changing societal needs and workforce dynamics. A gender-

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transformative approach requires that the voices of those most affected by the taxonomy—women and marginalised groups—are central to these reviews.

This regular review process must also include accountability measures to ensure that the NST is meeting its equity and inclusion goals. This could include the establishment of an independent oversight body tasked with monitoring the implementation of the NST and making recommendations for improvements. Additionally, the review process should be participatory, with input from a diverse range of stakeholders, including representatives from marginalised communities, to ensure that the NST remains responsive to the needs of all workers.

How a future NST can be used for equity

Value Addition and Challenges:

WAVE acknowledges that an NST could potentially streamline workforce planning and reduce fragmentation in skills policy. However, there are significant challenges and potential unintended consequences that must be considered. These challenges are particularly acute when viewed through an intersectional and gender-transformative lens.

Stifling Innovation and Adaptability

Rationale for NST from Discussion Paper: A National Skills Taxonomy can provide a stable framework that supports consistent skills development across sectors, thereby fostering innovation and adaptability.

WAVE Response: In reality, rigid taxonomies can stifle innovation by enforcing a static understanding of skills. These frameworks may not keep pace with technological advancements or shifts in the global economy, hindering industries' ability to adapt to new challenges or seize emerging opportunities. The inflexibility inherent in a standardized taxonomy can prevent the recognition of new and innovative combinations of skills that do not fit neatly into existing categories.

Gotian and Andersen (2020) illustrate how narrowly defined success metrics in male-dominated fields can exclude the contributions of those who prioritise collaborative and relational skills. Similarly, a rigid NST could fail to accommodate the emerging skills that are critical in rapidly evolving sectors such as digital technology, green energy, or health innovation. The result is a workforce development strategy that is less capable of responding to future demands, potentially leaving Australia at a competitive disadvantage on the global stage.

Perpetuation of Gender and Intersectional Inequities

Rationale for NST from Discussion Paper: A National Skills Taxonomy can help address inequities by providing a clear and consistent framework for skills recognition and development.

WAVE Response: An NST that does not explicitly address gender and intersectional biases risks perpetuating existing inequities. If the taxonomy prioritises skills and traits predominantly held by men—such as boldness, confidence, and technical expertise—it could further marginalise women and individuals from minority groups. The research by Gotian and Andersen (2020) underscores this risk, showing how success metrics that emphasise traditionally "masculine" traits can disadvantage women and those who prioritise collaborative and relational skills. Without careful design, an NST could institutionalize these biases, reinforcing the very disparities it seeks to address.

Moreover, an NST that fails to account for intersectional identities—such as the experiences of women of colour, disabled women, and LGBTQ+ individuals—risks further entrenching their marginalization within the workforce. For example, if the NST does not recognise the unique challenges faced by these groups, it may fail to provide the necessary support for their skill development and career advancement. This could result in a workforce that is even more stratified along lines of gender, race, and class, with those at the intersections of multiple forms of discrimination being left behind.

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Widening of Regional and Sectoral Disparities

Rationale for NST from Discussion Paper: A National Skills Taxonomy can help reduce regional disparities by providing a consistent framework for skills development across all regions.

WAVE Response: In practice, a national framework might fail to account for regional differences in industry needs, cultural practices, or economic conditions. This can lead to a misallocation of resources, where training programs and educational initiatives are standardized in ways that do not benefit—or may even harm—certain regions. Such disparities could widen the gap between urban and rural areas or between different states and territories, leading to uneven economic development.

Saskia Sassen's (2001) work on global cities and regional economic development highlights how national policies can exacerbate regional inequalities by failing to account for local contexts. A standardized NST risks overlooking the unique needs of Australia's diverse regions, leading to a skills system that is disconnected from the realities of local labour markets. This misalignment could result in a workforce that is concentrated in urban centers while leaving rural and remote communities underserved and economically marginalised.

Innovation Stagnation

Rationale for NST from Discussion Paper: A National Skills Taxonomy can foster innovation by providing a structured and consistent framework for skill development across sectors.

WAVE Response: A rigid NST could stifle innovation by enforcing static skill definitions that do not evolve with technological advancements or changing economic conditions. This is particularly concerning in emerging industries where women and marginalised groups are often underrepresented. A dynamic and adaptable taxonomy is crucial to ensure that these groups can access new opportunities and contribute to innovation.

For instance, the rapid growth of the digital economy and the rise of new technologies such as artificial intelligence, blockchain, and renewable energy require a workforce with a diverse and evolving skill set. Women and marginalised groups have historically been underrepresented in these fields, and a rigid NST could further limit their access to these opportunities. To avoid this, the NST must be designed to recognise and support the development of new and emerging skills, ensuring that all workers can participate in and benefit from the innovation economy.

Overarching Vision and Guiding Principles:

The NST should be guided by a vision of equity, inclusivity, and transformation across all sectors of the workforce. The guiding principles should include:

Equity, Inclusion, and Transformation

The NST must be rooted in equity and inclusion, with a specific focus on gender-transformative practices. This requires actively dismantling barriers that perpetuate gender and intersectional inequities and creating pathways that elevate the skills and contributions of marginalised groups. The NST should aim to transform the power structures that currently dictate whose

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skills are valued and whose are not, ensuring that all workers have the opportunity to contribute meaningfully to the workforce.

This principle aligns with the findings of McGrath and Yamada (2023), who argue for a more inclusive and equitable approach to vocational education and training (VET) that recognises the diverse contributions of all workers. They emphasise the importance of moving beyond traditional skills frameworks that reinforce existing inequalities and instead embracing a more holistic and transformative approach that values all forms of work.

Flexibility, Adaptability, and Responsiveness

The taxonomy should be flexible and adaptable, capable of evolving with the workforce's changing needs. This includes recognising emerging skills and ensuring that the taxonomy remains relevant and responsive to the diverse needs of all workers, particularly those in underrepresented sectors. A flexible NST will allow for the recognition of new and innovative skills, ensuring that the workforce is prepared for the challenges of the future.

This approach is supported by the work of Wheelahan and Moodie (2013), who argue for a shift from competencies to capabilities in vocational education and training. They emphasise the need for a more dynamic and adaptable framework that recognises the full range of skills and capabilities required in a rapidly changing world. By adopting a capabilities approach, the NST can better support workers in developing the skills they need to thrive in the 21st century.

Transparency, Accountability, and Participatory Governance

The development and implementation of the NST should be transparent and inclusive, based on a strong theory of change and guided by an equally strong monitoring and evaluation framework. Governance structures must ensure that the voices of women, marginalised groups, and communities at the intersections of multiple forms of discrimination are central to decision-making processes. A participatory approach is essential for creating a taxonomy that is truly reflective of the diverse Australian workforce.

This principle is echoed in the recommendations of the Qualification Reform Design Group (2024), which calls for greater transparency and accountability in the governance of vocational education and training systems. They highlight the importance of involving a diverse range of stakeholders in decision-making processes to ensure that the needs of all workers are adequately represented. By adopting a participatory governance model, the NST can create a more inclusive and equitable skills system.

Addressing Barriers for Skilled Migrant Women Through the National Skills Taxonomy

Skilled migration plays a critical role in Australia's workforce development, yet it often fails to account for the unique barriers faced by migrant women. These barriers include systemic discrimination, underemployment, challenges in recognising overseas qualifications, and additional vulnerabilities such as family violence. A well-designed National Skills Taxonomy (NST) can help address these issues, ensuring that the skills and contributions of migrant women are fully recognised and valued within the Australian labour market.

The following points and advice are based on submissions and advocacy undertaken by WAVE to the Australian Government for the consultation for *A Migration System for Australia's Future*.²

Barriers Faced by Skilled Migrant Women

Migrant women often encounter significant challenges in the Australian workforce, including:

1. **Systemic Discrimination in Skill Recognition:** The definition of "skill" in migration policies has traditionally been narrow and occupationally focused, often undervaluing skills gained in non-Western countries. This leads to underemployment or unemployment among skilled migrant women whose qualifications and experience are not recognised or valued in the Australian labour market.
2. **Gendered Biases in Migration Policies:** Australia's skilled migration system frequently disadvantages women through policies that prioritise male-dominated professions and sectors. This is exacerbated by the categorisation of migrants into primary and secondary applicants, where secondary applicants (often women) are overlooked despite possessing significant skills and experience. Research indicates that these policies reinforce gendered roles and contribute to the underutilization of skilled female migrants.
3. **Vulnerability to Family Violence:** Many migrant women face additional risks of family violence, with their migration status being used as a tool for control by perpetrators. Women on temporary visas often have limited access to support services and face significant barriers when attempting to leave abusive relationships, including the fear of deportation and the stigma of returning to their home countries after relationship breakdowns.
4. **Intersectional Barriers:** Migrant women, particularly those from non-English speaking backgrounds or racial minorities, often face intersectional discrimination based on both gender and ethnicity. These intersectional barriers further limit their access to opportunities and contribute to the undervaluation of their skills in the Australian workforce.

² <https://wave.org.au/wave-calls-for-future-migration-strategy-to-be-gender-equal/>

Designing an Inclusive National Skills Taxonomy

To address these barriers, the National Skills Taxonomy must be designed with a focus on equity, inclusivity, and responsiveness to the specific challenges faced by skilled migrant women. WAVE recommends the following key design principles for the NST:

1. **Inclusive and Broad Definitions of Skill:** The NST should adopt a broad and inclusive definition of skill that recognises qualifications, experience, and competencies gained in non-Western countries. This approach should move beyond traditional occupational classifications to value diverse forms of knowledge and expertise, including those typically held by women, such as caregiving and community engagement skills.
2. **Recognition of Non-Traditional and Informal Learning:** The taxonomy should incorporate mechanisms for recognising informal and non-traditional learning, particularly for migrant women who may have gained significant skills outside formal education systems. This would help to ensure that all skills, regardless of where or how they were acquired, are valued and contribute to workforce participation.
3. **Gender-Sensitive and Intersectional Framework:** A gender-sensitive and intersectional framework should be integral to the NST, ensuring that the taxonomy actively addresses and counteracts the gendered biases present in current migration and employment policies. This includes explicitly recognising and addressing the barriers faced by migrant women and other intersectional and marginalised groups in accessing and participating in the workforce.
4. **Support for Vulnerable Migrants:** The NST should be designed to include support mechanisms for vulnerable migrants, including those at risk of family violence. This could involve creating pathways for skills recognition that are accessible to women on temporary visas and ensuring that these pathways do not expose them to additional risks or exploitation and, all policies should ensure that they “do no harm”.
5. **Regular and Inclusive Updates:** The NST must be regularly updated to remain relevant and responsive to the evolving needs of the workforce, with particular attention to the changing circumstances of migrant women. Ongoing dialogue with migrant communities, women’s organizations, and other stakeholders should inform these updates, ensuring that the taxonomy reflects the lived experiences and needs of those it is designed to serve.
6. **Equitable Access to Resources and Opportunities:** The implementation of the NST should prioritise equitable resource allocation, with targeted training programs and support systems for migrant women. This includes removing barriers to access and participation, such as language barriers or the lack of recognition for overseas qualifications, to ensure that migrant women can fully utilize their skills and contribute to the Australian economy.

Design Considerations for a National Skills Taxonomy

To address the structural inequities inherent in the Australian skills system, the NST must include the following design features:

Comprehensive and Inclusive Skill Recognition

The taxonomy should be based on a broad definition of skill (and competency), including knowledge, capabilities and attitudes along with behavioural measures. It must recognise and value a broad range of skills, particularly those often undervalued in traditional frameworks. This includes relational, caregiving, and community engagement skills, which are crucial for societal well-being. The NST must ensure that these skills are valued equally alongside technical and managerial competencies. This approach aligns with the findings of Gotian and Andersen (2020), who emphasise the importance of recognising a diverse range of skills to avoid perpetuating gender biases.

By recognising and valuing these skills, the NST can help to address the gendered division of labour and the undervaluation of work traditionally performed by women. This is particularly important in sectors such as health care, education, and social services, where the majority of workers are women and where the skills required are often undervalued in comparison to technical skills in male-dominated industries.

Intersectional and Gender-Transformative Framework

The NST should be explicitly designed to address the compounded disadvantages faced by women, people of colour, disabled individuals, LGBTQ+ communities, and other intersectional and marginalised groups. This framework must go beyond simply including marginalised voices to actively restructuring the taxonomy to dismantle systemic biases. It should prioritise the recognition of skills that are essential in marginalised communities and ensure that all contributions are valued and rewarded.

An intersectional and gender-transformative framework recognises that individuals experience multiple forms of discrimination simultaneously, which can exacerbate their marginalization within the workforce. This approach requires a fundamental shift in how skills are recognised and valued, moving away from traditional hierarchies that privilege certain types of work over others and towards a more equitable and inclusive framework that values all contributions.

Inclusive and Context-Sensitive Skill Descriptions

Skill descriptions within the NST should be broad, inclusive, free from gender biases, and reflective of the diverse ways in which skills are acquired and utilised across different sectors and communities. This includes recognising the importance of relational and collaborative skills, which are often undervalued in male-dominated fields but are critical to success in many sectors. The language used in the taxonomy must be inclusive and culturally sensitive, ensuring that it resonates with and is accessible to all members of the workforce.

This principle is supported by the work of Buchanan et al. (2000), who argue for a more context-sensitive approach to skills recognition that takes into account the diverse ways in which skills are developed and applied across different sectors. They emphasise the importance of recognising the social and cultural contexts in which work is performed and ensuring that these contexts are reflected in how skills are described and valued.

Implementation Considerations

Governance and Maintenance

The governance structure of a National Skills Taxonomy (NST) is critical in ensuring that the taxonomy serves the diverse needs of Australia's workforce while upholding the highest standards of equity, inclusivity, and responsiveness. The Australian Government's discussion paper rightly emphasises the need for robust governance and proposes several models for consideration. WAVE concurs with the importance of robust governance and advocates for an independent agency to oversee the NST to ensure impartiality and to protect against any biases or undue influence from conflicted stakeholders. Below are the justifications for WAVE's specific governance recommendations, incorporating key principles of equity, continuous updating, and inclusive resource allocation:

1. The Necessity of Independence and Impartiality

The discussion paper outlines the need for a governance model that ensures transparency and independence. WAVE strongly supports this view and argues that establishing an independent governing agency is crucial to achieving true impartiality in the NST's development and implementation. This agency should operate autonomously from existing government departments and industry bodies to prevent any conflicts of interest and ensure decisions are made based on the public interest rather than narrow sector-specific priorities.

An independent agency would be best positioned to develop an NST that is equitable and inclusive, free from undue influence, and focused on the long-term needs of Australia's diverse workforce. Such an agency would also ensure that the taxonomy reflects the needs of all workers, particularly those from marginalised and underrepresented groups.

2. Strengthening Transparency, Accountability, and Inclusive Stakeholder Engagement

The discussion paper emphasises transparency and accountability as key components of governance. WAVE agrees and further advocates for a governance structure that incorporates diverse stakeholder voices, particularly those of women, intersectional and marginalised groups. By ensuring that these voices are central to the decision-making process, the NST can evolve in response to the needs and feedback of those most affected by it.

WAVE recommends regular public reporting, independent audits, and a formal grievance process to strengthen accountability. Additionally, continuous and participatory stakeholder engagement is crucial for maintaining the relevance and responsiveness of the NST. This approach aligns with the recommendations from Jobs and Skills Australia (JSA, 2023), which highlight the importance of involving a diverse range of stakeholders to ensure that the skills system is responsive to the needs of all workers.

3. Safeguarding Against Conflicts of Interest

The government's discussion paper acknowledges the potential risks associated with conflicts of interest in the governance of the NST. WAVE underscores the importance of implementing strict conflict-of-interest policies to ensure the integrity of the NST. These policies should require full disclosure of any potential conflicts and enforce the recusal of individuals from decisions where a conflict exists.

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An independent oversight committee would be essential in monitoring adherence to these policies, ensuring that no single stakeholder group can exert undue influence over the NST. This safeguard is vital to maintaining the impartiality of the taxonomy and ensuring that it serves the broader public interest rather than specific commercial or political agendas.

4. Ensuring Inclusivity and Diversity in Governance

The discussion paper explores various governance models that incorporate stakeholder representation. WAVE strongly advocates for governance structures that prioritise inclusivity and diversity. This means ensuring that the governing body and advisory panels reflect the rich diversity of Australia's population, including gender, racial, cultural, and regional representation through effective stakeholder engagement.

Diverse and inclusive governance is not only a matter of fairness but is also essential for ensuring that the NST addresses the specific needs and challenges faced by various communities, particularly those that have historically been marginalised or excluded. By including experts in gender equality, intersectionality, and equity, the governing agency can ensure that the NST promotes a more inclusive and just workforce.

5. Commitment to Continuous Updating and Adaptation

In a rapidly changing world, where new technologies and industries are constantly emerging, the NST must be regularly updated to remain relevant and responsive to the evolving needs of the workforce. WAVE recommends that the governance structure include mechanisms for continuous learning and improvement, with updates informed by ongoing dialogue with marginalised communities. This ensures that the NST remains flexible and adaptable, recognising and valuing the evolving needs and contributions of all workers.

Regular updates to the NST are essential for ensuring that all workers, regardless of their background, have the opportunity to develop the skills needed to thrive in the 21st century. By integrating feedback from diverse stakeholders and responding to emerging trends, the NST can support the ongoing development of a dynamic and resilient workforce.

6. Equitable Resource Allocation and Access

The discussion paper also addresses the need for equitable resource allocation within the skills system. WAVE strongly supports this principle and advocates for a governance structure that ensures resources are allocated in a way that addresses the specific needs of women, marginalised groups, and underrepresented sectors. This includes providing targeted training programs, resources, and support systems that enable these groups to thrive and active support for civil society as partners in the process.

As highlighted by McGrath and Yamada (2023), a more equitable approach to resource allocation in vocational education and training is essential for addressing systemic barriers that prevent marginalised groups from accessing and participating fully in the workforce. The NST must be designed to remove these barriers and ensure that all individuals, regardless of their background, have opportunities to develop and apply their skills.

Conclusion

WAVE strongly advises against the creation of a National Skills Taxonomy that does not prioritise intersectional and gender-transformative principles. If a taxonomy is deemed necessary, it must be designed to actively dismantle the structural inequities embedded in the Australian skills system. The NST must promote equity, inclusivity, and transformation by recognising and valuing a diverse range of skills, addressing the unique needs of marginalised groups, and ensuring that all workers can contribute meaningfully to the workforce.

We have provided evidence and arguments on the dangers of implementing a skills taxonomy that reinforces existing gender biases. To avoid these pitfalls, the NST must be developed with a strong focus on intersectional equity and gender transformation, ensuring that all skills and contributions are recognised and valued. By following these recommendations, Australia can develop a more inclusive and equitable skills system that supports all members of society and contributes to a more just and prosperous workforce.

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