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Women in Adult and Vocational Education (WAVE)

BUILDING AN ADAPTABLE WORKFORCE THAT WORKS FOR EVERYONE



A submission to the Productivity Commission in
Response to the release of the Interim Report "Building a
skilled and adaptable workforce"

Acknowledgement

Women in Vocational and Adult Education (WAVE) acknowledge the traditional owners of our lands and waters – the Aboriginal and Torres Strait Islander Peoples – who are the first educators and the first teachers of this land.

We pay our respects to elders, past present and emerging and recognise that these lands and waters have never been ceded.

We support truth, treaty and reconciliation and the Uluru Statement of the Heart.

Always was, always will be Aboriginal land.

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WHO IS WAVE?

WAVE is a national network of women involved in Vocational Education and Training (VET) and adult education. WAVE provides research, policy advice and advocacy to Australian and State/Territory Governments on gender equity in skills and adult education policy and provides input into T/VET and adult education regionally and internationally. We are supported within each state by local representatives who, in turn, contribute collaboratively to national events and governance. Formed in 1985 WAVE is the first and only national independent, non-government organisation for Australian women and girls in the adult, community and vocational education and training sector/s.

Our mission is to advocate so that Australia's vocational education and training and adult education systems are equitable for all women and girls. Our vision is for a future where women and girls in all their diversity can participate fully in all aspects of work and democratic society, through equitable and transformative vocational and adult education.

Our Way of Working

WAVE undertakes its work within a feminist framework recognising that intersecting forms of discrimination and marginalisation can impact a person's capacity to access and benefit from Australia's vocational and adult education system/s. As such, WAVE is keenly aware of the importance of centring lived experience in our work. We advocate for the vocational and adult education system to enhance its inclusivity, relevance and affordability for those who may be left behind to provide a coherent voice for under-represented, vulnerable and marginalised groups.

The transformative power of inclusive education, training and lifelong learning that centre gender equity is at the core of WAVE's values.

As leaders in the areas of gender equity and vocational and adult education, WAVE is uniquely placed to provide expert advice to Australian and State/Territory Governments on ways that these systems can be equitable for all Australians. We can provide partners, members and stakeholders with deep understanding of the last 40 years of evidence in VET and adult education and gender equity from Theory of Change to Theory of Action and monitoring and evaluation of results.

We work in collaboration and in partnership with organisations, leaders and communities that share an appreciation of the breadth of challenges associated with gender inequity, especially as they relate to Australia's national adult education and skills system/s.

WAVE's mission is to partner with organisations and individuals with a shared commitment to social justice in the co-production of sound research and advocacy to benefit both Australia's adult, vocational education and skills training system and especially those who learn and work in it.

OUR RESPONSE TO THE INTERIM REPORT

Summary of our Position

Women in Adult and Vocational Education (WAVE) welcomes the Productivity Commission's focus on building a skilled and adaptable workforce as essential to Australia's future prosperity. The Commission's recognition that workers will need to change occupations multiple times and continuously upskill reflects the reality many Australians already face—particularly women, who have long demonstrated remarkable adaptability in navigating career breaks, caring responsibilities, and workforce re-entry.

However, WAVE's submission argues that Australia faces a "skills valuation crisis" rather than simply a skills shortage—where the sophisticated capabilities (competencies, skills) women develop through unpaid care work, community leadership, and life experience remain invisible to our formal education and training systems.

WAVE supports the progress towards harmonisation of the post-school education and training sectors including the emphasis on equity. We argue that for this to be successful, consultative clarification is required to harmonise the sectors' differing understandings of and approaches to 'equity' *per se* inclusive of legislated gender equality requirements along with the establishment of national oversight capacity. Further, and noting the lack of attention directed to the Adult & Community Education (ACE) sector, a formal national Lifelong Learning (LLL) policy framework is a prerequisite for harmonisation.

While supporting the Commission's goals, WAVE contends that productivity fit for purpose in C21 requires an intersectional feminist lens that recognises how current systems systematically undervalue feminised skills, create financial barriers that disproportionately burden women, and perpetuate exclusionary training cultures designed around "young male school leavers."

The submission calls for transformative reforms including publicly funded Recognition of Prior Learning processes that actively value unpaid work, apprenticeship systems redesigned for diversity, and occupational entry regulations reviewed through a gender-transformative framework—arguing that Australia's economic future depends not on asking individuals to constantly adapt to outmoded structures and unchanging systems, but on creating inclusive workforce development that recognises and develops the full spectrum of human potential across all communities.

CELEBRATING STRENGTHS WHILE ADDRESSING GAPS

The Productivity Commission's recommendations for national coordination of educational resources, improved credit transfer systems, and streamlined occupational entry regulations represent important steps towards removing barriers that limit human potential. We particularly applaud the Commission's acknowledgement that apprenticeships have been "designed around the needs of young male school leavers" and their call for alternative pathways.

However, true workforce adaptability requires us to look beyond productivity metrics to understand whose voices are heard—and whose are missing—in shaping Australia's skills future.

KEY CONCEPTUAL FRAMEWORK: AUSTRALIA'S SKILLS VALUATION CRISIS

What we're experiencing isn't simply a "skills shortage"—it's a **skills valuation crisis**. Every day, women demonstrate complex problem-solving abilities while caring for ageing parents, navigate cross-cultural communication in community roles, and manage household budgets with precision that would impress any financial analyst. Yet these sophisticated skills, often acquired through life experience and unpaid work, remain invisible to our formal education and training systems.

Consider a refugee mother who managed supply chains in her home country but now works part-time in aged care while supporting her family's integration into Australian life. Or think about a single mother who coordinates complex schedules for three children while studying online, demonstrating project management skills that many employers would value—if they could see them. Then there's the young graduate with a social work degree and substantial HELP debt, eager to make a difference in community services but unable to secure that crucial first role because employers demand experience she can't get without someone giving her a chance.

The Intersectional Feminist Lens

For Australia's productivity agenda to be effective, particularly in building a skilled and adaptable workforce, it must be viewed through an **intersectional feminist lens**. The current framework is fundamentally limited by its narrow focus on the "paid economy," which ignores the essential unpaid care and reproductive work that underpins our entire economic system. This failure to value the immense contribution of women's unpaid labour perpetuates a systemic devaluation of the very skills developed within this sphere, including complex competencies in caregiving, interpersonal communication, and community engagement.

This initial undervaluation creates profound barriers to women's learning and skills development. These barriers are then compounded by intersecting characteristics such

as race, migration status, and class, creating formidable and often invisible obstacles for marginalised women.

Therefore, true national productivity will remain unrealised until the agenda seeks to be genuinely inclusive. It must move beyond its current framework to explicitly name the value of feminised and unpaid work, understand the structural and intersecting barriers that prevent women and marginalised communities from equitable participation, and transform our systems to recognise the full spectrum of human capabilities. Until our definition of productivity confronts these inequities, the agenda risks institutionalising the very disadvantages it should be dismantling, leaving Australia's greatest source of potential—its people—untapped.

The Missing Economy: Unpaid Care Work

A fundamental flaw in Australia's current approach to skills and productivity is the systemic invisibility of the single largest contributor to our national wellbeing: the **unpaid care work** predominantly performed by women. Any national system of credit and recognition that does not proactively address this blind spot will fail to be equitable and will fall short of its productivity goals. This is the very essence of the "skills valuation crisis".

The skills developed through unpaid work—caring for children and ageing parents, managing complex household budgets, and coordinating community activities—are not innate "natural attributes"; they are sophisticated, hard-won competencies. These include:

- **Complex project management:** Juggling competing schedules, deadlines, and the needs of multiple dependents
- **Financial administration:** Managing household budgets with a precision that rivals formal financial roles
- **Logistical coordination and negotiation:** Skills that are highly valued in the formal workplace but unrecognised when performed in the home
- **Conflict resolution and interpersonal communication:** Essential skills for navigating family and community dynamics

This work is not a separate, private activity; it is the foundational platform upon which the formal economy is built. Yet, these skills remain uncredited and systemically undervalued. Recognising the impact of unpaid care work is not just a matter of social justice; it is a critical economic strategy to unlock the full human capital of our nation.

Crucially, we must understand that skill is both developed and applied in workplace settings—that skill and knowledge acquire value in our society primarily through paid work. Yet the persistent pay gap reveals that not all skills are valued equally in Australia. This inequality doesn't just harm individuals; it undermines our collective productivity, wellbeing, and health across generations. When we systematically undervalue the

complex skills required in caring, education, and community work, we create economic inefficiencies that ripple through families and communities, affecting everything from workforce participation to intergenerational mobility.

THREE FUNDAMENTAL EQUITY CHALLENGES

Our analysis reveals that building an adaptable workforce requires addressing three fundamental equity challenges:

1. The Training Divide

Research shows a stark gender divide in workplace and work-related learning opportunities. Male-dominated sectors typically provide "enabling learning environments" with sufficient resources and formal training support, while female-dominated sectors often operate under "constraining conditions" with limited resources and skills viewed as "natural talent" rather than acquired expertise requiring investment.

This divide manifests in multiple ways:

- Apprenticeships and government-subsidised training are concentrated in male-dominated industries
- Women in feminised sectors often have to fund their own professional development
- Workplace cultures in male-dominated fields may provide informal mentoring and learning opportunities not available to women
- Training schedules and formats often assume availability that doesn't account for caring responsibilities

2. The Qualification Burden

Women carry disproportionate financial costs for their education, accumulating significant HELP debt in essential feminised professions like nursing and teaching, while male-dominated trades often benefit from employer-funded training and government subsidies. This creates an "invisible tax" on women entering the workforce.

The financial burden extends beyond course fees to include:

- Living costs during unpaid placements required in many feminised professions
- Childcare costs during training periods
- Lost income from reduced working hours during study
- Higher interest accumulation on HELP debts due to lower starting salaries in feminised sectors

3. The Recognition Gap

Skilled migrants, particularly women from non-Western backgrounds, face compounding barriers when their qualifications and experience aren't recognised. This represents not just individual hardship, but a massive waste of human capital that Australia can't afford.

The recognition gap is particularly acute for women because:

- Their qualifications may be from countries whose educational systems are less familiar to Australian assessors
- They may have career gaps due to family responsibilities that complicate assessment
- Language barriers may prevent them from effectively demonstrating their competencies
- Cultural differences in professional practice may not be understood or valued

UNDERSTANDING SYSTEMIC BARRIERS BEYOND REGULATION

While reforming occupational entry regulations is a necessary step, WAVE must stress that for many women and those facing compounding forms of discrimination, the most formidable barriers to entry are not formal rules, but the systemic norms, attitudes, and behaviours embedded within our education and training systems. A focus on licensing alone overlooks the lived reality that determines whether a person can even begin, let alone complete, a qualification.

True access is dictated by a range of systemic factors that the current productivity agenda does not sufficiently address:

The Financial Burden of Learning

Women already carry a disproportionate financial cost for their education, accumulating significant HELP debt in essential feminised professions. They often have to bear a higher percentage of their own training costs, being less represented in government-subsidised training like apprenticeships. The high cost and long duration of many courses act as a powerful deterrent.

Exclusionary Training Cultures and Structures

Many training pathways, particularly apprenticeships, remain "designed around the needs of young male school leavers". This structure perpetuates discrimination against women, where gendered assumptions about capability determine access to high-value training opportunities. This experience occurs across our workforce, but is compounded in male-dominated fields and is marked by hostile attitudes, workplace

gendered violence, and discrimination, which severely impact retention and completion rates.

The Unaccommodating Nature of Care

The education and training system consistently fails to recognise and respond to women's caring responsibilities. Inflexible training schedules that don't accommodate these commitments, and a persistent lack of adequate and affordable childcare, remain significant structural barriers that lock women out of opportunities for skills development.

Addressing these systemic issues is not peripheral to the productivity agenda; it is central to it. A genuinely adaptable and productive workforce cannot be built by simply adjusting formal regulations while leaving in place the cultural and structural barriers that prevent half the population from fully participating. Real reform requires a commitment to transforming training cultures, sharing the costs of skills development fairly, and designing a learning system that adapts to the lives of women, rather than demanding women adapt to an exclusionary system.

A PATHWAY FORWARD: EQUITY AS ECONOMIC SMART POLICY

Creating an adaptable workforce that truly serves everyone requires **three key shifts**:

1. Recognise All Forms of Skill

We must expand how we define and value 'competence', creating accessible pathways for recognising skills gained through caring work, community leadership, and international experience. This isn't about lowering standards—it's about seeing the full spectrum of human capability.

Crucially, we must understand that skill is both developed and applied in workplace settings—that skill and knowledge acquire value in our society primarily through paid work. Yet the persistent pay gap reveals that not all skills are valued equally in Australia. This inequality doesn't just harm individuals; it undermines our collective productivity, wellbeing, and health across generations. When we systematically undervalue the complex skills required in caring, education, and community work, we create economic inefficiencies that ripple through families and communities, affecting everything from workforce participation to intergenerational mobility.

2. Transform Training Cultures

Workplace learning must become genuinely inclusive. This means ensuring that apprenticeships welcome diverse cohorts, that small businesses in feminised sectors receive targeted support for staff development, and that casual workers aren't excluded from training opportunities. It also means listening to the evidence and lived experience of students, and in particular, students facing discrimination and compounding

barriers, acknowledging that our education and training system itself puts in place barriers to equitable learning and credentialing.

3. Share the Costs Fairly

The financial burden of building skills shouldn't fall disproportionately on women and marginalised communities. We need funding models that recognise the economic value of essential feminised professions and ensure equal access to quality training regardless of background.

BEYOND INDIVIDUAL ADAPTATION: COLLECTIVE RESPONSIBILITY

True workforce adaptability isn't about asking individuals to constantly reshape themselves to meet market demands. It's about creating systems that recognise and develop the diverse talents all Australians bring. When we invest in understanding and removing barriers—whether they're inflexible training schedules that don't accommodate caring responsibilities, workplace cultures that don't welcome diversity, or assessment systems that don't recognise different ways of learning—we unlock potential that benefits everyone.

This is smart economic policy. Research consistently shows that diverse, inclusive workplaces are more innovative, productive, and resilient. Countries that effectively leverage their full human capital consistently outperform those that don't.

WAVE'S RESPONSES TO DRAFT RECOMMENDATIONS

Response to Draft Recommendation 1.1: National Platform for Lesson Planning Materials

WAVE offers **conditional support** for Draft Recommendation 1.1, which proposes a "single national platform for all teachers to access lesson planning materials". We commend the Commission for identifying the core challenges of stagnating student outcomes, the significant time teachers spend creating curriculum materials, and the need to support teachers in managing classrooms with a wide range of student abilities.

We also point out that the interim draft report is silent about VET in schools programs and projects, including school based apprenticeships. Attention must also be directed to access to quality future oriented inclusive gender-informed career advice for all students.

However, while the report acknowledges that materials should be "editable and adaptable to local contexts" and that quality frameworks could evaluate "cultural appropriateness", the recommendation itself lacks the specific, resourced mechanisms to guarantee this. Without a dedicated focus on intersectionality and adaptation, the platform risks becoming a tool of standardisation that inadvertently creates more barriers for the very students it seeks to help.

To ensure this platform becomes a tool for equity, WAVE proposes the following amended recommendation:

Amended Draft Recommendation 1.1: Invest in a National Platform for Equitable Learning and Skills Recognition

The Australian Government should invest in a single online national platform that houses a comprehensive bank of high-quality, curriculum-aligned lesson planning materials. To ensure this platform actively dismantles barriers:

1. **Fund Dedicated Resources for Adaptation and Intersectionality:** The platform's funding must include a specific allocation for a team whose purpose is to develop guidance on adapting core materials to address intersecting barriers based on gender, disability, cultural identity, and socio-economic status. This moves beyond simply making materials "editable" and gives teachers the tools to perform this vital work.
2. **Embed Intersectional Analysis in the Quality Framework:** The proposed "national framework for assessing the quality of lesson planning materials" must include mandatory criteria assessing whether materials are gender-responsive, culturally safe (as per AIATSIS guides), accessible, and relevant to diverse student contexts. A simple "stamp of quality" is insufficient if it does not guarantee inclusivity.

3. **Prioritise Transformative Professional Development:** The proposed "professional learning programs" must focus on building teacher capacity for differentiation and adaptation. The goal should be skilled professional judgment in using the platform as a foundation, not mere fidelity to a national lesson plan.

Response to Draft Recommendation 2.1: National System of Credit Transfer and Recognition of Prior Learning (RPL)

While noting this endeavour originates from the establishment of the first National Training Agenda (NTRA) and the paucity of coordinated progressive outcomes since that time, WAVE **strongly supports** the intent of Draft Recommendation 2.1 to create a national system for credit transfer and Recognition of Prior Learning (RPL). We commend the Commission for recognizing that the current "disjointed" and complex system impacts students from low socio-economic backgrounds, regional areas, and Aboriginal and Torres Strait Islander people.

However, the recommendation's primary solution—a "national database of academic credit decisions"—is dangerously narrow. This focus risks further entrenching the "skills valuation crisis" by ignoring the informal, non-accredited learning central to the experience of many women and marginalised groups. The Commission's own report acknowledges that RPL can value skills from "work experience, overseas education, informal training and other life experiences", yet its central recommendation defaults to a system that privileges formal academic achievement.

Decades of research show that the RPL process itself is the main barrier. It can be "excessively detailed... time-consuming and costly", with women often needing a "supportive and encouraging" and "interactive process" to identify skills they themselves undervalue. A database will not solve this; a focus on a human-centred assessment model will.

A truly equitable and productive recognition system must therefore move beyond passively allowing for the recognition of "informal learning". Along with the re/valuing of skills associated with the care economy and feminised occupations and industries, it requires a deliberate policy shift to proactively value and credential the skills acquired through unpaid care. This means investing in assessment models and trained assessors who are equipped to see this work, help women articulate the competencies they have gained, and translate them into formal qualifications.

Amended Draft Recommendation 2.1: A National Framework for Equitable, Accessible, and Funded Skills Recognition

To address Australia's skills valuation crisis and enable equitable lifelong learning, the Australian Government should establish a national framework for RPL and credit

transfer, stewarded by the Australian Tertiary Education Commission (ATEC). This framework must be built on the following pillars:

1. **A System Free from Financial Barriers:** Recognising that fees and costs are a primary barrier to RPL uptake, the assessment process must be publicly funded and provided at no or very low cost to the individual.
2. **A Person-Centred and Supportive Assessment Model:** Mandate a national RPL model that is accessible, interactive and supportive, moving away from complex forms towards guided processes that help women identify and articulate skills that are often undervalued. This model must be co-designed with diverse communities to ensure it is culturally safe and relevant.
3. **Mandated and Specialised Assessor Training:** Establish and fund a national program to train and accredit RPL assessors. Training must include mandatory units on gender and intersectional analysis, cross-cultural awareness, and specific techniques for translating informal and life experience into formal competencies.
4. **The Right to Pre-Enrolment Assessment:** Legislate and enforce the right for all prospective students to have their RPL application fully assessed and decided upon before the deadline for accepting a course offer.
5. **A Broader National Skills Recognition Database:** The proposed database must be expanded beyond "academic credit decisions" to become a National Skills Recognition Database. It must actively capture precedents for skills recognised from unpaid work, community leadership, and international experience to address the "recognition gap".

Response to Recommendations on Fit-for-Purpose Occupational Entry Regulations

WAVE's view is that while the Productivity Commission's recommendations to reform occupational entry regulations (OERs) are welcome, they are framed through a narrow economic lens that overlooks their deeply gendered nature. A truly equitable approach must analyse not just whether a regulation is restrictive, but who it restricts, who it protects, and which skills it values or devalues. Without an intersectional feminist lens, these reforms risk inadvertently harming the very women and marginalised groups they should be helping.

We offer **conditional support** for the recommendations in Chapter 3 on "Fit-for-purpose occupational entry regulations". We agree that "excessive OERs impose costs that lower living standards" and can create unnecessary barriers. However, the Commission's analysis focuses on economic efficiency and competition, failing to

adequately address how OERs both reflect and shape gendered inequities in the workforce.

The key issue is not deregulation for its own sake, but ensuring that any reform is gender-transformative and addresses the "skills valuation crisis". Seemingly neutral regulations can have significant and unequal effects, particularly in feminised industries like aged care, social work, and hairdressing, where women are often required to prove their experience is 'skilled' through formal qualifications.

Draft Recommendation 3.1: Remove excessive OERs

WAVE supports removing inconsistent OERs where evidence of benefit is weak. While the Commission views the Certificate III requirement as a barrier, such qualifications have historically been crucial for:

- **Professionalising a feminised workforce**, combating the tendency to view these skills as "natural attributes" rather than acquired expertise
- **Providing a basis for fairer wages and career progression**, countering the low wages and low bargaining power women often face when they enter the paid economy

Any deregulation in these sectors must not become a race to the bottom that devalues skills and worsens pay and conditions for a predominantly female workforce.

Draft Recommendation 3.2: Expand entry pathways and streamline qualifications

WAVE **strongly supports** this recommendation, as it directly aligns with our core argument for valuing diverse forms of knowledge and experience.

Trades Pathways: We particularly applaud the Commission's recognition that traditional apprenticeships are often "designed around the needs of young male school leavers". Expanding non-apprentice and alternative pathways is a critical gender-equity measure that will improve access for women, mature-age workers, and migrants who are currently locked out of these occupations.

Valuing Experience Over Credentials: The Commission's case study on aged care highlights the risk of credentialism, noting that a mandatory Certificate III could create barriers for Aboriginal and Torres Strait Islander and culturally diverse workers. This perfectly illustrates the "skills valuation crisis". A fit-for-purpose system must create pathways that formally recognise the immense value of life experience, cultural knowledge, and linguistic skills—competencies that are often more critical to quality care than a baseline qualification. True productivity comes from attracting the "right talent", not just the formally qualified.

Draft Recommendations 3.3 & 3.4: Improve reviews and incentivise reform

WAVE supports the call for regular, independent reviews of OERs. However, these reviews will only reproduce existing biases unless they are explicitly mandated to use an intersectional and gender-transformative framework.

A purely economic or risk-based assessment is insufficient. Reviews must be required to ask:

- Does this regulation systemically undervalue skills in feminised sectors?
- Does it create disproportionate barriers for women, migrants, or Indigenous peoples?
- What is its impact on the pay, professional standing, and safety of the workforce in that sector?

To be effective, these review bodies must include gender experts and representatives from community organisations to ensure that the "lived realities of women and marginalised communities" inform any policy changes.

OUR CALL TO ACTION

We urge the Productivity Commission's final report to adopt an overarching **intersectional equity framework** that:

- **Disaggregates ALL data as a matter of course** by gender, cultural background, and other identity factors to reveal where policies truly land
- **Addresses the systemic undervaluation** of skills in feminised sectors through targeted investment and recognition
- **Transforms apprenticeship systems** with measurable gender equity targets and cultural change programmes
- **Creates accessible, culturally sensitive pathways** for recognising international qualifications and life experience
- **Links government funding** to demonstrated gender equity outcomes

Australia's economic future depends on our ability to see, value, and develop the talents of all our people. When we create education and training systems that work for everyone—the skilled migrant seeking recognition, the young mother balancing study with caring, the mature-age worker changing careers—we build not just workforce adaptability, but a more prosperous, inclusive, and resilient nation.

The opportunity before us is profound: to create a workforce development system that doesn't just respond to economic change, but actively shapes a future where everyone can contribute their unique strengths to our shared prosperity.