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Review of the Australian Apprenticeships National Skills Needs List

September 2019



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Chamber of Commerce
and Industry

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Table of Contents

1	Introduction	4
2	Role and importance of incentives	4
2.1	Rationale for incentives	4
2.2	Reflections on incentive structure	6
2.3	Certainty in base incentives is necessary	6
2.4	Effectiveness of Incentives	6
3	Role of the NSNL in apprenticeships	7
4	Single coherent approach to skills shortage analysis	8
4.1	National Skills Shortage Research Reports and Ratings Summary	9
4.2	Internet Vacancy Index	9
4.3	Skills Shortage Lists for Migration	10
4.4	Need for a Single Approach	11
5	Methodology for determining skills shortages	12
5.1	Forward Looking	12
5.2	ANZSCO	14
6	Conclusion	15
7	About the Australian Chamber	16

1 Introduction

The Australian Chamber of Commerce and Industry (Australian Chamber) welcomes the opportunity to make a submission in response to the issues paper on the Review of the Australian Apprenticeships National Skills Needs List (NSNL). Apprenticeship incentives play a critically important role in the system, and the purpose of incentives needs to be clearly understood. The NSNL review provides an opportunity for clarity and also to examine the relationship between skills shortages and apprenticeship incentives.

This submission establishes a clear position that an assessment of skills in shortage should have no role in influencing the base apprenticeship incentives, as there are other more purposeful rationales for public investment in base apprenticeship incentives. Skills shortage analysis does have a place in considering incentives, but its relevance should be confined to some additional or top-up incentives which are designed for a particular purpose.

A single coherent approach to skills shortage analysis is supported as part of improving the understanding of labour market needs and to support decisions taken in policy areas such as top up incentives and migration. In that context, it is recommended that the NSNL be incorporated into a single approach to skill shortage lists.

2 Role and importance of incentives

2.1 Rationale for incentives

Apprenticeship incentives play an important role in encouraging employers to consider a work integrated learning model to skills development. In the case where apprenticeships are the only pathway to an occupation, incentives help to ensure that there is a sustainable skills pipeline.

The issues paper (page 4) identifies two key rationales for government intervention in the form of apprenticeship incentives:

- Expand the available training pathways and/or employment opportunities for young people, disadvantaged groups and mature people needing to retrain; and
- Encourage participation in occupations that are in, or expected to be in, skills shortage particularly those that are a critical part of the supply chain for sectors of the economy.

Although there may be some useful discussion about the wording of these rationales, the intent is supported. In addition, we would add an even more important rationale, being:

- Encourage employers to enter into a work integrated learning, training and employment arrangement to develop skills with a high productivity value across the economy.

This third rationale is as true for occupations that require apprenticeship qualifications as the only pathway as it is for those that do not. In trades that require an apprenticeship pathway, those occupations and industries have long accepted that an apprenticeship model delivers the combination of structured, nationally-recognised training and work experience needed to produce highly productive workers. These benefits of an apprenticeship or traineeship are just as true for occupations that allow a variety of pathways to acquire the skills. Highly skilled, nationally

accredited workers are the result of putting in place the right conditions for employers to agree to take on an apprentice or trainee, and apprenticeship incentives play an important role in enhancing the business case for them to do so.

The economic and public-benefit arguments in support of this third rationale are very strong and include:

- Work integrated learning models deliver significant productivity benefits and are a proven model for high quality skills outcomes.
- Apprenticeships and traineeships have the highest graduate employment outcomes across all VET qualification options and most higher education qualification options. This delivers a long term economic dividend for both the community and the individual.
- Apprenticeships and traineeships offer suitable pathways for school to work transition, combining a continuation of structured learning alongside work experience within a model where the student receives remuneration, and the employer has access to pay rates that reflect the work/training nature of the employment relationship.
- Apprenticeships and traineeships deliver a nationally recognised qualification.
- There is no more efficient or effective model for combining structured training with work experience than an apprenticeship. The Joyce Review highlighted the importance of work experience in VET qualifications. This is in-built in apprenticeships. With institutional delivery of VET, the organisation of work experience usually adds to training delivery costs as well as often being difficult to find host businesses willing to offer the experience.

These economic benefits are the most important justification for public investment in apprenticeship incentives. Given that the current structure of apprenticeship incentives includes both base incentives and additional incentives, it follows that there are two rationales for the base incentive which need to be clearly recognised as being:

- an inducement for employers to expand the available training and employment pathways for particularly young people (as mentioned in the issues paper), and
- for employers to offer an apprenticeship or traineeship that delivers strong economic and public benefit through the delivery of quality skills within a work integrate learning model (as described above).

Therefore, there is no need to link the base incentive, which is currently set at \$1500 on commencement and \$2500 on completion, to any skills shortage analysis, as the purpose of the incentive does not relate to the skills shortages rationale for incentives. The rationale for the base incentive is sufficiently strong in its own right.

This clarity around the role of incentives is not well reflected in the issues paper which, although initially identifying the important pathway role for apprenticeships, proceeds to frame incentives only in relation to skill shortages.

Given that vocational training is a shared responsibility between the Commonwealth and the States, the Commonwealth's commitment to incentivise an apprenticeship contract is very relevant given that it is an employment as well as a skills outcome. Apprenticeships are also highly relevant to the Commonwealth's long standing policy and funding interest in the economic outcomes for

individuals on leaving school by encouraging a successful transition from school to work, as well as the productivity and economic dividend that comes from skills developed of high value.

2.2 Reflections on incentive structure

Although the NSNL review does not seek comment on the structure of the incentives, we take the opportunity to welcome the reinstatement next year of incentives for part time and diploma level traineeships.

In relation to existing workers, we signal our intention to recommend in our pre-budget submission that the base incentive for non-trade apprenticeships (i.e. traineeships not on the priority list of four occupations) for existing workers be reinstated in circumstances where the existing worker has been a casual, working on average less than 20 hours per week whilst at school and is offered a full time traineeship on leaving school. This would encourage employers to offer full time traineeships to employees who have been working weekend or evening casual shifts in industries such as retail and hospitality. This would be a highly valuable conversion and ensure that these workers can take their initial workplace experience and convert it to a career in that industry.

2.3 Certainty in base incentives is necessary

One of the questions raised in the issues paper (page 16) is whether volatility of incentives would impede their uptake. The short answer is yes, but the question needs to be reframed to distinguish between the base incentive and additional incentives. Base incentives should not constantly fluctuate – they need to provide consistency and certainty. Top ups such as additional incentives can be short term or adjusted based on identified need provided that if it is based around skills shortages then the methodology has to be sound and consistent.

Additional incentives provide the opportunity for a more targeted approach, including support in areas of significant skill shortage, or in the case of disadvantaged groups and adult apprentices.

2.4 Effectiveness of Incentives

We note that an assessment of the effectiveness of incentives in achieving behavioural change in employers is beyond the scope of this review. However, it is important to make the comment that for those people that believe that incentives are not effective in being able to induce an employer to employ an apprentice when they otherwise would not have, then it is not clear why applying an incentive only to an occupation in shortage will make a difference to their view, or indeed why they would think this would assist in helping to address skill shortages.

Of course, it is our view that incentives are effective. The base incentive is all about improving the business case for entering into a training/employment contract. Additional incentives further improve the business case and hopefully induce even more employers to take on an apprentice. If incentives are removed from occupations deemed not to be in shortage, the apprenticeship system will be decimated and the economies of scale in having an “apprenticeship system” will be reduced

so substantially that even those occupations where incentives may still apply will be negatively impacted by the reduction in the overall system.

3 Role of the NSNL in apprenticeships

As a matter of clear principle, the need of the employer for a particular skill is demonstrated by the commitment to take on the apprentice/trainee. A skill need is local; a skill shortage as generally understood is not.

No national skill shortage analysis is sufficiently sophisticated to determine the need that an individual employer has at a particular point in time in a particular location for a worker who they are willing to train to become skilled. Skill needs exist across all industries and are not confined to trades.

The fact that the NSNL has not been updated for many years reflects that its role as (basically) a list of trade apprenticeships has been uncontroversial. It could have usefully been updated to include more recent trade apprenticeships.

The NSNL's impact on the base apprenticeship incentive at present is confined to allowing existing workers in NSNL occupation to be eligible for employer incentives. The impact of the NSNL is greater in additional incentives where it affects eligibility for programs such as trade support loans and adult apprentice incentives.

There is a strong argument that the existing function of the NSNL in relation to apprenticeship incentives would be better dealt with by using the term trade apprenticeships rather than reference to the NSNL [ie. NSNL = trade apprenticeships]. A consequence of this would be that additional incentives such as for adult apprentices and trade support loans would apply to all trades, including those that have been recognised since the NSNL was last updated. According to the issues paper there are around 15% of trade apprenticeships that are not on the current NSNL. We would envisage this would be a percentage of qualifications not covered rather than apprentice numbers so the expansion of incentive coverage would be relatively modest. The current NSNL includes the vast majority of high volume trade apprenticeships.

There is a logic in relating the additional incentives that are impacted by the operation of the NSNL [such as access to trade support loans and extra support for adult apprentices] to trade apprenticeship, not because they are more valuable, or more in "need", but because they are longer and the commitment to be made by employers in taking on a trade apprenticeship is more costly over the period of the qualification. In the case of trade support loans, the apprentice stays on apprenticeship wage rates for longer, so again there is some logic in the direct linkage to trade apprenticeships. If the NSNL became a different list – a mixture of trades and non-trades for example – then this relationship would not follow as logically in relation to the existing additional incentives. In all cases, incentives play a role in improving the business case, and when additional incentives are applied, they are targeted to address particular shortfalls in the business case, or particular needs. Skills shortages is only one such need.

The proposition of using trades apprenticeships as the substitute for the current role that the NSNL plays does not imply there is no role for skills shortage analysis in apprenticeship incentives, but

we see that role confined to the additional incentives used to target particular areas of need. Further comments on the methodology for skills shortage analysis and lists is explored below.

A further benefit of replacing the current role of the NSNL with the simpler language of trade apprenticeships is that it is well understood and will reduce the complexity of lists. The change would also be dynamic, meaning that it will reflect decisions taken from time to time to add or remove trade qualifications from the system, rather than a static list that would need to be updated.

A potential disadvantage of the replacement of the NSNL in its current role would arise in situations where other jurisdictions are using the list for their own apprenticeship measures. We have been made aware that in Victoria the list is directly linked to state funding so these linkages would need to be taken into account in any final position on the NSNL. This may in the short term be dealt with by using both terms as equivalents, ie. NSNL = trade apprenticeships. In the longer term, it would be more efficient in the term NSNL was replaced by trade apprenticeships wherever it appears.

In summary, we would be very concerned at expanding the role of the NSNL to impact base incentives by relying on skills shortage analysis. Such an expansion would provide a potential vehicle for further cuts in incentives based on only one of the rationales for incentives (skills shortages) rather than taking into account other rationales. That said, there is a need to improve our approach to skills shortage analysis and for it be applied to relevant decisions taken on additional incentives. This approach will be explored in the sections below.

Finally for completeness we note that the AAIP four priority occupations – aged, child and disability care and nursing is untouched by any recommendations we have made in relation to the NSNL which is in line with the comment in the issues paper that it is out of scope.

4 Single coherent approach to skills shortage analysis

Skills shortage refers to a labour market condition in which demand for a particular skill exceeds its supply at the prevailing market wage rate¹. There a number of methods to assess skills shortages and the Department in its various branches has employed a combination of different methodologies to compile various skills shortages lists and research. A single coherent approach to the identification of occupational skills shortages is strongly supported (design principle one). The Australian Chamber has advocated the need for better workforce planning and labour market analysis to the various branches within the Department. This review of NSNL is an opportunity to consolidate these different methodologies and approaches within the new portfolio of the Department of Employment and Skills. The labour market research functions listed below are all undertaken by the Department, but in different silos.

¹ OECD 2018, Getting Skills Right: Australia

4.1 National Skills Shortage Research Reports and Ratings Summary

A common method to assess skill shortages is to survey employers about their hiring difficulties, as done by the Department in the Survey of Employers' Recruitment Experiences (SERA)². This exercise produces the ratings summary and national skills shortages reports for occupations³.

A key element of the skill shortage research is the SERA. The SERA collects two kinds of information about employers' experiences recruiting skilled workers.

- The first is qualitative information from discussions with employers and recruitment professionals, which enables the identification of key labour market issues for each occupation.
- The second is quantifiable data about employers' recruitment experiences, including the proportion of vacancies filled and the number of applicants, qualified applicants and suitable applicants. This provides the basis for historical comparisons and analysis across states/territories and occupations⁴.

The research focuses on relatively large occupations (national employment of at least 1500 as at the 2011 Census) which are skilled (generally require at least three years of post-school education and training). Most are professions (ANZSCO Major Group 2) and technicians and trades (ANZSCO Major Group 3), although a small number of other occupations are also included. The research comprises of around 80 occupations which have been assessed annually in recent years⁵.

Therefore, this summary is not a comprehensive skills shortage report of all the skilled occupations in the economy and is also subjective to the questions phrased and the number of employers surveyed across the market.

4.2 Internet Vacancy Index

The Department publishes monthly job vacancy reports and the Internet Vacancy Index on its Labour Market Information Portal (LMIP). The Internet Vacancy Index is based on a count of online job advertisements newly lodged on SEEK, CareerOne and Australian JobSearch during the month.

Long vacancy periods may signal a skills shortage or that there are hiring difficulties⁶. This method is also not representative of the entire labour market due to other job advertisements platforms such as LinkedIn, word of mouth, employer job boards and websites not being included.

² Department of Employment, Skills, Small and Family Business 2019, Skills Shortages Research Methodology, <https://docs.employment.gov.au/system/files/doc/other/ss_methodology_0.pdf>.

³ Department of Employment, Skills, Small and Family Business 2018, Ratings Summary – Labour Market Analysis of Skilled Occupations, <<https://docs.employment.gov.au/system/files/doc/other/ratingssummary.pdf>>.

⁴ Department of Employment, Skills, Small and Family Business 2019, Skills Shortages Research Methodology, <https://docs.employment.gov.au/system/files/doc/other/ss_methodology_0.pdf>.

⁵ Department of Employment, Skills, Small and Family Business 2019, Skills Shortages Research Methodology, <https://docs.employment.gov.au/system/files/doc/other/ss_methodology_0.pdf>.

⁶ OECD 2018, Getting Skills Right: Australia

4.3 Skills Shortage Lists for Migration

The Department also assesses skills shortages in the economy to inform Australia's migration system. This exercise uses a different methodology to assess occupations/skills in shortage in the economy and determines the three skills shortages lists – the Short Term Skilled Occupation List (STSOL), the Medium and Long-term Strategic Skills List (MLTSSL) and the Regional Occupations List (ROL)⁷.

For the Migration lists, the below datasets used in the current methodology are classified into primary and secondary factors, with a points system applied to the factors⁸:

- Skilled Migrant Employment Outcomes—Department of Home Affairs' Continuous Survey of Australia's Migrants
- Reliance on Temporary Visa Holders—Australian Bureau of Statistics (ABS) Census, Department of Employment Occupation Trend Data, Home Affairs Visa Grant and Visa Stock Data
- Graduate Outcomes—Graduate Careers Australia: Graduate Outcomes Data and Field of Education Occupation Destination data
- Apprenticeship Outcomes—VOCSTATS on the number of apprentice and trainee completions in each occupation (indicator of labour supply)
- Skill Level versus Education Attainment—ABS Survey of Education and Work: Educational Attainment by Occupation data
- Employment Growth Projections—Department of Employment Occupational Projections: Five Years to May 2022 (based on ABS data)
- Vacancies—Department of Employment Internet Vacancies Index for occupations by skill level, as well for all states/territories.
- Australian (National) Skill Shortages—Department of Employment: Skill Shortage Analysis
- ANZSCO Not Elsewhere Classified occupations—ABS Census, Department of Employment Occupation Trend Data
- Age Profile—ABS Labour Force Survey: Employed Persons Median Age by Occupation, and Home Affairs Subclass 457 Visa Grant Data
- Salary—ABS salary data and Subclass 457 Visa Grant Base Nominated Salary Data (not published).

This methodology allows for new evidence to be incorporated into the analysis through regular stakeholder and industry consultations. It also takes into account a wider range of data, including the ones discussed under 4.1 and 4.2 to arrive at a list of skills shortages.

It reflects a dysfunctional loop when some of the same datasets are used but different skills shortages lists produced, due to differing methodologies.

⁷ Department of Employment, Skills, Small and Family Business 2019, Migration Occupation Lists – Update and Methodology, <https://docs.employment.gov.au/system/files/doc/other/1710_methodology_approach_final.pdf>.

⁸ *ibid*

4.4 Need for a Single Approach

The Australian Chamber recommends the consolidation of labour market analysis and the determination of skills shortages on a single consistent basis across the Department. The National Skills Commission, a major recommendation of the Joyce VET Review and an early reform adopted by the Federal Government in the 2019-20 Federal Budget is given responsibility for this function. However, in the context of the NSNL Review, it is important to highlight that before the National Skills Commission is fully operational, any decisions made regarding labour market analysis and skills shortages needs to follow some basic principles.

The Australian Chamber recommends:

- A single robust evidence based methodology to determine skills shortages across the economy. This methodology for skills shortages should underpin all decisions made regarding workforce planning such as migration and additional support in the form of incentives. It could culminate into a single skills shortage list (in detail below) eliminating the need for multiple lists that need to be reviewed periodically and could be undertaken by the National Skills Commission.
- Extensive industry consultation through leveraging available industry insights and surveys to ensure the research results and skills shortage lists accurately reflect the prevailing labour market.
- Consolidation of industry consultation and collection of industry evidence including submissions, forums, one to one meetings.
- There are other labour market research activities undertaken by the Department that will benefit from consistency and rationalisation of methodology such as the publication of Job Outlook and careers information on the Department's website.

Single Skills Shortage List: Based on a consistent, robust, evidence based methodology, the Australian Chamber recommends a single skills shortage list that could be known as the **Consolidated Skills Shortages List**. This list will replace the various skills shortages lists and include all of the occupations that are currently sitting on the various lists such as the SERA list, MLTSSL, STSOL and the NSNL. This newly created list can underpin the migration system as well as the additional top-up incentives and any other labour market workforce planning activities. This will reduce the complexity of the various lists and the resources needed to maintain and review the lists on a periodic basis.

In viewing skills shortages for the purposes of permanent migration, a separate list that looks at **significant skills shortages** (reminiscent of the MLTSSL and a subset of the Consolidated Skills Shortages List) can underpin independent skilled migration since there needs to be evidence that an independent migrant who arrives in Australia is able to secure a job in the prevailing market conditions. Employer Sponsored Migration should be underpinned by the Consolidated Skills Shortages List since there is a guaranteed job waiting for the migrant based on the employer's need of labour and skills. In addition, the willingness of the employer to go through the significant regulatory barriers and substantial cost is sufficient to demonstrate that they are in need of that skilled worker and hence do not need an underpinning skills shortages list to determine the occupation's eligibility. For the purposes of temporary migration, a short term skills list could exist but with a pathway to permanency.

5 Methodology for determining skills shortages

In relation to the proposed six design principles for determining skills shortages, subject to the comments below, we have no major concerns with principles 1 through 5.

Design principle 6 does not belong in the methodology for identifying potential skill shortages as it relates more to how the skills shortage information is used and to much broader areas of public policy. As a principle that relates to the investment of public money, a criteria of delivering the greatest social and economic benefit is a sound one. As we have demonstrated in the comments above, the rationale for public investment in apprenticeship incentives is strong without reference to an assessment of skills shortage.

Key underpinnings in any skills shortage research are the accuracy of the forecasts and labour market classifications. We will make detailed representations on both aspects at the methodology discussion paper stage in the next round of submissions and consultations, but felt it was appropriate to flag these issues at this early stage.

5.1 Forward Looking

The Australian Chamber supports a forward-looking skills shortage methodology (design principle 2) but cautions that forecasts are not always accurate. The Department of Employment, Skills, Small and Family Business produces employment projections by industry, occupation, skill level and region for the following five-year period. These employment projections are designed to provide a guide to the future direction of the labour market. However, like all such exercises, they are subject to an inherent degree of uncertainty⁹.

An analysis by the Australian Chamber comparing actual labour market employment outcomes to these forecasts published in Australian Jobs highlight the usefulness and limitations of labour forecasts and projections¹⁰. The analysis evaluates the accuracy of the predictions made in 2013 for five years' time, against actual employment in 2018.

As seen in figure 1, the industries where the predictions were well under the actual included have been in Health Care and Social Assistance, Professional, Scientific and Technical Services and Construction and Accommodation and Food Services. The forecast for the size of growth in these industries was not accurate. Other industries that experienced relatively significant growth that was not anticipated were: Information Media and Telecommunications; Manufacturing; Public Admin and Safety and Transport and Postal and Warehousing. On the other hand, two industries that did not grow as predicted were Retail Trade and Wholesale Trade.

⁹ Labour Market Information Portal 2019, 2018 Employment Projections – for the five years to May 2023, <<http://lmip.gov.au/default.aspx?LMIP/GainInsights/EmploymentProjections>>.

¹⁰ Department of Employment, Skills, Small and Family Business 2019, Australian Jobs 2019, <<https://docs.employment.gov.au/system/files/doc/other/australianjobs2019.pdf>>.

Figure 1: Project Employment Outcomes versus Actual Employment Outcomes by Industry ('000)¹¹

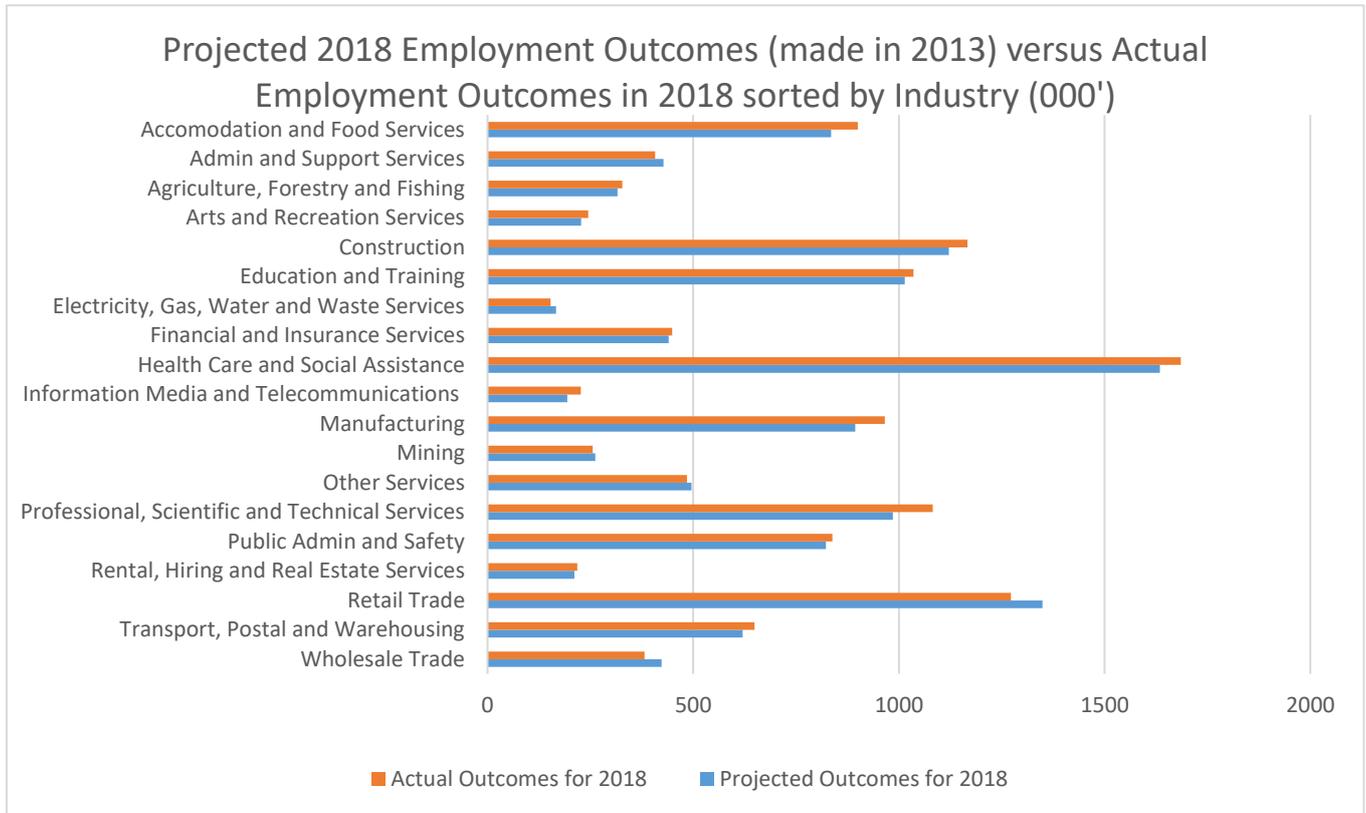
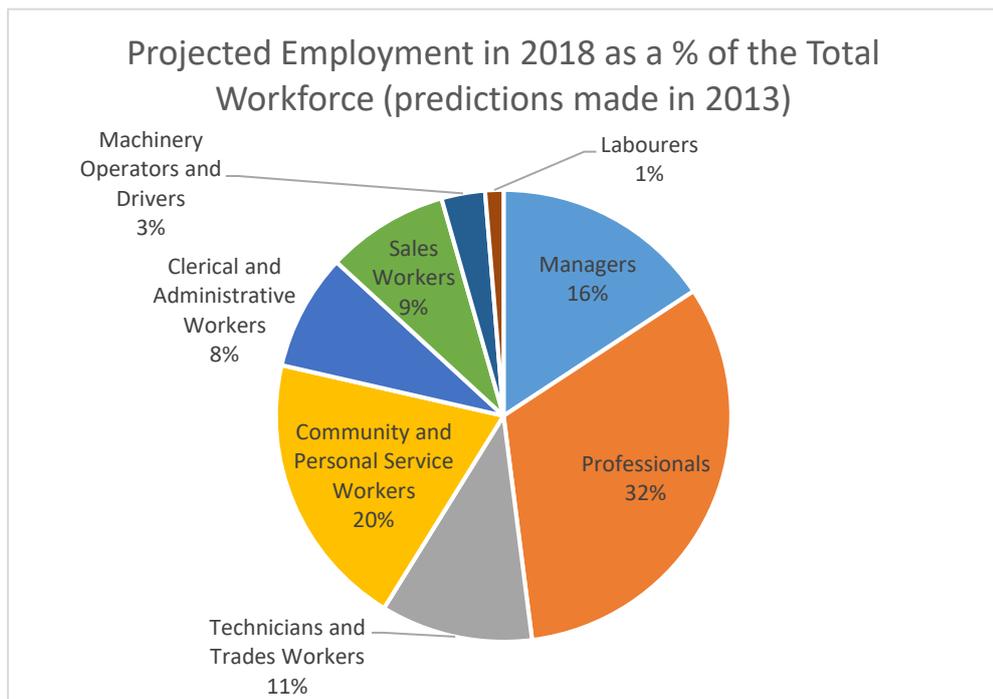


Figure 2: Projected Employment in 2018 as a % of the Total Workforce – predictions made in 2013



¹¹ Data sourced from aggregate employment numbers ('000') Australian Jobs 2014 and 2019

Figure 3: Actual Employment in 2018 as a % of the Total Workforce

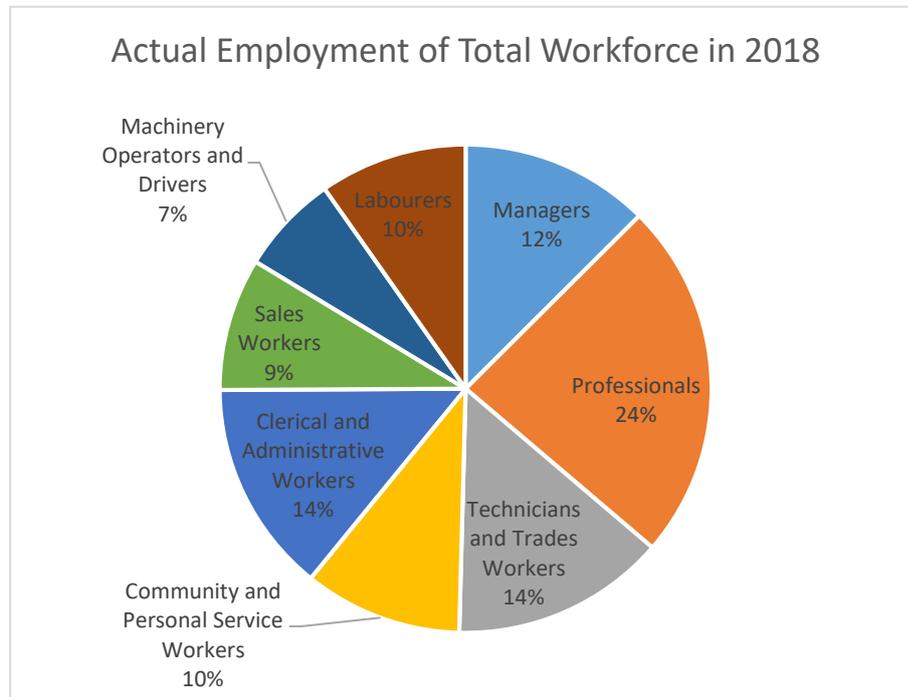


Figure 2 reflects the projected/forecasted proportion of employment in 2018 by ANZSCO's eight major occupation groups, with figure 3 reflecting the actual proportion of employment in 2018. The 2013 5-year forecasts significantly overestimated the proportion of Professionals; Community and Personal Service Workers and Managers in the total workforce. Meanwhile the forecasts, significantly underestimated the proportion of Labourers; Clerical and Administrative Workers and Machinery Operators and Drivers in the total workforce. For the remaining two occupation groups (Technicians and Trade Workers and Sales Workers), forecasts mirror the actual employment outcomes. It is likely that the speed of the transition towards highly skilled jobs such as Professionals or Managers was overestimated while the stability and size of lower skilled occupations such as Labourers or Machinery Operators and Drivers was underestimated in the forecasts.

This analysis highlights that overly relying on projections, forecasts and modelling to identify skills shortages or needs in economy is not without errors. It is an important exercise that must be undertaken but caution is needed in relying on forecasts to direct funding in ways that may be counterproductive to actual outcomes. This unpredictability reinforces the main argument of this submission that skills shortages should not be the sole determinant of apprenticeship incentives. Skill needs, even skill shortages, can occur in any skilled occupation at any time in any location. A national analysis of skills shortages is important – but it has its limitations.

5.2 ANZSCO

No discussion on labour market analysis should be complete without, yet again, expressing concern about the need to urgently commence a review of Australian and New Zealand Standard Classification of Occupations (ANZSCO). Although the ANZSCO is outside the scope of this round

of submissions, the Australian Chamber takes the opportunity to highlight its importance in the context of workforce planning and will make detailed representations and recommendations at the methodology discussion stage.

One of the pillars of labour market statistical infrastructure is ANZSCO. This infrastructure maintained by the Australian Bureau of Statistics (ABS) includes information from the Census and underpins a wide range of labour market data such as job outlook information and occupation lists that determine migration eligibility.

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 and revised twice (2009 and 2013) since its introduction in 2006 (having transitioned from the previous ASCO codes). Canada, which has a similar classification of occupations, has had regular revisions with a structural review scheduled every ten years (2001, 2006, 2011, and 2016). A major review of ANZSCO is long overdue. Occupations in ANZSCO are out of date in that skill levels are not reflective of the current work performed and for many industries it is woefully inadequate in assessing the skill needs in the context of new occupations. 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. An immediate review of ANZSCO is needed in the context of workforce planning.

6 Conclusion

The policy and fiscal rationale for the base apprenticeship incentive is the economic and public benefit of improving the business case for an employer to take on an apprentice or trainee in a highly productive, work integrated learning training/employment contract. In relation to the current role that the NSNL plays in incentives, it should be seen as equivalent to the term trade apprenticeships (ie. NSNL = trade apprenticeships), and these terms should be substituted once there are no consequences arising from NSNL being used in other situations.

Skill needs exist across the economy, and government policy needs to reflect that growth and skills gaps can occur across a range of industries. It is also important that policy design reflects that a skill need can be localised to a region, or even a particular employer.

That said, skills shortage analysis is a valuable undertaking for a range of purposes, and is specifically relevant to apprenticeship incentives due to the need, at times, to target additional incentives. A single approach to the analysis of skills shortages within the Department is strongly supported, and the Australian Chamber looks forward to discussing methodology to most effectively undertake this analysis during the course of this review.

7 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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