



Submission

to the

**Productivity Commission Interim Report on
Building a Skilled and Adaptable Workforce**

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Introduction

The Australian Education Union (AEU) represents over 185,000 members employed in the public primary, secondary, early childhood and TAFE sectors throughout Australia. This submission is made on behalf of AEU members across the country in response to the recommendations and information requests made by the Productivity Commission in its Interim Report on Building a Skilled and Adaptable Workforce. This submission will respond to each of the interim report's recommendations on improving school outcomes, building skills and qualifications for a more productive workforce and the deregulation of occupational entry requirements. The AEU welcomes the opportunity to engage further with the Commission as its inquiries into the Five Pillars of Productivity progress.

AEU Response to draft recommendation 1.1:

Invest in a single national platform for all teachers to access lesson planning materials

The interim report correctly identifies several of the challenges that teachers face, including that:

- *“Student ability in Australian classrooms varies significantly. Outcomes are stagnating and some students are being left behind.*
- *Teachers spend much of their time on activities other than lesson delivery and are working long hours to finish all required tasks.*
- *Too many teachers, especially in more remote schools, are having to teach out of their field, and access to teaching tools is uneven across the country”¹*

However, draft recommendation 1.1 is not an appropriate solution to the challenges outlined above, and the assertion that the “Australian Government should invest in a single online national platform that houses a comprehensive bank of high-quality, curriculum-aligned lesson planning materials”² is misguided and a real threat to the professional autonomy of teachers and their ability to craft lesson plans in response to the context and of their specific schools and individual students.

The UN High-Level Panel on the Teaching Profession neatly summarised the importance of professional autonomy for teachers:

“Teacher autonomy and agency are important factors of job satisfaction, commitment and professional status. Teacher autonomy refers to the decisions over pedagogical approaches and curricula based on knowledge, competence and responsibility within education goals. Teacher well-being is influenced by the degree of perceived work autonomy and directly relates to job satisfaction”³

The AEU supports the professional autonomy of teachers to make use of multiple pedagogical approaches that best fit the circumstances and needs of their classes. Teachers must be able to use their professional judgement to make use of a range of bodies of knowledge, from which they

¹ Productivity Commission 2025, *Building a skilled and adaptable workforce*, Interim report, Canberra, 2025, p.7

²Productivity Commission 2025, *Building a skilled and adaptable workforce*, Interim report, Canberra, 2025, p.10

³ Transforming the teaching profession: Recommendations and summary of deliberations of the United Nations Secretary-General's High-Level Panel on the Teaching Profession, Geneva: International Labour Office, p.6

select what is relevant and most appropriate to the students in their class. They incorporate multidisciplinary research from fields such as neuroscience, psychology, and education, as well as evolving best practice for cohorts of children at risk such as trauma-informed practice.

The AEU asserts that draft recommendation 1.1 presents a very short sighted approach to managing teachers' workload pressures and the resultant attrition and occupational shortages. Instead, the AEU suggests that the Commission could examine further measures to incentivise more people to join the teaching profession or recommend increased resources to allow teachers to provide more individual support to students who need it.

As noted by Stacey et al. in their analysis of the NSW Quality Time Program, the removal of teacher responsibility for lesson planning under the guise of workload relief “risk[s] controlling or limiting the central pedagogical labour of teachers through mechanisms which chip away at the ‘core’ work of teachers” and that such attempts to centralise lesson planning “may also have perverse effects in substantively redefining what it is to be a teacher”⁴ and “reflect a contemporary example of deskilling teachers’ labour.”⁵

Rather than seeking to limit or remove the preparation of lesson plans, a core part of teaching, the Commission should be looking at ways to provide teachers with sufficient resources and time so that they can differentiate their lesson planning and lesson delivery to suit the specific needs of every child in their classroom.

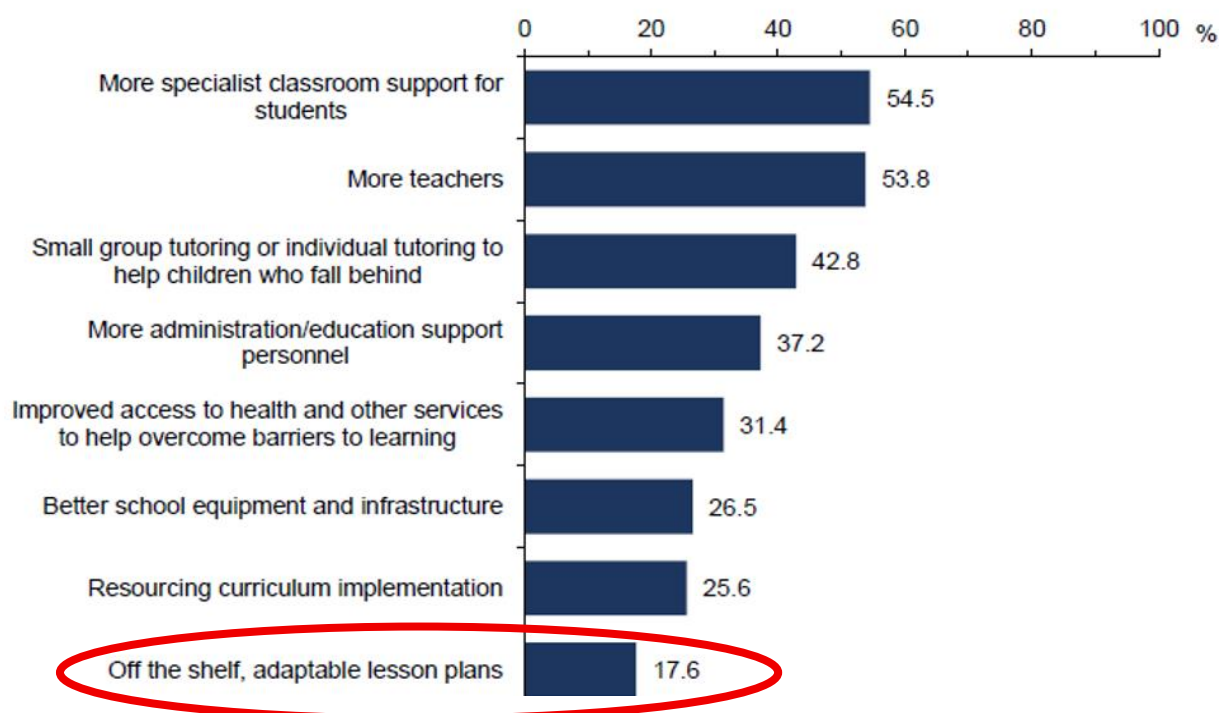
Recommendation 1.1 is in direct opposition to what teachers told the Expert Panel of the Review to Inform a Better and Fairer Education System in 2023. When surveyed for their priority areas for investment to improve student outcomes, teachers clearly selected “more specialist classroom support for students” and “more teachers” as their top priorities.

Of the eight options for greater investment offered, “off the shelf, adaptable lesson plans” were the least popular and selected by only 17.6% of teachers.

⁴ Meghan Stacey, Mihajla Gavin, Scott Fitzgerald, Susan McGrath-Champ, Rachel Wilson, *Reducing teachers’ workload or deskilling ‘core’ work? Analysis of a policy response to teacher workload demand*, *Discourse: Studies in the Cultural Politics of Education*, 22nd October 2023, <http://www.tandfonline.com/10.1080/01596306.2023.2271856> ,p.11

⁵ Meghan Stacey et.al *Ibid* p.2

Figure 1 Better, Fairer Education System teachers' survey of areas for government investment to improve student outcomes⁶



By making a national investment in lesson plans its priority recommendation to improve student outcomes the Commission has chosen to ignore the stated priorities of teachers for what would benefit their students the most and has sought to limit teachers' autonomy though the imposition of a prescribed solution that the profession has already rejected.

There are several additional issues with the interim report and its promotion of off the shelf lesson plans as a driver of productivity.

1. The Australian Curriculum already provides a plethora of high quality materials, adapted for the context of each state and territory, to assist teachers with lesson planning. It is due for review in the next year, and all lesson planning and curriculum materials used in schools must be based on the Australian Curriculum, developed in collaboration with teachers and disseminated through government agencies. It is important that curriculum development take place in an environment which acknowledges the importance of deep and early engagement with the teaching profession, in a manner which allows broad perspectives within a set of explicit principles. The development of a separate set of lesson plans as proposed by the Commission presents a real danger to maintenance of a robust and broad curriculum that still allows teachers to exercise their own professional judgement.
2. Recommendation 15 of The United Nations High-Level Panel on the Teaching Profession asserts that:

⁶ Department of Education: Review to Inform a Better and Fairer Education System – Initial Consultation Surveys, Summary analytical report, July 2023, p.12

“Teacher status and dignity are also directly related to teachers’ ability to influence policies regarding their work, including curricula and pedagogical practices. Policies should ensure teacher agency and autonomy based on knowledge, competence and responsibility within education goals, and should foster a climate of trust and respect between school authorities, communities, learners and teachers.”⁷

3. Although the Commission states that “teachers should retain autonomy and would not be required to use the materials; rather, the materials would support teachers’ decisions about how they teach”, the use of lesson plans is presented in the interim report as a fait accompli, particularly for newly qualified teachers, who are presented as hapless in the report - “beginning teachers need a strong foundation – knowledge of what high-quality teaching looks like.”⁸ The various information requests attached to draft recommendation 1.1 make no attempt at considering whether off the shelf lesson plans are appropriate, but instead jump straight to asking how they should be devised, circulated and promoted.
4. The Commission’s approach to under-resourced schools (often those with concentrations of disadvantage) demonstrate the same paternalistic and condescending approach. Off the shelf lesson plans are proposed as a catch all solution to structural inequity and a chronic lack of resources. The Commission suggests that teachers in under resourced schools should be more willing to sacrifice their professional autonomy as a time saving device – a suggestion that is not made for teachers at well-resourced schools.
5. There is little to no evidence that off the shelf lesson plans have a real impact on achievement. The Commission references Singapore and its approved library of resources and links this to its PISA outcomes but fails to mention Singapore’s substantially higher barrier to entry into Initial Teacher Education, its higher wages for experienced teachers and its superior job security.⁹ Additionally, the interim report fails to acknowledge that Singapore has in recent years significantly changed its approach to pedagogy and has been taking steps to address the negative effects of its previously high-stakes and competitive educational culture by refocusing on lifelong learning, holistic development and joy and intrinsic motivation in learning – all of which would be substantially curtailed by the use of inflexible lesson plans that are devoid of context.¹⁰
6. The Commission conflates time that teachers spend on lesson planning with compliance activities and presumes that lesson planning is a burden to be minimised rather than a core

⁷ Transforming the teaching profession: Recommendations and summary of deliberations of the United Nations Secretary-General’s High-Level Panel on the Teaching Profession, Geneva: International Labour Office, p.6

⁸ Productivity Commission 2025, Building a skilled and adaptable workforce, Interim report, Canberra, 2025, p.12

⁹ Ingvarson, L., Reid, K., Buckley, S., Kleinhenz, E., Masters, G., Rowley, G. (2014). Best Practice Teacher Education Programs and Australia’s Own Programs. Canberra: Department of Education. Retrieved from http://research.acer.edu.au/cgi/viewcontent.cgi?article=1014&context=teacher_education, p.53

¹⁰ Hwei Ming Wong, Dennis Kwek & Kelvin Tan (2020) *Changing Assessments and the Examination Culture in Singapore: A Review and Analysis of Singapore’s Assessment Policies*, Asia Pacific Journal of Education, 40:4, 433-457, DOI: [10.1080/02188791.2020.1838886](https://doi.org/10.1080/02188791.2020.1838886)

part of the job that should be properly resourced. In the AEU's 2024 State of Our Schools Survey a clear minority of teachers said that they spent too much time on lesson planning whilst 80% said they spent too much time on administration and compliance work. The issue is not that teachers want to rid themselves of time spent planning lessons, it is that their non-contact time is taken up by administration and compliance requirements.

7. The Commission presumes that each individual teacher operates in a vacuum and ignores the huge value, in terms of both time and in mentorship, of peer collaboration in the development of materials to suit their schools' contexts.
8. The interim report specifies that "these materials should draw from existing materials where these are assessed as high quality and support evidence-based teaching practices that align with how students learn"¹¹ and that "the design and delivery of these learning resources should be funded to "effectively implement the evidence-based practices recommended by AERO".¹² The AEU strongly disputes that AERO, should be the sole arbiter of what constitutes "evidence based practices". AERO uses a top down approach to tell schools what research/programs they should follow, rather than a genuine collaborative, two-way approach with schools and the teaching profession. The AEU asserts that AERO's Standards of Evidence are arbitrary and overly focused on a technocratic interpretation of aggregated evidence such as Randomised Control Trials and systematic reviews and presumes the universal effectiveness of its preferred interventions without consideration of context or relevance to the teaching profession.

Further, a new report by the McKell Institute, *Productive Lessons: Investing in a skilled, secure and sustainable education system* rejects the argument 'off the shelf' lesson plans reduce teachers' workload, stating that the Commission's proposal "creates an assumption that lesson planning is a burden to be minimised, rather than an essential aspect of the profession " and finding that "is little evidence that standardised lesson plans have a real impact on achievement"¹³ and finds that "one of the best ways to reduce the pressure on teachers and the system as a whole is to invest in the educational support and specialised staff to facilitate greater investment in teaching."¹⁴

Further, using ABS and AITSL workload data, the McKell Institute finds that instead of removing lesson planning from teachers workload, the most effective intervention would be to reallocate a significant proportion of non-pedagogical administration work to administration officers resourced to do those tasks. The report finds that reallocating 50% to 100% of teachers admin workload would restore between 67 million and 107 million hours to Australia's teachers annually

¹¹ Productivity Commission 2025, *Building a skilled and adaptable workforce*, Interim report, Canberra, 2025, p.21

¹² Productivity Commission 2025, *Building a skilled and adaptable workforce*, Interim report, Canberra, 2025, p.20

¹³ Thistleton, R & Jackson, S, *Productive Lessons: Investing in a skilled, secure and sustainable education system*, McKell Institute, p.13-14

¹⁴ Thistleton, R & Jackson, S, *Productive Lessons: Investing in a skilled, secure and sustainable education system*, McKell Institute, p.7

(334 to 210 hours per teacher) for increased planning time, collaboration and improved work/life balance.¹⁵

Indeed, the Productivity Commission, in its 2023 *Review of the National School Reform Agreement*, argued for teachers' administrative burden to be reduced and espoused the retention benefits of teachers having more time available for lesson planning:

“Reducing low-value tasks would not only improve teacher effectiveness — by increasing the time teachers have available to prepare for lessons and undertake professional development — it could help retain more teachers.”¹⁶

Public school students in Australia reflect the diversity of our modern society and thus there cannot be a one size fits all approach to teaching. Recommendation 10 from the UN High-Level Panel on the Teaching Profession says, “Governments should develop policies and measures to promote equity, diversity and inclusion in the teaching workforce, in particular for vulnerable and marginalized groups, beginning with workforce planning.”¹⁷ Equally, just as no single practice or mandated resource can address education inequity, neither can teachers alone. However, there is no solution that does not involve “an inclusive environment for teachers in all their diversity.”¹⁸ The voice of teachers whose experience is primarily among the most educationally disadvantaged student cohorts must be central to the consideration of any educational practice.

The AEU strongly recommends that the Commission recognise that improving student outcomes is inextricable from addressing the teacher attrition and workload crisis in Australian schools, and that this must be addressed by providing teachers with adequate time to plan lessons that are suitable for their students and their schools in collaboration with their colleagues. This can be achieved through the removal of the huge burden of additional administration and compliance work that teachers are now subject to. OECD data shows that teacher's job satisfaction and self-efficacy are negatively related to the time they spend on administrative tasks, particularly in Australia.¹⁹ Similarly, the vast majority of the 12,381 teachers surveyed in 2024 by the AEU (86%) felt that they spent too much time on administrative tasks and 99% of teachers reported they had insufficient time outside of classes for lesson planning, marking, report writing and administration work within their paid working hours.

Education policies should support and promote teacher professional judgment. Schools and systems operate best on shared values and a common responsibility. For this to occur the system bureaucracy must be closely connected to the culture of public schools. The location of decision making should relate to what is best for student learning across the system.

¹⁵ Thistleton, R & Jackson, S, *Productive Lessons: Investing in a skilled, secure and sustainable education system*, McKell Institute, p. 14.

¹⁶ Productivity Commission 2022, *Review of the National School Reform Agreement*, Study Report, Canberra. p.12.

¹⁷ Transforming the teaching profession: Recommendations and summary of deliberations of the United Nations SecretaryGeneral's High-Level Panel on the Teaching Profession, Geneva: International Labour Office, p.5

¹⁸ Transforming the teaching profession: Recommendations and summary of deliberations of the United Nations SecretaryGeneral's High-Level Panel on the Teaching Profession, Geneva: International Labour Office, p.5

¹⁹ OECD (2014). *Talis 2013 Results: An International Perspective on Teaching and Learning*, TALIS, OECD Publishing. <http://dx.doi.org/10.1787/9789264196261-en>

As such we strongly caution the Productivity Commission against recommending the provision of ‘off the shelf’ national lesson plans. If enacted, this recommendation would deny professional autonomy to teachers to make use of multiple pedagogical approaches that best fit the circumstances and needs of their classes. Any model that assumes the homogeneity of all students in a year level at a certain point in time and does not consider the breadth of individual learning needs of each student and, in the end, can only serve to exacerbate achievement gaps.

It is important that the development of learning resources is conducted in a way that acknowledges the importance of deep and early engagement with the teaching profession, in a manner which allows broad perspectives. The teaching profession must play a key role in developing, implementing, and reviewing all policy related to their work and must be provided the professional respect to determine the most effective approach to lesson planning in their own classrooms.

Respect for teachers as professionals who are best equipped to make judgements about teaching and learning strategies and lesson sequencing is paramount. Rather than seeking quick fix “off the shelf” approaches to addressing workload, it is essential that teachers are given the time and space to consider their practice and are granted a level of trust and professional autonomy that allows them to plan lessons to the benefit of their own students.

AEU response to draft recommendation 1.2:

Lead national efforts to ensure equitable access to educational technology (edtech) and artificial intelligence (AI)

The AEU believes that the development of and expanding use of Artificial Intelligence (AI) technologies will continue to impact students, the teaching profession, public education and the broader community in both positive and negative ways. As also noted by the Commission, the AEU recognises that the positive use of technology has the potential to enhance the quality of teaching and learning processes, enrich educational activities and support communications between educational institutions, teachers, students, and parents/caregivers.

Advances in AI and the integration with education, and the elevation of the role of digital learning especially as a result of remote learning during the COVID-19 pandemic demonstrated that the business model of the major international edtech companies involves entrenching their products in education systems and schools, with little concern about their educational value and without transparency about the pedagogical, curriculum, and assessment and reporting algorithms integral to them.

The current proliferation of third-party organisations seeking influence over the curriculum - from thinktanks pushing their own off the shelf lesson plans, to edtech companies seeking to profit from the creation and sale of AI generated teaching and assessment materials, are a real danger to the maintenance of a robust and broad curriculum that still enables teachers to exercise their own professional judgement.

Curriculum materials must ensure that the advantages of technological integration are equitably available to all students. While the integration of technology has the potential to enrich the teaching and learning process, it does not inherently have a positive impact on equity, inclusion,

and quality in education. As technology becomes more prevalent in education, the digital divide is growing ever wider. Inequality in access to technology exacerbates existing inequalities in access to education.

For this reason, the AEU supports draft recommendation 1.2 that the “Australian Government should provide national leadership on edtech and AI in schools, and work to make the best available tools available to all teachers.”²⁰

Further the AEU recommends that the Australia Government should ensure that the use of AI in public education should align with the following principles drawn from the *AEU Position Statement on Technology and Artificial Intelligence (AI) in Teaching and Learning 2023*²¹, namely:

1. AI tools should support the needs of the teaching profession and students and therefore technology and AI which is used in education must be subject to the professional judgement of the teaching profession and based on sound educational principles, robust pedagogical practice and/or evidence-based education research
2. Central to the development, implementation and use of technology is the relationship between teacher and learner which must remain the basis of the teaching and learning process, and while technology can certainly supplement this, its appropriate use must be under the supervision of qualified teachers and other educators with expertise in pedagogy and student learning.
3. Governments must ensure that edtech companies and AI enterprises do not use public education as a for-profit revenue avenue and that any products integrated into learning is done via pedagogical assessments and consultation with teachers via their union.
4. As AI is a two-way technology largely controlled by a handful of private enterprises, namely Google, Microsoft, IBM, Pearson, and Amazon, it is essential all governments ensure that the privacy and security of students is the key consideration in use. Regulation and transparency on how student data will be collected, stored, protected, and used is required.
5. All schools will need significant Commonwealth investment in information technology (IT) as well as reliable internet access and advanced digital literacy training.
6. Data and digital sovereignty must be addressed by governments. The AEU cautions that most AI training has occurred from a singular dominant cultural perspective and currently does not adequately represent broader society, and that applications such as ChatGPT’s data source is not always current and is sourced outside of Australia, and in particular does not consider Aboriginal and Torres Strait Islander data sovereignty.
7. Algorithms broadly sourced content for AI applications from across the internet, allowing copyrighted works to be knowingly or unknowingly used without permission, and that copyright ownership of AI-developed materials is unclear as

²⁰ Productivity Commission 2025, *Building a skilled and adaptable workforce*, Interim report, Canberra, 2025, p. 25

²¹ AEU Position Statement on Technology and Artificial Intelligence (AI) in Teaching and Learning 2023

copyright currently does not lie with the original material creators nor the person using AI to create new works. The Statutory Education Licence allows Australian educators to copy, adapt and share text and images without a copyright clearance (permission) if:

- a. they work for an institution that is covered by fair compensation arrangements; and
- b. their use is solely for educational purposes.

A Commonwealth Government policy framework, including a Quality Assurance and monitoring framework as recommended by the Commission, is needed to provide students with broad, equal access to technology and learning and to equally protect students from any potential harm for the use of AI and related adaptive technologies.

Governments and their respective education departments must urgently engage with the teaching profession via their union to develop a national policy framework that addresses the use of technology and AI in teaching and learning.

It is essential that teachers retain control of any use of AI in schools and therefore all efforts to integrate AI and edtech into schools must first:

- consider the ethics, curriculum and pedagogical issues
- address occupational, health, welfare and safety issues
- ensure that the implementation of AI is equitable, accessible and inclusive
- ensure that AI tools and their implementation is free of cultural, racial and gender biases and that they should not perpetuate or amplify existing biases or discrimination
- ensure that private for-profit operators are prevented from exerting inappropriate influence via platforms and products, on the processes of teaching and learning in educational settings and systems
- ensure that a digital equity audit is undertaken to ascertain the extent of digital inequality experienced by students and educational settings
- consider the issues of data sovereignty and copyright and that the use of AI in public education must be transparent, including its applications, what data is collected and how that data is used
- ensure that the teaching profession is provided with high quality professional development, systemic support and professional autonomy
- ensure that the teaching profession and students are provided with guidance and training on the ethical use of AI tools
- ensure equitable and fair resourcing for all students, including digital access; and undertake ongoing evaluation of AI implementation to ensure that it supports the needs of students and the teaching profession and aligns with the appropriate ethical standards and guidelines that govern teaching and learning practices.²²

²² AEU Position Statement on Technology and Artificial Intelligence (AI) in Teaching and Learning 2023

AEU response to draft recommendation 2.1:

Move toward a national system of credit transfer and recognition of prior learning (RPL)

The Productivity Commission's Interim Report recommends that governments expand the use of recognition of prior learning (RPL) to make better use of the skills already in the workforce and to reduce duplication of training. While the AEU acknowledges the importance of recognising the existing capabilities of workers, we reject the assumption that expanding RPL as currently practiced will achieve these goals. The record of many private providers of RPL in the Australian vocational education and training system is poor, with widespread evidence of misuse, inconsistent quality, and, in some cases, outright fraud. To continue promoting RPL without addressing these structural issues risks undermining confidence in qualifications, devaluing the skills of workers, and perpetuating the very inefficiencies the Commission seeks to resolve.

The most notorious failures emerged during the expansion of contestable funding and the rise of for-profit RTOs. A 2015 Senate Inquiry found extensive evidence of unscrupulous private providers enrolling students in qualifications and then signing off entire cohorts through RPL without conducting any genuine assessment of competence²³. Case studies documented students who had never attended training being granted full qualifications, and employers pressured into certifying skills that were not actually demonstrated in the workplace²⁴. The Productivity Commission itself has acknowledged in earlier reports that RPL practices often fail to meet even minimum standards of evidence, with providers substituting paperwork for practical assessment²⁵.⁴The cumulative effect of these practices has been to damage the credibility of vocational qualifications, undermine public trust in the system, and harm the reputation of genuine providers.

Research also shows that the RPL model is particularly ill-suited to SMEs and to disadvantaged learners. Jobs and Skills Australia has documented that small businesses often lack the resources or expertise to support evidence-gathering for RPL applications, and workers from disadvantaged backgrounds are less likely to have the documentation or employer support necessary to demonstrate prior learning in the formal way required²⁶. The OECD has noted in comparative studies that RPL systems without strong public oversight frequently reinforce inequities, as well-resourced workers and firms can navigate the process, while those most in need of recognition are left behind²⁷. Expanding RPL without addressing these underlying inequities risks exacerbating inequality rather than alleviating it.

The AEU contends that the proper role of RPL is narrow and should be carefully managed. Where workers have demonstrably acquired skills through work experience or informal training, there

²³ Senate Education and Employment References Committee, *Getting our money's worth: The operation, regulation and funding of private vocational education and training (VET) providers in Australia*, 2015.

²⁴ Productivity Commission / NCVER, *Recognising Prior Learning in VET: At a Glance*, 2010.

²⁵ External evidence on RPL failures: NCVER studies; Productivity Commission VET inquiry (2011); Parliamentary inquiries into VET FEE-HELP (2015–2017)

²⁶ Jobs and Skills Australia, *VET Workforce Study*, 2024.

²⁷ OECD, *Preparing Vocational Teachers and Trainers*, 2022; international evidence on pathways and programme design

should be clear pathways to have those skills recognised. But this recognition must occur through publicly accountable processes, with assessments conducted by qualified TAFE teachers who are equipped to ensure that competency standards are genuinely met. Public delivery ensures consistency, integrity, and alignment with national qualification frameworks. Any attempt to outsource RPL to private providers, or to reduce it to a tick-and-flick exercise, will only repeat the costly mistakes of the past.

The Commission's recommendation also fails to consider the impact on the VET workforce. If RPL is expanded without resourcing, TAFE teachers will face additional workloads and pressure to expedite assessments, creating perverse incentives and undermining educational quality. As the VET Workforce Blueprint emphasises, the system is already grappling with shortages and high levels of casualisation, and piling new responsibilities onto under-resourced staff will only worsen attrition.²⁸ Any reform of RPL must therefore be linked to investment in secure, well-supported teaching positions.

For these reasons, the AEU urges the Commission to revise Recommendation 2.1. RPL should remain available, but its expansion should be contingent upon strict safeguards: all RPL assessments to be conducted within TAFE; clear national standards and moderation processes; and resourcing for secure, professional jobs for the VET workforce. This is the only way to ensure that recognising prior learning contributes to skills development without undermining the integrity of qualifications or the public interest in a strong, equitable VET system.

AEU response to recommendation 2.2:

Without secure employment, appropriate induction, and funded professional development for teachers and trainers, the system simply cannot meet the scale of training that SMEs require. OECD evidence reinforces that quality vocational systems internationally invest heavily in the preparation and continuing development of their teaching staff, recognising that this is inseparable from student outcomes and employer confidence²⁹.

Equity must also be a central consideration. Publicly led SME training delivered through TAFE ensures that opportunities are not confined to larger metropolitan firms, but extend to regional and remote communities, First Nations peoples, women, and workers from disadvantaged backgrounds who are often employed in SMEs. When training markets are left to operate without equity obligations, these groups are the first to miss out, and governments should think proactively in designing policy to address this.

For these reasons, the AEU urges the Commission to reconsider the framing of Recommendation 2.2. SMEs should be supported to train their workforce, but this must be done through public investment in TAFE-led partnerships, not by dispersing funds through employer subsidies or contestable markets. Governments should establish dedicated SME Skills Advisors within TAFE to assist small firms in diagnosing their training needs and accessing accredited, portable courses.

²⁸ Jobs and Skills Australia, VET Workforce Blueprint, 2024

²⁹ OECD Publishing, *Teachers and Leaders in Vocational Education and Training* (2021), pp. 74, 100, 109, 138

All publicly funded SME training should be delivered through TAFE to ensure quality, consistency, and accountability, and should be tied to measures that strengthen the VET workforce itself. This approach will deliver not only for SMEs, but for workers, communities, and the broader economy.

AEU response to recommendation 3.1:

Remove excessive occupational entry regulations that offer limited benefits

The Australian Education Union supports a systematic review of occupational entry requirements where the purpose of the review is to remove duplication and administrative burden, and where the safety of children and young people, the quality of teaching and training, and the integrity of qualifications remain the first test of any proposed change. The Commission's focus on unnecessary barriers should be read together with the long history of evidence that regulation, when proportionate and clearly tied to risk, protects learners and the community and sustains public confidence in skilled work.

Experience across education and training shows that calls to ease licensing or registration obligations often escalate during periods of shortage, yet the drivers of shortage rarely sit in the regulation itself but in wages, workload, supervision capacity, and training pipeline constraints³⁰. Reducing entry requirements without addressing those structural drivers shifts risk to students and new entrants and weakens service quality, which is why the union's starting point is a balanced, evidence-based test that distinguishes genuine red tape from safeguards that must be preserved³¹.

A review framework that would command educator confidence is one that is anchored in risk assessment and public interest, that is co-designed with teachers, trainers and their unions, and that publishes clear criteria for change including demonstrable equivalence of safety and quality where any alternative entry pathways are contemplated. Such a framework should adopt right-touch regulation in which the minimum effective intervention is used after transparent analysis, and in which decisions are moderated nationally so that one jurisdiction's changes do not pull standards to the lowest common denominator.

Within vocational education and training, the AEU cautions against treating licensing reduction as a lever for workforce supply in trade-based occupations, since strong evidence shows that completion and competence depend on supervised learning, mentoring, and structured assessment rather than shorter or looser pathways³². If governments wish to increase mobility, they should prioritise mutual recognition that lifts consistency to the highest proven standard and they should invest in the supervision capacity of employers and the paid time of educators to support learners on the job.

The Commission's proposal for regular reviews will be constructive if it is governed by transparent terms of reference that specify safety, consumer protection and quality as primary tests, that require publication of the evidence relied upon including cost-benefit methods and distributional impacts, and that include explicit workforce and equity impacts in the analysis.

³⁰ Preparing Vocational Teachers and Trainers (OECD, 2022), p.46.

³¹ The Capture of Public Wealth by the For-Profit VET Sector, p.33.

³² Preparing Vocational Teachers and Trainers (OECD, 2022), p.39-60; VET Workforce Blueprint (Nov 2024)

Reviews should report how changes will be implemented, monitored and audited, including how complaints and adverse events will be tracked after reforms commence, and they should confirm that education regulators and registration bodies have the resources to enforce the rules they administer.

AEU response to recommendation 3.2

Expand entry pathways and streamline qualification requirements for occupations

The Commission highlights entry pathways as a lever to expand participation and better align training with labour market needs. The AEU supports broadening access to high-quality, portable qualifications, but cautions against approaches that narrow pathways to short, unaccredited products or rely on employer purchasing power rather than system stewardship. Australian and international evidence indicates that the most effective pathways combine on-the-job learning with strong institutional components delivered by TAFE, ensuring that learners acquire both occupational competence and transferable skills that support mobility and progression³³. Historical experience shows that TAFE's role as the public anchor has been essential to equity of access, particularly for regional communities, First Nations peoples, women returning to work, and migrants, while market-driven reforms fragmented pathways and weakened quality assurance³⁴.

Accordingly, entry pathways should be planned and funded as public goods. School-to-VET transitions, pre-apprenticeship and apprenticeship models, and adult upskilling should be designed and delivered through TAFE so that learners can step between modules, micro-credentials and full qualifications with confidence that credit will be portable and assessment robust. The OECD's analysis of dual and alternative entry models emphasises the importance of clear progression arrangements and teacher capacity to support diverse learners, and it warns against pushing recognition and assessment into thinly regulated corners of the market³⁵³⁶. Equity cannot be an afterthought: pathway design must be accompanied by outreach, learner support, and regional loadings to prevent thin markets from stranding learners without access to high-quality vocational education.

AEU response to recommendation 3.3:

Improve the regular reviews of occupational entry regulations

The AEU supports the principle of regular review of occupational regulations where the purpose is to prevent licensing creep and to align settings with contemporary evidence while maintaining safety and quality as the primary test, because confidence in qualifications and in public protection depends on rules that are neither static nor captured by narrow interests and that are reviewed through a transparent process.

³³ McCrindle / Victorian TAFE Association, *TAFE Value and Perception Challenge Research Report* (2023), p.

³⁴ NCVER, *Development of TAFE in Australia* (3rd ed., 2001)

³⁵ OECD Publishing, *Preparing Vocational Teachers and Trainers* (2022), pp. 4–5, 20, 43, 74, 100 on progression, teacher capacity, and balancing quality and flexibility.

³⁶ OECD Publishing, *Teachers and Leaders in Vocational Education and Training* (2021), pp. 74, 100, 109, 138 on institutional roles, work-based learning quality, and regulation.

The AEU opposes any review of occupational entry regulations which is conducted with the explicit intent of reducing regulations, without considering why the regulations are necessary in the first place.

A credible review framework would be independent, would publish its terms of reference and methods, and would weight safety risks and consumer harms alongside economic costs so that deregulatory choices are not privileged by default, and it would require consultation with educators, unions, regulators and affected communities with results published including minority views and data sources.

AEU response to recommendation 3.4

Incentivise occupational entry regulation reform through National Competition Policy

The Commission's call for better data and monitoring is essential, but the locus of stewardship matters. Jobs and Skills Australia's Workforce Study ³⁷ repeatedly highlights fundamental gaps in the basic information needed to plan and staff the system, such as headcount and FTE by role, age profile, contract type, qualifications, induction and CPD participation, and regional distribution, making it difficult to target investment or evaluate reform. A credible response requires a national data architecture that captures these elements consistently across jurisdictions and providers, and that is publicly reported to support accountability. The monitoring task should sit within a public stewardship model centred on TAFE, to avoid conflicts of interest and to ensure that quality assurance, particularly in high-risk domains such as assessment and RPL, remains independent of provider commercial incentives.

Measures must be coupled with policy levers that correct the behaviours the data reveals: if workforce data shows high casualisation and attrition, governments must fund secure positions and induction; if participation data show regional gaps, loadings and outreach must follow if monitoring identifies RPL anomalies, independent audits and sanctions must be applied. Without stewardship and funding, better dashboards alone will not deliver better outcomes.

³⁷Jobs and Skills Australia, VET Workforce Study, 2024; see findings on workforce size, composition, and shortages.