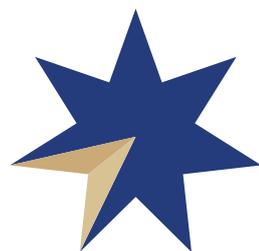


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Submission to the Vocational Education and Training Review

January 2019



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and Industry

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Executive Summary

Vocational Education and Training (VET) is a highly valuable system developing the skills needed for a modern economy. It is often associated with construction, electricians, printers, metal engineers, chefs, hairdressers and other sectors reliant on trade qualifications. However, in reality, VET permeates the whole of society, developing and enhancing skills in occupations ranging from pilots to musicians; office workers to travel and real estate agents; and safety inspectors to enrolled nurses to name but a few.

For many occupations, a VET qualification is a requirement either as part of a licensed occupation such as plumbers, or a regulatory requirement such as in childcare. Particularly in these industries, interruptions to the pipeline can create significant economic and job impacts, as well as disruption to services. Even for those occupations where the qualification is not a requirement, the skills delivered by VET improve productivity, instil confidence and prepare people for work.

Our VET system needs to be the best it can possibly be. At the delivery end, the news is generally positive: employer and student satisfaction is strong; over 4 million students were enrolled in 2017 with over 750,000 program completions. Over half of the subject enrolments receive no government funding which demonstrates that employers and students willingly reach out to the system on a fee for service basis.

However, for those who take a birds eye view of VET, they see a system straining under policy inconsistency and declining funding. There is no longer a shared vision that would recognise the importance of the system and how it should be developed and funded into the future. Industry leadership is needed across the whole system, and in providing advice to the Commonwealth. This leadership and advice needs to be better informed by a workforce development strategy, which identifies skill needs and assesses the gaps in the education and training system.

More still needs to be done for apprenticeships and promoting VET as an equal pathway to a job. The focus on apprenticeships within the partnership agreement was welcome, but the execution has fallen short of the promise. We need an industry national apprenticeship board to focus collective attention on where the effort could be better directed and also to start looking at more nationally consistent approaches.

Underpinning any action taken to improve VET, the core premise remains that, VET is an industry-led competency based system, built around the skill standards identified by industry, for the jobs of today and tomorrow.

Summary of recommendations

The submission contains a number of recommendations that involve both short and longer-term actions to improve VET. For convenience, and in the context of the timing of this review, the recommendations marked with an asterisk are those that can be actioned immediately.

Recommendation 1: VET Core Principle*

An industry-led competency-based system built around occupational skill standards remains a core principle for VET.

Recommendation 2: Shared Vision for VET*

Create a platform for industry and Governments to develop a shared vision and plan for the future of VET.

Recommendation 3: Workforce Development Strategy*

The Government should complete the consolidation of resources focused on labour market and skills needs analysis, and allocate sufficient resources to deliver an updated workforce development strategy in 2019-20 and every second year thereafter.

Recommendation 4: Review ANZSCO*

Commit to fund a review of the ANZSCO immediately and ensure that there is a budget allocation in 2019-20 for the execution of the review.

Recommendation 5: Governing Body

The governance body for VET should be a national industry led body.

Recommendation 6: Roles and Responsibilities

Over time, implement a national approach to VET funding and policy development to improve consistency and skills outcomes, and minimise inefficiency and duplication between the activities of the Federal, State and Territory governments.

Recommendation 7: Federal Advisory Body*

Establish a commonwealth industry advisory body to provide advice to the Federal Minister and Department of Education and Training on the operation of the VET system.

Recommendation 8: Qualifications

Skill standards and their qualifications should still be developed and updated if they are job facing, regardless of the level of enrolment. Qualifications should be removed if they are not job facing and there is minimal take up.

Recommendation 9: Accredited Courses

Accredited courses approved by ASQA should be reviewed by the relevant IRC either before or at the next available opportunity after approval in order to determine if they should be taken up in the training package or otherwise advice be given as to the relevance of the course to industry needs.

Recommendation 10: Course Duration *

Amend the training package standards to implement the second recommendation of the ASQA Strategic Review into Unduly Short Courses, and ensure IRCs have greater access to evidence of delivery concerns with their packages and more information about options they have on how to address them.

Recommendation 11: Choice

Continue to support student and employer choice of VET provider in order to ensure providers perform to the standards required by industry and remain responsive to the needs of students.

Recommendation 12: Skilling Australians Fund*

Implement a kick-start apprenticeship incentive in 2019 utilising the unallocated funds from the SAF program.

Maximise the return on investment in apprenticeships by establishing a program to assist each industry to identify the most appropriate pre-apprenticeship and school-based pathways in order to deliver the best outcomes for students and job seekers.

Recommendation 13: Clarity about Apprentices and Trainees*

Trades apprenticeships should be known as apprenticeships and non-trade apprenticeships as traineeships.

Recommendation 14: National Apprenticeship Advisory Board*

Establish a national apprenticeship advisory body to work with Governments to implement to SAF and to provide advice on growing apprenticeships across the board.

Recommendation 15: Competency Based Progression

The decision as to whether an apprentice progresses to the next skill and wage level in a competency based model should be industry based, with an option for it to be with the employer, subject to the progression being no longer than the annual time periods within the apprenticeship.

Recommendation 16: Better promote Apprenticeships as a career*

At least \$10 million is allocated to the Real Skills for Real Careers marketing strategy turning it into a well-funded campaign connected with industry.

Recommendation 17: Trial an adaptation of Youth Jobs PaTH

Fund a trial of a new PaTH model by offering long-term unemployed youth structured training concurrent to work experience using a traineeship style model. The experience can then be converted to a structured traineeship. This pathway is critical to ensuring training is not just a fulfilment of mutual obligation but leads into something more long-term.

Recommendation 18: Higher VET Qualification Funding*

Establish a process to review the current status and funding of VET diplomas and advanced diplomas and implement a strategy to address the decline.

Recommendation 19: VET Student Loans

The Government should increase the caps on VET Student Loans where evidence demonstrates inadequacy in covering the cost of delivering quality courses that are meeting industry needs, and reinstate a regular and reliable review of the course and caps list to ensure VSL remains.

Recommendation 20: Quality

Maintain a strong focus on quality across the education and training system, through the professional development of teachers/trainers, strong institutions and effective and a sufficiently resourced national regulator.

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1 Introduction

Australia needs a robust vocational education and training (VET) system capable of delivering quality outcomes that meet the skills needs of industry and boost workforce participation and social inclusion. A strong system of both public and private providers, underpinned by a well-resourced national regulator operating in a client focussed competitive environment is needed to ensure that learners and employers are able to exercise choice in accessing the training they need where and when they need it. The growth in knowledge-based industries is placing greater emphasis on the importance of higher education and the acquisition of higher-level skills to meet emerging skills needs.

VET in Australia is a complex system with many moving parts, many stakeholders and funding is inconsistent across the States and Territories and often difficult to decipher. Much of this complexity arises from a federated environment.

This submission tackles some of the key issues around VET but it is not exhaustive in its approach given the short time frame for the review. This VET review should be seen as a taster – the ability to shine a spotlight on a few key issues – as well as an opportunity to initiate change. The road to a stronger long-term future for VET is a much longer one involving the need for industry and all Governments to work together: recognising the strengths and weaknesses of the system, and identifying a shared vision for the future and the path to achieve it.

2 Context

2.1 Size of VET

Over 4 million students were enrolled in VET in 2017 with over 750,000 program completions. Over half of the subject enrolments receive no government funding¹. In 2017 of the 1.5 million Australians aged 15 to 19, almost a quarter were undertaking VET:

- 14% enrolled in VET as a school student
- 4.4% undertaking an apprenticeship or traineeship
- 5.2% enrolled in another VET program

2.2 Government Funding

According to the National Centre for Vocational Education Research's (NCVER)² new VET funding data summary, in 2017, states, territories and the Commonwealth spent \$6.1 billion on VET:

- \$4.6 billion went directly to registered training organisations (RTOs) for VET delivery.
- \$614.5 million on assistance for employers, such as incentives for employing apprentices and trainees, grants, and other support services.

¹ NCVER, <https://www.ncver.edu.au/research-and-statistics/publications/all-publications/total-vet-students-and-courses-2017>

² NCVER (2019), *Government Funding of VET 2017*, National Centre for Vocational Education Research

- \$71.9 million went towards directly supporting students in their studies, including support for equipment, travel and other costs, completion incentives, and wrap-around support services.
- \$219.8 million on capital investment, including new assets and infrastructure, or on upgrading existing infrastructure.
- \$610.8 million on administration of the overall VET system, including funding government departments and relevant authorities.

As this is a new data series, there is no direct comparator with the previous year³. However, the most recent analysis the Australian Chamber has undertaken on VET Funding using the previous data series⁴ (figure 1) illustrates the decline in VET government funding (Commonwealth and states and territories) over time. This analysis excludes Commonwealth's student loan schemes (VET FEE HELP, trade support loans and VET Student Loans). Funding hit rock bottom in 2016, a reflection of the decrease largely from states and territories and although there is a slight recovery in 2017, it is nowhere close to the highs of 2012-2013.

The analysis also excludes employer incentives funding that is paid by the Commonwealth to apprenticeship employers, as these are not included in this previous NCVET funding series. From the Federal Budget papers, it is clear that employer incentive funding has substantially declined (by around two thirds), both as a result of major changes made to incentive payments in 2011-2012 and most recently by the reduction in apprenticeship numbers. If the employer incentives funding had been included in the analysis, the picture would look even worse.

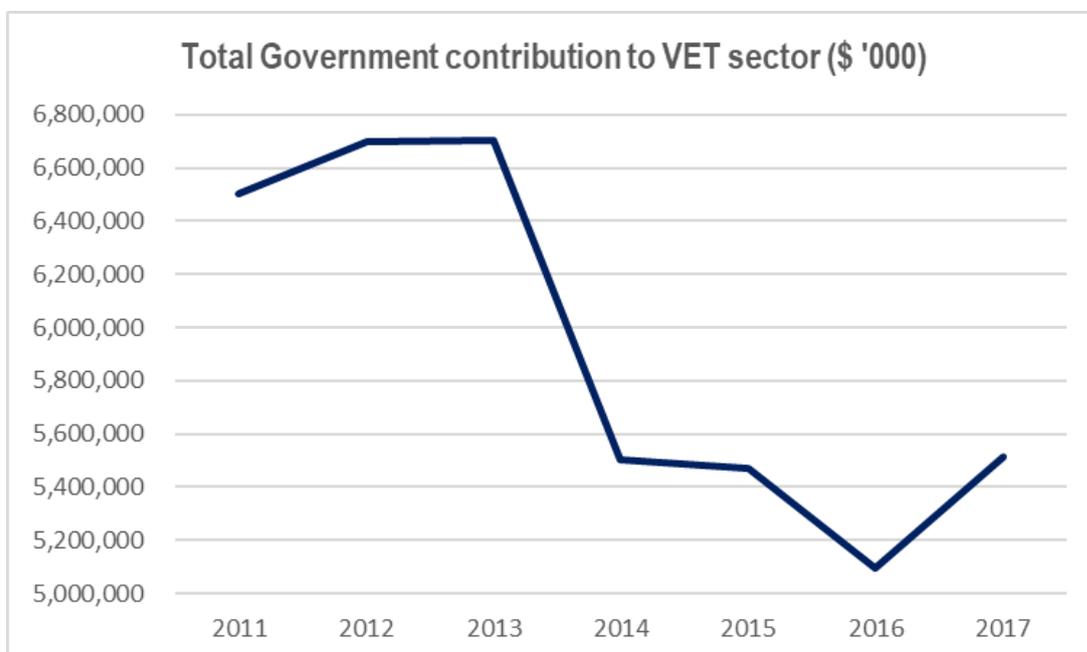


Figure 1: Total Commonwealth and State Government Contribution to the VET sector

³ NCVET (2018), VET funding

⁴ NCVET (2018), VET Finance and Funding

2.3 Employment Outcomes

Over 85% of graduates and almost 89% of subject completers undertake their training for employment-related reasons, and the system delivers employment outcomes for graduates and subject completers⁵.

- 59% of graduates improved their employment status after training.
- 46% of subject completers improved their employment status after training.
- Of graduates employed after training, 71% received at least one job-related benefit which was a 3.5 percentage point increase compared to 2017.
- 80% of apprentices (including trainees) were in employment after training, and 91% of those did a trade apprenticeship.

2.4 Student Satisfaction

Student satisfaction surveys show a robust level of satisfaction.

- 87% of graduates and 90% of subject completers were satisfied with the overall quality of training.
- Almost 35% of subject completers did not finish their qualification as they got what they wanted out of the training. Less than 5% said that they did not complete because the training was not flexible enough.
- 91% of graduates would recommend the training, and 90% would recommend their training provider.
- The levels of satisfaction across different provider types is only one or two percentage points of difference.

56% of those graduates from the most disadvantaged quintile improved their employment status as compared with 61% from the least disadvantaged. Satisfaction of the most disadvantaged group with the quality of training at 88% is higher than all other groups.

2.5 Employer Satisfaction

Over the last ten years, the level of satisfaction of government-funded graduates has been consistently around 87%. However, employer satisfaction with VET overall has declined in the last few years from a high point in 2011 as figure 2 from NCVET's Survey of employer use and views 2017⁶ reflects.

⁵ NCVET (2018), VET Student Outcomes

⁶ NCVET (2017), Survey of employer use and views 2017

Employer Satisfaction with training	2005	2007	2009	2011	2013	2015	2017
Employers satisfied with vocational qualifications as a job requirement <i>(Base: all employers with jobs requiring a vocational qualification)</i>	77.0	80.7	83.3	84.6	78.3	76.2	75.4
Employers satisfied with apprentices and trainees <i>(Base: all employers with apprentices/trainees)</i>	78.7	83.2	83.3	82.9	78.8	81.7	77.5
Employers satisfied with nationally recognised training <i>(Base: all employers using nationally recognised training)</i>	81.3	82.0	86.3	89.2	83.1	84.0	82.2

Figure 2: Employer Satisfaction with Training

3 The Bedrock of VET

An industry-led competency-based system built around occupational skill standards must remain as the bedrock of VET.

3.1 Competency based

The vocational system is purposely not curriculum based. A system based on skill standards delivers a focus on outcomes and reinforces its practical and relevant approach to modern workplaces.

There may be submissions by some other stakeholders that VET should no longer be focused on skills needed for specific occupations, but instead should be more generic under the guise of adaptability. Any reform that seeks this outcome is strongly opposed by industry.

Evidence in both VET and higher education shows that vocationally focused course graduates do better in the employment marketplace than those that have studied courses that are more generic. Education is a strong enabler, but a single qualification is not the sole or even primary source of skills throughout a person's career. Even advanced courses such as veterinary science and medicine in higher education have a practical component to deliver a reinforcement of knowledge acquired and then followed by lifelong professional development. In VET, any tradesperson would suggest that skills acquired on the job are the most important.

The first step for any graduate is to secure a job in their chosen field. To achieve this, they are best served by presenting to potential employers with relevant skills for that job. Therefore, attaining a job and relevant skills that provide the springboard for future success is far more valuable than a generalist qualification. Adaptability will come from commitment to lifelong learning and experience across a range of work environments.

Therefore, industry will not tolerate any attempt by other stakeholders to water down the job-facing nature of VET. This strongly stated position does not mean that specific industries may not see the benefit of adopting more units that are common across occupational qualifications such as the decision taken by some health and community care reference committees. The current system

allows for this through the adoption of underpinning common skills base where there is evidence that all jobs in that sector will benefit from those common skills. The position also does not prevent the already commenced action to develop some common competency units that could be used across industries.

3.2 Industry-led

It is critically important that industry leaders with a strong knowledge of VET as well as industry needs should be the greatest influencers on the system.

Given the high importance of VET to the economy and skills development, it is often puzzling why the following has been the policy reality over the last decade:

- Frequent changes in leadership, both at the Federal ministerial level and in governance arrangements.
- Declining funding, both in real terms and in comparison to the significant growth in funding for other education sectors.
- Lack of support in central government agencies for VET.
- Questioning of the role of skill standards, and looking for different models such as capabilities or less job-specific training.
- Inconsistent attendance by Ministers at the COAG Skills Ministers meetings including situations where there has been no quorum to conduct formal business
- Inconsistent policy and funding support for apprenticeships and a questioning of the relevance of the model into the future, with pressure to accelerate or otherwise change it.

There may be many reasons for this state of affairs, but one of the key reasons is a structural lack of understanding amongst decision and policy makers about VET. Most public servants, academics, and politicians have not undertaken VET, and their experience is often limited to seeing how schools and careers advisors directed many 'non-academic' students into VET pathways. This must make an impression.

In the last few years, we have seen in the context of questioning the apprenticeship model, a first Minister ask our plumbing industry member why someone can't just become a licensed plumber after 12 months spent at college. It is certain that the same leader would not question the need for a doctor, nurse or dentist to undertake extensive training coupled with work experience before obtaining a licence to practice.

For this reason, and others, the system must be industry-driven and industry-led. Leaders that run the system need to highly rate the skills acquired through VET and the importance of the integration of learning with experience.

Policy Recommendation

An industry-led competency-based system built around occupational skill standards remains a core principle for VET.

4 Lack of a Shared Vision

We have lost both a shared vision for vocational training and a collective understanding of what the skill needs are for the future and whether our education system is able to deliver those skills.

It is rare to find any stakeholder in the vocational training sector who believes the system is better now than it was ten years ago. Not only has the sector been impacted by falling investment by all governments, its reputation has also been dragged down by controversy. The VET FEE HELP debacle, where many students were encouraged to take up loans for courses unsuitable to them, the controversy over TAFE SA's delivery of substandard courses and the response by some State Governments to the budget blowouts when attempting to introduce an entitlement to training have all contributed to the diminished reputation of VET.

We have lost the vision for the sector that the Commonwealth and the States and Territories shared with industry in the days of the Australian National Training Authority (ANTA) and, instead, there has been a lot of blame shifting and ad hoc approaches. There no longer is a high-level platform where government and industry can agree on a vision and a plan for VET that will take us into the future with confidence. When the COAG Skills Ministers meet, they do not invite industry to the table, and even the token industry forum that preceded their meeting no longer exists.

This review, or any other federal review undertaken, is only the initial step in putting forward recommendations for consideration. An industry-led system requires key stakeholders to sign off on a future plan, not just march along as interested observers to a plan developed by a single government.

Policy Recommendation

Create a platform for industry and Governments to develop a shared vision and plan for the future of VET.

5 Workforce Development Strategy

The last workforce development strategy for Australia was in 2013. A collective commitment to develop another one is long overdue.

The improvement in labour market analysis and forecasting in the Department of Jobs and Small Business is acknowledged. However, there is a long way to go before decisions regarding skills and training needs, skilled migration occupation lists and employment policy and programmes are consolidated. It is essential that this rationalisation continues and then leveraged to ensure strong analysis of current and future skill needs is released to industry and career planners in a timely manner.

The now-disbanded Australian Workforce and Productivity Agency previously issued a biannual workforce development strategy from 2008 to 2012. It also worked with state and territory workforce planning experts. Whether this function is performed by a separate agency, or within a department

operating with the support of an independent advisory board, it is essential that a process to develop a strategic plan for workforce development be put in place. A regular workforce development strategy will make the connection needed between labour supply and demand, and identify gaps in the skills development effort. This effort is broader than just VET, as it also incorporates skills developed through higher education.

The previous process drew input from all of the key stakeholders and provided a platform for all Governments and industry to have a conversation about the future direction for developing the Australian workforce. We may not have always agreed on the conclusions, but the commitment to having a strategy, and the process to arrive at one, is much better than the current situation where there is neither a process nor a strategy. Without this, there can be no accurate assessment of whether the education system is up to the task of delivering future skills needs.

Policy Recommendation:

The Government should complete the consolidation of resources focused on labour market and skills needs analysis, and allocate sufficient resources to deliver an updated workforce development strategy in 2019-20 and then every second year thereafter.

5.1 Review ANZSCO

One of the pillars of labour market statistical infrastructure is the Australian and New Zealand Standard Classification of Occupations (ANZSCO). This infrastructure underpins a wide range of labour market data, including information from the Census, and is used for job outlook information and to regulate which occupations are eligible for migration programmes.

Despite major changes to the economy and jobs, including new jobs driven by technology as well as changes to the level of skill needed in certain jobs, ANZSCO has only been reviewed twice since its introduction in 2006 (having transitioned from the previous ASCO codes). A major review of ANZSCO is long overdue. However, the Australian Bureau of Statistics (ABS), custodians of the statistical product are unable to commence a review due to labour and resource constraints and competing priorities. Regular review of major statistical infrastructure such as the ANZSCO needs to be built into the normal operating budget of the ABS. The ABS has not even committed to a review in the future, only that it will be considered post the 2021 Census process.

All occupations are experiencing technological progress and the nature of work and job roles are constantly changing. ANZSCO not only identifies new jobs, but it also appraises the duties within their job and assigns an appropriate skill level. A large number of stakeholders across the economy share our concerns, including colleagues from Business NZ. The 2018 OECD Report on *Getting Skills Right in Australia* also highlighted the need to update the ANZSCO since emerging occupations such as cyber security, artificial intelligence experts and others were not included in the current classification.

According to the ABS Forward Work Program released October 2018, the resource required to fully implement the review, is \$4 million.

Policy Recommendation:

Commit to fund a review of the ANZSCO immediately and ensure that there is a budget allocation in 2019-20 for the execution of the review.

6 Governance and funding

One of the most challenging areas of VET policy is around governance, including the confusion surrounding who has responsibility for VET.

At the federal level, we have had ten skills Ministers in six years – four from the ALP and six since the Coalition came to office in 2013.

In the last seven years, there have been a few attempts made at addressing governance and responsibility for the VET system:

- In 2012, the National Panel for Economic Reform, headed by the Prime Minister had VET reform as one of the four key early priorities;
- In 2013-14, it was announced that a Federation White Paper would be developed which would have included VET; and
- In 2015-16, the first Ministers of COAG indicated that VET was ripe for reform, and reports were drafted.

In none of these circumstances did any final report emerge which addressed the core issue of who should govern, set policy and fund VET. Indeed no final report emerged at all.

There has been some reform. In 2014-15, there were changes to the training provider standards and a new system for training product development was implemented to create the Australian Industry and Skills Committee (AISC), and replace the twelve Industry Skills Councils with Industry Reference Committees and Skills Service Organisations (SSOs).

It would seem that tackling the bigger issues of roles and funding responsibilities within a federated environment has been put into the 'too hard basket'. This review may serve as a starting point, but the final solution will need to be one agreed between all governments and industry.

6.1 Roles & Responsibilities

Constitutionally, VET is a State Government responsibility. However, like many other areas, VET has increasingly become a shared responsibility. Over time, there has been a rationalisation of arrangements that saw the development of national competency standards, a national training product development process, national RTO standards and a (near) national regulatory approach. The Commonwealth has also stepped in to fund apprenticeship incentives and support services, as well as various targeted programs.

With a clearer approach to governance, much of the current complexity as to roles created within the federated environment could be alleviated. Responsibility could be more clearly divided in many ways. For example, all apprenticeships and employer facing training (for example, workforce development funds) could be Commonwealth's responsibility (policy and funding) and all student

facing VET could be left to the States, with the State-owned providers participating in the delivery of the Commonwealth funded training. This is longer-term thinking, and requires a consensus between industry, the Commonwealth and the State and Territory governments in order to execute the solution.

In the meantime, we need a collective commitment to move towards a system that is more equitable and consistent across the nation and avoids duplication of effort and cost shifting. This requires a mechanism to achieve this, most particularly through appropriate governance and advisory arrangements.

Policy Recommendation

Over time, implement a national approach to VET funding and policy development to improve consistency and skills outcomes, and minimise inefficiency and duplication between the activities of the Federal, State and Territory governments.

6.2 Governing Body

The governing body for VET should be industry led.

The AISC as originally envisaged was an industry governance body with a broad brief to provide advice to the COAG Skills Council on the operation of the VET system. In reality, the process of Industry Reference Committees' (IRC) appointments and training package approvals overwhelm the AISC, which as a consequence, provides little strategic input about the operation of the system overall. To further confuse the picture of industry-body, not all the nominees to the AISC made by the State and Territory governments have been industry representatives.

The AISC needs to be seen as an industry body and to take a broader strategic system leadership orientation. At present, it is the only body in the system with a remotely relevant structure to govern, but at present, it does not govern at all. To do so, its role needs to be better defined.

As an alternative to using the AISC, an agreement could be struck between industry and governments for a smaller industry governance board (such as the small Board which existed for ANTA) to oversee the system and set the vision and plan for VET, and that the AISC become a subset of the Industry Board.

It is unlikely in the short to medium term that the body would have funding responsibility, but it could monitor and advise on the inequities and inconsistencies in funding and encourage governments to address them.

Policy Recommendation

The governance body for VET should be a national industry led body.

6.3 Funding

Following a similar path to the shift in responsibilities, funding the VET system has become a shared investment. Funding from the Commonwealth in the training and negotiated partnership agreements, as well as direct investment in financing support loans, apprenticeship support and incentives has

seen a trend of the share of the commonwealth funding grow larger, although much of this funding has declined in the last few years.

During the Labor Government years (2007-2013), we also saw the Commonwealth substantially invest in particular VET programs such as the National Workforce Development Fund (NWDF), or specific funding for accelerated apprenticeships or mentoring. Although some new programs have been funded in the last five years, the total commonwealth investment has declined and funding direct VET delivery (such as through a NWDF) has disappeared completely except in very niche programs.

Untangling complexity and reducing inconsistency is a much tougher challenge for funding compared to roles and responsibilities. In most cases, it would be impossible to provide advice to a potential VET student on the likely cost of undertaking a qualification on a national basis. By way of example, training within a retail traineeship could cost the employer significantly more in one state compared to another, and a student seeking to undertake a Certificate III in childcare will attract significantly different subsidies based on the state and increasingly in some states on whether the provider is a private or a public one.

Although in any market the total cost can vary depending on quality and situation, government subsidy should not be so wildly variable. It is unfair. Even equity issues across disciplines cannot easily be tackled when the issues are so different across jurisdictions. By way of example, in most jurisdictions, trade qualifications are almost fully funded whereas childcare or enrolled nursing qualifications are not, even though learners require these qualifications in order to be employed in these occupations.

A national governance body and a national approach to the system should substantially assist in providing a process to identify and reduce these inconsistencies. A national approach should not prevent States and Territory jurisdictions from investing in particular priorities from time to time, but this should be from a more easily understood funding platform rather than the current oblique approach.

6.4 Federal advisory body

In the first few years of the Coalition government, there was a VET Advisory Board so that the Federal minister and department had a structured mechanism for industry advice about VET policy. This Board no longer exists, and the Federal government lacks a direct mechanism for advice that is separate from the AISC and the Senior Skills Official Network (SSON), which are both Commonwealth/State federated bodies.

The Commonwealth needs an advisory group. One already established mechanism that could be leveraged, is the regular meeting of associations within the Australian Chamber group. These meetings are quarterly, and the Minister and Department could commit to regular attendance at these meetings to discuss the key issues relating to VET. This model existed in tourism for a number of years with the Tourism Minister attending each quarterly meeting of the National Tourism Alliance (now Aus Chamber Tourism).

Policy Recommendation

Establish a commonwealth industry advisory body to provide advice to the Federal Minister and Department of Education and Training on the operation of VET system.

7 Training Products

Training products, including the guidelines to develop them, have become increasingly complex. We need to return the tool back to its fundamental use, which is a set of skills standards that are needed to perform the jobs existing and identified as ones likely to exist in modern workplaces.

7.1 More than just a name

The Australian Chamber has long supported a change of name to occupational skill standards, industry skill standards, or just skill standards.

The terms 'training product' and 'training package' do not adequately describe the role these core elements play, and indeed can be misleading. The vocational system is purposely not curriculum based. A system based on skill standards delivers a focus on outcomes and reinforces its practical and relevant approach to modern workplaces.

There is also confusion between the language of training product and training package, with them often used interchangeably when one is a subset of the other. In addition, the term 'accredited course' is confusing, as most stakeholders would believe (with some justification) that all approved VET is accredited.

It is recommended that the terminology be changed as follows:

- Training Packages should be called **Industry Skill Standards** reflecting the process where industry has had a hand in developing them.
- Training Products, currently incorporating training packages and accredited courses, could remain unchanged.
- Accredited courses (which do not currently go through an industry development process) and are approved by ASQA directly, should be called Supplementary Accredited Courses or something similar. This would reflect the view that the primary role for accredited courses not developed by industry is to meet immediate needs not yet incorporated into industry standards.

An appropriate period of transition to accept and incorporate the terminology would be expected.

This recommendation is more than just about names. It is about improving the understanding of the system in the most fundamental way. Industry's main role in training product development (as it is currently known) is to identify the jobs in their sector, the skills needed (including the level of skill) to perform the jobs and the way they should be demonstrated in order to prove competency. Skills standards should be packaged in this simple form for industry sign off.

7.2 Too many qualifications?

One of the criticisms of VET is that there are too many qualifications, many of which have few to no enrolments. We need to be very clear about the causes of this before we consider if it needs a solution. Although some may suggest that the number of qualifications is due to the job facing nature, it is much more likely that the reverse is true in that qualifications have been developed and endorsed that do not face a job.

The system has slipped into the 'training product' mode of concentrating on qualifications, many of which are not job facing. The AISC has recently identified this as a problem and has sought more information about what jobs the qualifications submitted are relevant to. IRCs need to return to the core business – focusing on identifying the jobs currently or likely to be and developing occupational skill standards that are relevant to those jobs and packaging those skills into qualifications.

The concerns about low enrolments should not mean that skills standards are not developed for each job. For a variety of reasons, the industry, students or providers may not seek to undertake these qualifications. These circumstances could include: where the qualification is not funded; if it is not a necessity to undertake the training to perform the work; where the industry has a history of not paying for training; the skill standards are out of date; and/or the IRC has inappropriately packaged the standards in qualifications that the industry does not value.

The skill standards and qualifications should still exist in case the drivers of training take up change. There is no harm in having qualifications that have low enrolments, provided that they are an appropriately packaged set of skill standards that reflect the requirements of a job.

In short, each job where VET level skills are relevant should have occupational skills standards developed and qualifications packaged.

Policy Recommendation

Skill standards and their qualifications should still be developed and updated if they are job facing, regardless of the level of enrolment. Qualifications should be removed if they are not job facing and there is minimal take up.

7.3 Accredited Courses

The increasing use of accredited courses is a concern for industry, as they have not been reviewed by an IRC. They are developed outside of the industry-led process either by States/Territory governments or providers for a range of reasons; from dealing with emerging skills to accessing a qualification that suits the resources, facilities, trainers and circumstances of the day.

The role of accredited courses should be narrowed so that they are only used for particular niches and emerging skills which have not yet been picked up in industry training packages. All accredited courses should then be reviewed at the next available relevant IRC meeting to assess the merits of inclusion within the industry-training package.

Accredited courses with a close alignment to existing industry qualifications should not be approved by ASQA. Consideration should be given that ASQA only approves the accredited course after consultation with the most relevant IRC.

Policy Recommendation

Accredited courses approved by ASQA should be reviewed by the relevant IRC either before or at the next available opportunity after approval in order to determine if they should be taken up in the training package or otherwise advice be given as to the relevance of the course to industry needs.

7.4 Course duration

The Australian Chamber was extensively involved in the strategic review conducted by ASQA into unduly short courses and played a significant role in identifying an appropriate compromise. Within that context, there is continued support for the ASQA recommendations made in their Unduly Short Courses Strategic Review. It is understood that the key obstacle to implementation was the third recommendation relating to product disclosure. This impasse should not prevent the implementation of the second recommendation, which addressed the circumstances under which duration could be considered as an option for training qualifications based on risk assessment and evidence.

The most important points from industry perspective are:

- A competency-based approach is fundamental to VET which means that, as a general rule, proscribing time is inappropriate to the determination of whether a skill level has been achieved. There should only be limited circumstances where risks or conditions could warrant a time prescription.
- Barriers to setting duration for particular units or qualifications currently in the training package guidelines and elsewhere should be removed to accommodate these limited circumstances;
- It **must not be mandatory** for IRCs to set durations for any of their packages. The recommendation of the ASQA report needs to stand – that the IRCs on behalf of industry assess the risk and identify whether there is a need for duration to be set for a particular unit or qualification as either mandatory or as a guide to providers. Any mandatory minimum durations set by the IRCs will then be able to be regulated by ASQA.
- In assessing risks and delivery concern, setting a duration against a qualification is only one of a number of actions IRCs can take to improve outcomes. Better information of what action can be taken should be provided to IRCs to improve their decision making, and better linking the IRCs to the execution of their training packages “in the field”.
- Decisions made by the IRCs relating to the need for duration settings or other risk mitigation action should be based on a better flow of evidence from ASQA, NCVET and other relevant stakeholders.

There are a number of specific examples where qualifications or packages have had a high prevalence of very short courses. Examples that prompted consideration of taking this risk-based approach within a competency based system include the white card qualification for construction and the maritime qualifications, which had the highest prevalence of short courses of any industry examined by the ASQA review. More recently, the Australian Chamber has been concerned about

the Work Health and Safety (WHS) qualifications, where industry has expressed concern about the skill level of graduates who have undertaken courses that have been so short, that it is unlikely competence could have been achieved.

Policy Recommendation

Amend the training package standards to implement the second recommendation of the *ASQA Strategic Review into Unduly Short Courses*, and ensure IRCs have greater access to evidence of delivery concerns with their packages and more information about options they have on how to address them.

7.5 Training package development

A number of concerns raised by stakeholders against the current system are more appropriately addressed by improving the AISC/IRC development process rather than changing the product itself.

Issues raised about development include:

- Industry bodies must have greater say as to who sits on IRCs; there are too many complaints about IRCs being dominated by self-interested suppliers or providers.
- Better information flow to IRCs about how the qualifications in their packages are being used, including issues of quality and misuse.
- Strong and clear guidance to the IRCs from the AISC about how to approach simplification within the packages, the bundling of units into qualifications and the common units earmarked for development, which are or will be available for use within packages.
- Clear and unequivocal reinforcement that the IRCs direct the work of the SSOs and not the other way around, and that the IRCs have sufficient resources to undertake their roles. It was very disappointing to see the allocation of funds to the IRCs significantly reduced due to underspend, when at the same time, many IRCs were seeking more financial resources to support face to face meetings as well as to undertake and inform their work.
- Better resourcing of the work of the IRCs also can in part address the issue of timeliness of the delivery of up to date packages.
- Better responsive from the SSOs to the concerns raised by the IRCs.
- A continued focus on improving the quality of provision. Much of the concerns about training outcomes arise from the quality of the training rather than concerns about the relevance of what is in the training product.
- Making it clearer that IRCs can request to be serviced by another SSO, if they believe the relationship is not working for them as it should. The SSO model was a competitive one but it can only work in this way if the customer has choice.

The WHS package review has been an example where the industry representatives were not satisfied with the consultation undertaken and the changes proposed and it took a very concerted effort to adjust the course that the SSO was charting.

8 Choice

Employers and students need to continue to be offered choice as to which provider best serves their need, both in the funded and the fee for service market. It is unfortunate that funding for private versus public providers has increasingly become a partisan political issue.

'Contestability' for public funding was not the demon in the VET FEE Help debacle. Poor program design, lack of contract standards to access funding as opposed to reliance on the standards for Registered Training Organisations alone, and insufficient monitoring and regulation were the key causes.

Industry is concerned that some governments have limited funding to public providers only, at the exclusion of industry-operated and private RTOs. The training market operates no differently than any other market. Where there is a monopoly offering, then the level of service will decline. When TAFE was the only option in the early years of VET, employers were very concerned about the lack of modern facilities and equipment, the responsiveness to needs and the inflexibility in times available to deliver training. Keeping choice in the system ensures that all providers are competing by offering the best possible service.

Policy Recommendation

Continue to support student and employer choice of VET provider in order to ensure providers perform to the standards required by industry and remain responsive to the needs of students.

9 Apprenticeships and Traineeships

Industry is highly committed to apprenticeships and traineeships in Australia. The combination of work and study offered through an apprenticeship or traineeship gives the learner the best opportunity to learn skills that are directly relevant to work and to enable them to gain an immediate context for their learning as they apply their newly developed skills on the job.

In the last seven years, a considerable number of detrimental changes have been made to the incentive and support structures that underpin the apprenticeship system. The changes to incentives announced in Federal Budgets and Mid-Year Economic and Fiscal Outlook (MYEFO) statements between 2011 and 2013 clearly show that incentives drive behaviour particularly with traineeships. Changes to State Government training funding have also had a major impact, particularly to traineeships. When the value proposition of employing an apprentice or trainee is diminished, employers become increasingly reluctant to engage with the system.

9.1 Skilling Australians Fund

Recommendations for solutions to encourage uptake in apprenticeships needs to be done in the context of work in progress at both the State and Federal levels. The Skilling Australians Fund (SAF), focused on apprenticeships, is the most significant new initiative of the Federal Government within VET since 2013 (with an acknowledgement that the level of funding and implementation channel was a replacement for the previous national partnership on skills that expired in 2016). The SAF has

taken a long time to come to fruition, and it is disappointing that Victoria and Queensland have not entered into agreements to match funding on apprenticeships.

Given the uncertainty about what would happen to the funds that would have been allocated to those two states, the Australian Chamber welcomed the Government's affirmation made in November 2018 that all monies collected under the SAF Migration Training Levy will be invested in the VET sector.

The unallocated funds in SAF arising from the non-participation of Victoria and Queensland and the underspend in 2017-18 should be applied to:

- An additional kick-start commencement incentive to employers of at least \$2500 for trade apprentices and \$1500 for trainees to operate from budget night (or at latest 1 May 2019) for eight months to 31 December 2019.
- Promotion of the kick-start incentive throughout the period.
- Extra support for industry mentoring over the six month period to focus on completions of trade apprenticeships.
- Making the Skills for Education and Employment (SEE) program eligible to participants who commence an apprenticeship/traineeship. The SEE program uses the Foundation Skills Training Package and could support commencing apprentices with language literacy and numeracy skill deficiencies in the first critical period of an apprenticeship.
- Program aimed at improving pre-apprenticeships and apprenticeship pathways from school (see below).

Key features of this proposal are:

- It focuses on traineeships as well as trade apprenticeships.
- It is supported by evidence. It was clear from the removal of incentives for traineeships in 2012, the impact this loss had on the number of commencements. For the trades, the evidence from the last 'kick-start' additional incentive in 2008 also strongly supports its chance of success.
- That the incentive should be applicable to all trainees and apprentices including those excluded by the damaging 2011-12 changes such as Cert II, part time and existing employees traineeships but with appropriate boundaries that address concerns. For example, employers of trainees who are transitioning from casual work while at school to a full time traineeship post-school should be eligible, as should trainees employed on return to work after caring responsibilities who may only be able to work part time. In addition, Cert II incentives could potentially only be available to small businesses.

The return on investment in apprenticeships through the SAF and other federal and state programs will be improved by focusing on two key areas of reform.

Pre-apprenticeships are a key feature of the SAF, and it is important to ensure various different approaches do not emerge based on small industry groups or individuals operating at state level. Industry is keen to play its part in that coordination, but a more efficient and effective approach will

need to be initiated. To achieve this, a review of pre-apprenticeship pathways on an industry by industry basis is needed to encourage the coordination and establish clearer guides to what will be acceptable. This will also capture what pre-apprenticeships could be delivered in schools, and ensure that problems created by competency-based progression do not limit the opportunities for young people to take up apprenticeships beyond school.

VET for School Students - With a similar goal in mind, the Government also needs to also establish a program or process at the national level that:

- Provides guidance to schools from industry as to the most suitable vocational training qualifications for their industry to be delivered to school students.
- Examines the barriers to school based apprenticeships while working with industry, state and territory governments and school sectors to improve opportunities.
- As a complement to VET delivered at schools, explores the possibility of an applied learning elective subject(s) in Year 11 and/or 12 that allows students to apply academic learning in practical contexts and incorporates pre- apprenticeships or VET pathways that will better articulate to further education and apprenticeships beyond school.
- Differentiates vocational learning from VET with the aim of ensuring that VET qualifications are only delivered when the ingredients for quality delivery exist; otherwise develop a more common view of the opportunities for vocational learning that will achieve school goals of engagement as well as employability outcomes.

Policy Recommendation:

- Implement a kick-start apprenticeship incentive in 2019 utilising the unallocated funds from the SAF program.
- Maximise the return on investment in apprenticeships by establishing a program to assist each industry to identify the most appropriate pre-apprenticeship and school-based pathways in order to deliver the best outcomes for students and job seekers.

9.2 Clarity about apprentices and trainees

The federal government should adopt, and encourage other stakeholders including the COAG Skills Council to adopt (effectively revert to), the language that trades apprenticeships are known as apprenticeships and non-trades apprenticeships as traineeships. This does not preclude discussion about an apprenticeship system to be inclusive of both, but there is strong support for a reversion to using language that adds clarity. It is also recognises that the policy responses can be different for apprentices and trainees. For example, financial incentives and training subsidy levels are key drivers for trainees; for apprentices, wage costs are a major factor, and mentoring is important to improve completions.

Policy Recommendation

Trades apprenticeships should be known as apprenticeships and non-trades apprenticeships as traineeships.

9.3 Establish a national apprenticeship advisory board

The Australian Chamber has been an advocate for a national apprenticeship leadership body since before the SAF was announced and has consistently argued that the SAF negotiations would have been improved and completed in a more timely way if an advisory board had been established on commencements of the SAF negotiations. It is not too late to act.

The apprenticeship advisory board will seek to inform the implementation of projects submitted under the Skilling Australians Fund National Partnership Agreements, as well as provide input and oversight on national reform projects (as suggested above) and improvements to the apprenticeship system including promotional effort. The Board would also be well positioned to examine any issues in the apprenticeship system that are creating barriers for take up by either the employer or the job seeker.

With agreement through COAG, the advisory board could become a national trades' board enabling the efficient delivery of national recognition of qualifications for trades and apprenticeship and traineeship pathways. It is an inefficiency in the system that industry has to deal with eight jurisdictions to advocate for a qualification to be recognised as an apprenticeship, and the differences across the jurisdiction create unnecessary confusion.

Policy Recommendation

Establish a national apprenticeship advisory body to work with Governments to implement to SAF and to provide advice on growing apprenticeships across the board.

9.4 Competency Based Progression

One area that has caused considerable concern for some industries has been competency-based progression for apprentices in the context of industrial awards. There is a feeling amongst many employers in industries where this is an issue that they have lost control of how and when apprentices progress through the wage levels.

It is recommended that the decision as to whether an apprentice progresses to the next skill and wage level in a competency based model should be industry based, with an option for it to be with the employer, subject to the progression being no longer than the annual time periods within the apprenticeship. Industry are in the best position to assess the trust in the training provider and the needs of the business. This becomes part of the job offering, and the choice for apprentices when seeking positions and should be clear on commencement.

The plumbing industry is a good example of the difficulties associated with institution sign off on competency. In their view, provider sign off may be suitable in situations where the work that the individual is being assessed for is somewhat repetitive or limited in variation of outcome for example factory work, bricklaying, etc. The plumbing industry has a much broader base of activity and achieving proficiency in the plumbing trade does not just rely on repetition of the same task, but experience gained on a variety of tasks. This is only achievable via supervised work-based scenario.

Policy recommendation

The decision as to whether an apprentice progresses to the next skill and wage level in a competency based model should be industry based, with an option for it to be with the employer, subject to the progression being no longer than the annual time periods within the apprenticeship.

9.5 Better promote apprenticeships as a career

The Government needs to better promote apprenticeships and VET to job seekers and employers. The \$5.4 million over four years announced in 2018 MYEFO to promote apprenticeships is a useful beginning but more is needed, including a broader link to VET promotion generally. The mechanism of having the promotion coordinated by World Skills is untested so industry will be closely monitoring this approach to marketing.

Although there is national effort already in this area with websites, champions and other channels for promotion, there is a need for a national communications strategy and a coordinated and well-funded campaign to promote apprenticeships and traineeships and the VET sector overall. VET is a rewarding and positive pathway for school leavers and develops the skills needed for the future. Another important component is improving information about VET courses and job comparisons as well as accurate information about the benefits of an apprenticeship, especially to careers advisers in schools. Career Advisers are often not full time in that task, and are not sufficiently resourced or equipped to provide up to date information on the benefits of an apprenticeship.

The Government has an opportunity to correct this through the current marketing strategy named 'Real Skills for Real Careers'. Although it is a step in the right direction, it is not supported by any resources, and needs to be well funded to create impact in the market. It also needs to be inclusive of industry input as to what is the best approach and be backed by industry activity that is funded as part of the campaign. For example, a decade ago, there was successful program of funded national industry careers advisors, embedded in and working with industry to connect with schools and careers advisers. This type of program is worth revisiting.

Policy Recommendation:

At least \$10 million should be allocated to the Real Skills for Real Careers marketing strategy turning it into a well-funded campaign connected with industry.

9.6 Trial an adaptation of PaTH with a link to apprenticeships

For the last few years, the publicly funded employment services system has included a program called Youth Jobs PaTH aimed at youth unemployment to provide training and experience for the young long term unemployed. Unfortunately, the current PaTH program does not sufficiently link to either the VET system generally or the apprenticeship pathways specifically. Strengthening the links between employment programs (such as PaTH) and the VET sector should be a key focus, with incentives for service providers in linking young people into employment and training opportunities.

The Australian Chamber's original PaTH model was a traineeship style arrangement, where the vocational training was concurrent to the work experience component. This model embraced strongly embedded industry vocational training with units delivered from a certificate II or III traineeship by an RTO. The training could then be recognised should the experience convert to a traineeship, or at the least was relevant to ongoing work in the industry. The PaTH program should become a mechanism to encourage the uptake of more apprenticeships and traineeships.

Policy Recommendation:

Fund a trial a new PaTH model by offering long-term unemployed youth structured training concurrent to work experience using a traineeship style model. The experience can then be converted to a structured traineeship. This pathway is critical to ensuring training is not just a fulfilment of mutual obligation but leads into something more long-term.

10 Higher VET Qualifications

10.1 Funding

The number of students completing higher level VET (diploma and advanced diploma) is in serious decline. When VET FEE Help was broadened in 2011-12 from one where loans were limited to fund a pathway for students to higher education to one where all VET higher-level qualifications were included, delivery grew exponentially as providers took advantage of the program design. Most importantly, at the same time many states and territories reduced their funding of higher-level qualifications.

The market for higher-level qualifications has not recovered from this turbulent period.

The future of funding of higher-level qualifications needs a stronger, more strategic national approach. A workforce development strategy process would greatly assist but the urgent need to arrest the decline may mean it cannot wait.

A medium to longer-term review of the funding of higher-level qualifications in VET must also occur in the context of a broader look at sub-bachelor offerings by higher education institutions. Increasingly these sectors are competing for the same market. One sector, being VET, is building their qualifications around skill standards developed by industry, the other, being self-accrediting, is putting something in the market that suits their situation.

Policy Recommendation

Establish a process to review the current status and funding of VET diplomas and advanced diplomas and implement a strategy to address the decline.

10.2 VET Student Loans

VET Student Loans (the replacement for the discredited VET FEE HELP program), in principle, provides students studying higher level VET the equivalent support to higher education HECS HELP program. In reality, the two programs are significantly different, with VET Student Loans limited by the qualifications that it covers and a three-tier cap on the amount that students can borrow. There is also a 25% loan premium paid by students except where states and territories have agreed to assume some of the debt responsibility.

After an extensive consultation process for the second review of the course list and caps, within which the industry participated in good faith over twelve months ago, the government failed to address the shortcomings in the caps and the program that are resulting in a significant reduction in the number of higher level VET qualifications being undertaken. The caps allocated to many of the key qualifications, such as enrolled nursing, are completely inadequate to deliver an unsubsidised quality course. This is resulting in good quality providers who are operating in those states where funding to private providers has ceased, to leave the market. This is not an acceptable outcome.

Policy Recommendation:

The Government should increase the caps on VET Student Loans where evidence demonstrates inadequacy in covering the cost of delivering quality courses that are meeting industry needs, and reinstate a regular and reliable review of the course and caps list to ensure VSL remains.

11 Quality

One of the major concerns with the sector over the last decade has been about the quality of delivery. With over 4,000 training providers, there is inevitably going to be differences in the quality of the experience. This is acceptable, even desirable, in a robust market, as long as all providers are meeting a minimum industry standard.

Despite an initial commitment at the commencement of this decade to achieve a single national regulator for VET, it is disappointing that Victoria and Western Australia have persisted in keeping their own regulator. This is a demonstration of federation 'clunkiness' at its best (or worst). In almost every area of policy, one or more State Governments can argue that their circumstances warrant something different. However, when a decision has been made to have one national regulator, all Governments should follow through. There needs to be a renewed commitment to make the one regulator work as efficiently and as effectively as possible.

Policy Recommendation

Maintain a strong focus on quality across the education and training system, through the professional development of teacher/trainer, strong institutions and effective and a sufficiently resourced national regulator.

12 About the Australian Chamber

The Australian Chamber of Commerce and Industry is the largest and most representative business advocacy network in Australia. We speak on behalf of Australian business at home and abroad.

Our membership comprises all state and territory chambers of commerce and dozens of national industry associations. Individual businesses are also able to be members of our Business Leaders Council.

We represent more than 300,000 businesses of all sizes, across all industries and all parts of the country, employing over 4 million Australian workers.

The Australian Chamber strives to make Australia the best place in the world to do business – so that Australians have the jobs, living standards and opportunities to which they aspire.

We seek to create an environment in which businesspeople, employees and independent contractors can achieve their potential as part of a dynamic private sector. We encourage entrepreneurship and innovation to achieve prosperity, economic growth and jobs.

We focus on issues that impact on business, including economics, trade, workplace relations, work health and safety, and employment, education and training.

We advocate for Australian business in public debate and to policy decision-makers, including ministers, shadow ministers, other members of parliament, ministerial policy advisors, public servants, regulators and other national agencies. We represent Australian business in international forums.

We represent the broad interests of the private sector rather than individual clients or a narrow sectional interest.

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