

As an RTO Manager responsible for delivering nationally recognised training in hairdressing and barbering, I am very concerned about the Productivity Commission's proposal to deregulate entry requirements for hairdressers and barbers in South Australia. While I support reforms that make training pathways more adaptable, I strongly believe removing the "qualified or apprentice" requirement poses serious risks to our industry, consumers, workforce, and training sector.

1. Safety and Consumer Protection

- Hairdressing and barbering involve high risk services such as chemical treatments, bleaching, colouring, and razor work. These carry risks of burns, chemical inhalation, infections, allergic reactions, and scarring if not performed correctly.
- Consumers lack the technical knowledge to assess competence before services are delivered. Deregulation removes a key safeguard that qualifications currently provide
- Qualifications provide an essential safeguard, ensuring only practitioners with proven competence undertake high risk services.

2. Skills and Professional Standards

- The Certificate III develops not only technical ability but also workplace safety, hygiene, and client care - areas that cannot be guaranteed through informal "on-the-job" training.
- Removing qualification requirements risks creating a workforce with variable skill levels, undermining the professionalism and reputation of the trade.

3. Worker Protection and Exploitation

- Without mandated apprenticeship pathways, young workers are at risk of exploitation through unpaid or underpaid "training."
- Apprenticeship contracts and the award system provide a safety net of fair wages, conditions, and structured learning — all of which could be bypassed under deregulation.

4. Compliance and Fair Competition

- Compliant salons that employ qualified staff and apprentices will be undercut by unqualified operators, creating an uneven playing field.
- Deregulation risks a "race to the bottom" where cost cutting overrides safety, training, and worker protection.

5. Training Sector Impacts (RTO Perspective)

- RTOs like ours deliver structured, competency-based training that ensures consistency, quality, and national recognition.
- Deregulation will likely lead to a sharp decline in enrolments for Certificate III qualifications if individuals can enter the workforce without formal training.
- This undermines the sustainability of RTOs and threatens jobs for trainers and assessors.
- A weaker training pipeline means fewer apprentices entering the system, fewer qualified trainers in future, and ultimately a diminished capacity to maintain high standards across the sector.
- It also risks devaluing the investment already made by learners, employers, and government in our accredited training system.

6. Evidence from Training Outcomes

- Apprenticeship and Certificate III graduates consistently achieve high employment outcomes and long term career stability.
- Informal or ad-hoc training produces variable results, leaving workers underprepared and creating inconsistency in service quality.

7. Constructive Alternatives

While we oppose deregulation, we support reforms that make pathways more flexible without sacrificing safety or professionalism:

- Allow unqualified assistants to undertake only low-risk tasks (e.g: shampooing, blow-drying) under supervision.
- Strengthen Recognition of Prior Learning (RPL) and competency-based progression for experienced workers or skilled migrants.
- Introduce alternative pathways only with safeguards, such as:
 - Formal competency assessments.
 - Mandated supervised hours.
 - Coverage under the award to protect against unpaid labour.

Conclusion

The current South Australian framework requiring practitioners to hold a Certificate III or be an apprentice under supervision is not excessive regulation. It is a proportionate safeguard that:

- Protects consumers from significant safety risks.
- Ensures consistent professional standards.
- Protects young workers from exploitation.
- Maintains fair competition across the industry.
- Sustains the integrity of the RTO and apprenticeship training system.

Deregulation would not only expose consumers and workers to harm but would also destabilise the training sector and devalue our nationally recognised qualifications. We urge the Productivity Commission to ensure any reforms retain minimum competency requirements for high-risk services and protect the long-term sustainability of the hairdressing and barbering workforce.

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