
**RESPONSE TO THE
AUSTRALIAN GOVERNMENT PRODUCTIVITY COMMISSION
DRAFT RESEARCH REPORT ON THE
VOCATIONAL EDUCATION AND TRAINING WORKFORCE**

**BY ANDREW MCINTOSH CPA
MELBOURNE, VICTORIA, 6 APRIL 2011**

The Aboriginal and Torres Strait Islander people are acknowledged as the First Australians and respect is paid to the Elders, past and present, from all the Nations across Australia.

For tens of thousands of years the strength and resilience of Indigenous people has been guided by the wisdom of the Elders. The courage of all Aboriginal and Torres Strait Islander people, often in the face of great adversity, is acknowledged.

Let the real opportunities afforded by education, economic participation and strong governance take the Indigenous people of Australia to new prosperity.

EXECUTIVE SUMMARY

This submission to the Vocational Education and Training (VET) workforce inquiry will focus on VET sector implications for Indigenous Australians and Indigenous participation and inclusion in professional occupations like accounting.

Key Observations

1. **Closing the gap in Indigenous disadvantage remains a priority of Government and is one of the five strategic themes in the Council of Australian Governments (COAG) meeting's new strategic direction and increased accountability.¹**
2. **The VET workforce/sector plays an important role in improving employment outcomes and developing specialised skills and capabilities for Indigenous Australians.**
3. **The VET workforce/sector has the systems and processes to deliver skills and capabilities to the Indigenous community in all seven strategic areas for action identified in the 'Framework'² of the 2009 Overcoming Indigenous Disadvantage (OID) report.**
4. **Low Indigenous participation and inclusion levels in certain professional occupations will prolong Indigenous disadvantage.**
5. **Case study - Accounting in Australia: Indigenous participation and inclusion in the accounting profession is critical to overcoming indigenous disadvantage. However, the Australian accounting profession is well behind its international peers and domestic counterparts.**
6. **Increased professional participation and inclusion, measured through membership of appropriate professional bodies, is one action that will have "multiple advantages" for Indigenous people.**
7. **The VET sector and workforce play an important role in providing a "pathway" to professional participation, particularly for Indigenous Australians.**
8. **A lack of direct self-representation by Indigenous organisations, individuals and advocacy groups to the VET workforce inquiry is evident (to 20 March 2011).**
9. **Successful approaches, initiatives and programs could be leveraged to improve outcomes for Indigenous workers and students in the VET sector.**

¹ Council of Australian Governments (COAG) Meeting Communiqué of 13 February 2011.

² Steering Committee for the Review of Government Service Provision (2009), *Overcoming Indigenous Disadvantage, Key Indicators 2009*, 2 The Framework.

Key Recommendations

- 1. Initiate actions to (A) improve outcomes for Indigenous VET students and (B) improve Indigenous awareness, engagement and participation in the VET workforce:**
 - a. Encourage development of Reconciliation Action Plans by the VET sector;
 - b. Support Indigenous Traineeships and Cadetships in the VET sector;
 - c. Develop programs to provide Indigenous VET sector employees with “pathways” to professional membership;
 - d. Encourage other initiatives and support services like mentoring and student or professional networks for Indigenous students, workers and alumni
- 2. Initiate actions to develop VET workforce/sector capabilities to improve and ‘expedite’ Indigenous professional participation and inclusion in the general community:**
 - a. Further develop VET workforce knowledge of professional occupations and successful pathways to professional membership via the VET sector (including both pre and post VET experiences);
 - b. Develop VET workforce capabilities to promote and deliver successful pathways to professional participation for students via the VET sector;
 - c. Promote increased supply of VET qualified students and workers into careers that will increase the pool of Indigenous people with aspirations of entering a professional occupation;
 - d. Encourage other programs to enhance the participation and retention rates of Indigenous students and workers in VET and other sectors;
 - e. Professional bodies, like CPA Australia and the Institute of Chartered Accountants in Australia, should be encouraged to partner with the VET workforce and other sectors to develop pathways to professional membership.
- 3. Miscellaneous recommendations**
 - a. Reconsider or qualify the use of accounting professional bodies as a potential model for “private trainers and assessors,” based on the low level of Indigenous membership in those bodies.
 - b. Review the Productivity Commission’s internal procedures for engaging with the Indigenous community in the public inquiry and study process, including consideration of:
 - Developing a Reconciliation Action Plan;
 - Adopting appropriate procedures identified in the OID 2009 report that will enhance government engagement with Indigenous Australians;
 - An Independent Panel to advise the commission on Indigenous issues;
 - The United Nations Declaration on the Rights of Indigenous Peoples and its implications for Indigenous participation in the Commission’s inquiries and studies.
 - c. Consider leveraging Independent Panels more widely across the Commission’s ongoing functions.
 - d. Consider adding ‘professional membership’ of bodies such as CPA Australia and the Institute of Chartered Accountants in Australia, as an additional leading indicator in future OID reports for COAG’s closing the gap initiatives.

INTRODUCTION

On 22 April 2010 the Assistant Treasurer of the Australian Government issued a joint press release³ announcing:

“the Productivity Commission will research factors impacting on the early childhood, schooling and vocational training workforces

The Productivity Commission will look at current and future demand and supply within these sectors and investigate ways to structure and develop these workforces

The study will consider factors that impact on each sector's workforce, such as remuneration, working conditions, retention, training and support structures

It will also look at what level of skills and knowledge these workforces need to deliver quality education in these sectors.”

The Assistant Treasurer's Terms of Reference of 22 April 2010 for the Education and Training Workforce study included the following statements relating to Indigenous Australians:

“Background*Building the capability and effectiveness of the workforces in these sectors, particularly for Indigenous people, will be critical to achieving the outcomes agreed in these frameworks. This study is to be undertaken in this context....”*

“Cross-sectoral and integrated service delivery*the Commission is to give consideration to factors that impact on building Indigenous workforce capability in recognition of the effect this will have on improving outcomes for, employment of and services to Indigenous Australians.”*

“The VET Workforce....*Factors affecting the current and future demand for the VET workforce, and the required mix of skills and knowledge..... g) training pathways and the provision of 'second chance' education and training such as for migrant and Indigenous students.”*

“Study Process*In undertaking its study, the Commission should consult widely with relevant professionals and interested parties. It should use, but not replicate, existing work such as that underway by COAG, the relevant Ministerial Councils, Senior Officials' Working Groups and jurisdictions, including on...Indigenous reforms.”*

On 5 May 2010 the Productivity Commission issued Circular No. EDU 02 relating to the Vocational Education and Training (VET) Workforce, inviting:

“all interested individuals and organisations to register an interest in the study and you can also participate by lodging written submissions and/or through appearance at 'discussion forums.'... This is a public inquiry and the Commission invites interested people and organisations to make a written submission.”

The Commission published Circular No.3 and the VET Workforce Draft Research Report on 30 November 2010 that requested written responses to be sent to the Commission by 28 February 2011.

A review of Submissions to the Commission for this study on 20 March 2011 revealed a lack of self-representation to the Inquiry by Indigenous Australians, either via personal submissions or via Indigenous organisations. This observation relates to the initial call for submissions and also to the responses to the draft report. Several government and non-Indigenous organisations did submit content pertinent to Indigenous Australians and it is noted that the Batchelor Institute of Indigenous Tertiary Education is listed in Table A.2 of the draft report (List of visits and consultations).

The body of the draft report contains a significant number of meaningful observations and references relating to Indigenous Australians and their complex interaction with, and as part of, the VET Workforce and wider society. The Commission, however, took an over simplified approach in its one recommendation relating to Indigenous Australians:

³ NO.071 Joint Media Release with The Hon Julia Gillard MP Deputy Prime Minister, Minister for Education Minister for Employment and Workplace Relations, Minister for Social Inclusion. New Study to Investigate the Needs of Australia's Child Care, Education and Training Sectors (22 April 2010).

"DRAFT RECOMMENDATION 8.5

In order to improve delivery to Indigenous VET students, VET providers should attempt to secure the services of more Indigenous VET workers. Possible strategies include ensuring the presence of Indigenous staff members on recruitment panels and charging an Indigenous HR manager with attracting, coordinating and retaining Indigenous employees across their organisation. Recognising that it is difficult for VET to attract skilled Indigenous VET workers who are also being sought by industry, the VET sector should also put in place strategies to support Indigenous students to complete their studies within the VET sector."

The Council of Australian Governments (COAG) Meeting Communiqué of 13 February 2011 confirmed "Closing the Gap on Indigenous disadvantage" is one of five themes of strategic importance that form part of COAG's "New Strategic Direction" and "Increased Accountability."

In addition, the COAG Communiqué of 13 February 2011 recognised the importance of skills and workforce development and discussed the establishment of a national VET regulator. The regulator would drive better quality standards and regulation across the Australian VET sector and is expected to ensure "rigorous quality assurance of education and training is critical to increasing the skills and qualifications of individual workers and the productivity of the economy." The existence of a national VET regulator will increase opportunities for successful implementation, monitoring and reporting of initiatives impacting Indigenous Australians.

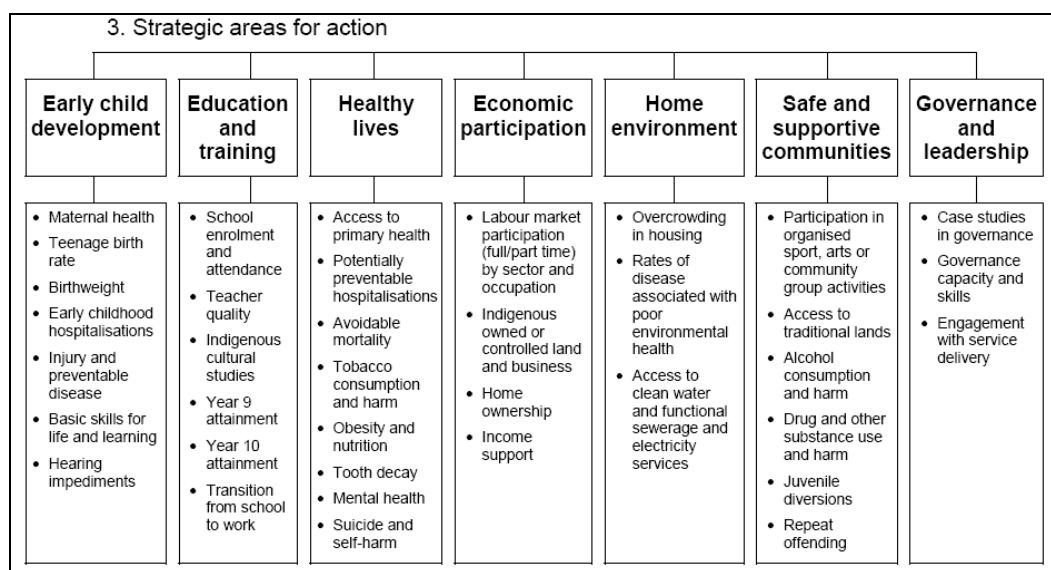
The need for a greater emphasis on recommendations relating to Indigenous Australians is supported by additional submissions (post 20 March 2011) from, on behalf of or largely relating to Indigenous Australians (Williams, Saulo, McIntosh and ANZ).

It is suggested that the Assistant Treasurer's Terms of Reference that are specific to Indigenous Australians warrant more substantive recommendations. Additionally, the importance of these recommendations is affirmed by the COAG Communiqué of 13 February 2011 that states Closing the Gap on Indigenous Disadvantage is one of five themes of strategic importance to COAG's meetings.

The Commission is therefore respectfully encouraged to revisit Draft Recommendation 8.5 and consider additional recommendations for the VET Workforce study. More specific recommendations will be provided better guidance for Australian governments, organisations and individuals to close the gap on Indigenous disadvantage.

APPROACH

The approach to this submission will reference the framework established in the Overcoming Indigenous Disadvantage (OID) 2009 Report:



This submission will also reference the “Interactions across the frameworks” discussed in relation to “multiple disadvantage, causes and effects” in the OID 2009 Report. Figures 3.31 and 3.3.2 from the OID 2009 Report illustrate the multiple effects that “overcrowding in housing” and “alcohol consumption and harm” have across different strategic areas for action.

Figure 3.3.1 Multiple effects — overcrowding

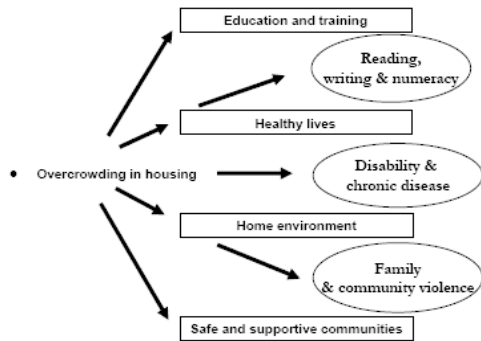
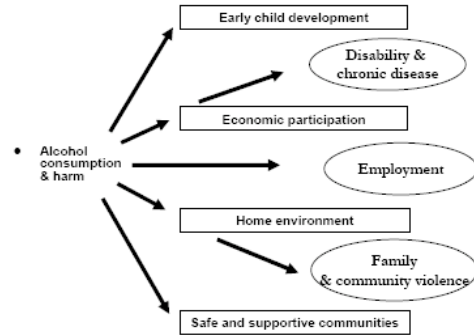


Figure 3.3.2 Multiple effects — alcohol

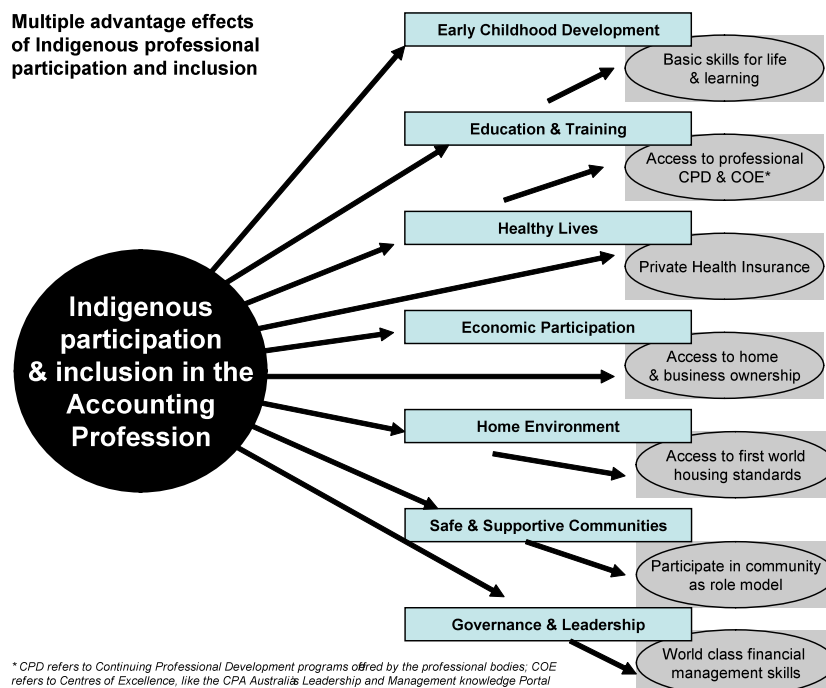


The OID 2009 Report states:

“Different aspects of disadvantage are often interrelated, and there are strong links between many of the COAG targets and headline indicators, and across the strategic areas for action. Action may be needed on several fronts at once in order to make progress and, conversely, sometimes a single action can have multiple effects.”

This submission will use the example of the accounting profession to high-light the importance of professional participation and inclusion in closing the gap in Indigenous disadvantage. It is proposed that the increased membership of professions, measured through membership of appropriate professional organisations like CPA Australia and the Institute of Chartered Accountants in Australia, is one action that will have “multiple advantage” effects. Figure A illustrates how professional participation and inclusion has a ‘multiple advantage’ effect across all strategic areas for action in OID framework:

Figure A - Multiple advantage effects – professional participation & inclusion



OBSERVATIONS

1. Closing the gap in Indigenous disadvantage remains a priority of Government and is one of the five strategic themes in the Council of Australian Governments (COAG) meeting's new strategic direction and increased accountability.⁴

- The Council of Australian Governments (COAG) Meeting Communiqué of 13 February 2011 confirmed "Closing the Gap on Indigenous disadvantage" is one of five themes of strategic importance that form part of COAG's "New Strategic Direction" and "Increased Accountability."

2. The VET workforce/sector plays an important role in improving employment outcomes and developing specialised skills and capabilities for Indigenous Australians.

- For both Indigenous and non-Indigenous people, labour force participation rates for those with certificate III or higher were significantly higher than for those with lower or no qualifications⁵
 - Certificate level III is usually considered the minimum qualification necessary to substantially improve a person's employment outcomes
- In 2007, Indigenous students were significantly more likely to enrol in VET courses relevant to governance than in university courses relevant to governance⁶:
 - 9.7 per cent of Indigenous university students compared with 29.2 per cent of non-Indigenous university students
 - 15.5 per cent of Indigenous VET students compared with 21.2 per cent of non-Indigenous VET students

3. The VET workforce/sector has the systems and processes to deliver skills and capabilities to the Indigenous community in all seven strategic areas for action identified in the 'Framework'⁷ of the 2009 Overcoming Indigenous Disadvantage (OID) report.

VET sector providers, like TAFE Western in NSW, already have courses developed that specifically address individual issues in the OID reports' seven strategic areas for action, for example:

- **Early child development:** Diploma in Children's Services - Early Childhood Education and Care, leads to career opportunities as a qualified child care worker, team leader, group leader, program leader, service/centre manager, service director, children's adviser, child development worker or special needs inclusive worker;
- **Education and training:** Certificate III in Education Support - Teachers Aide [Special], leads to career opportunities as a Teachers Aide [Special];
- **Healthy lives:** Diploma in Community Services [Alcohol, Other Drugs and Mental Health], leads to career opportunities as an alcohol and drugs worker, community rehabilitation and support worker, community support worker, mental health worker;
- **Economic participation:** Diploma in Accounting, leads to career opportunities as an Accountant, office manager, senior financial clerk;
- **Home environment:** Certificate IV Social Housing leads to career opportunities as a community housing worker, housing services officer, Aboriginal and/or Torres Strait Islander housing worker, tenancy worker, property worker, housing manager;
- **Safe and supportive communities:** Certificate IV in Leisure and Health, leads to career opportunities as a Leisure officer, activities officer, diversional therapy assistant, recreation activities officer;

⁴ Council of Australian Governments (COAG) Meeting Communiqué of 13 February 2011.

⁵ Steering Committee for the Review of Government Service Provision (2009), *Overcoming Indigenous Disadvantage, Key Indicators 2009*, 6.36 The 'outcome from education' approach

⁶ Steering Committee for the Review of Government Service Provision (2009), *Overcoming Indigenous Disadvantage, Key Indicators 2009*, 11.2 Governance capacity and skill

⁷ Steering Committee for the Review of Government Service Provision (2009), *Overcoming Indigenous Disadvantage, Key Indicators 2009*, 2 The Framework.

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- **Governance and leadership:** Statement of Attainment in Accounting Pathways leads to career opportunities in commerce, finance and accounting practitioners' offices as bookkeepers and financial clerks. The TAFE Western website states "greater opportunities become available by following pathways that include the Advanced Diploma of Accounting, leading to a bachelor degree majoring in Accounting;"

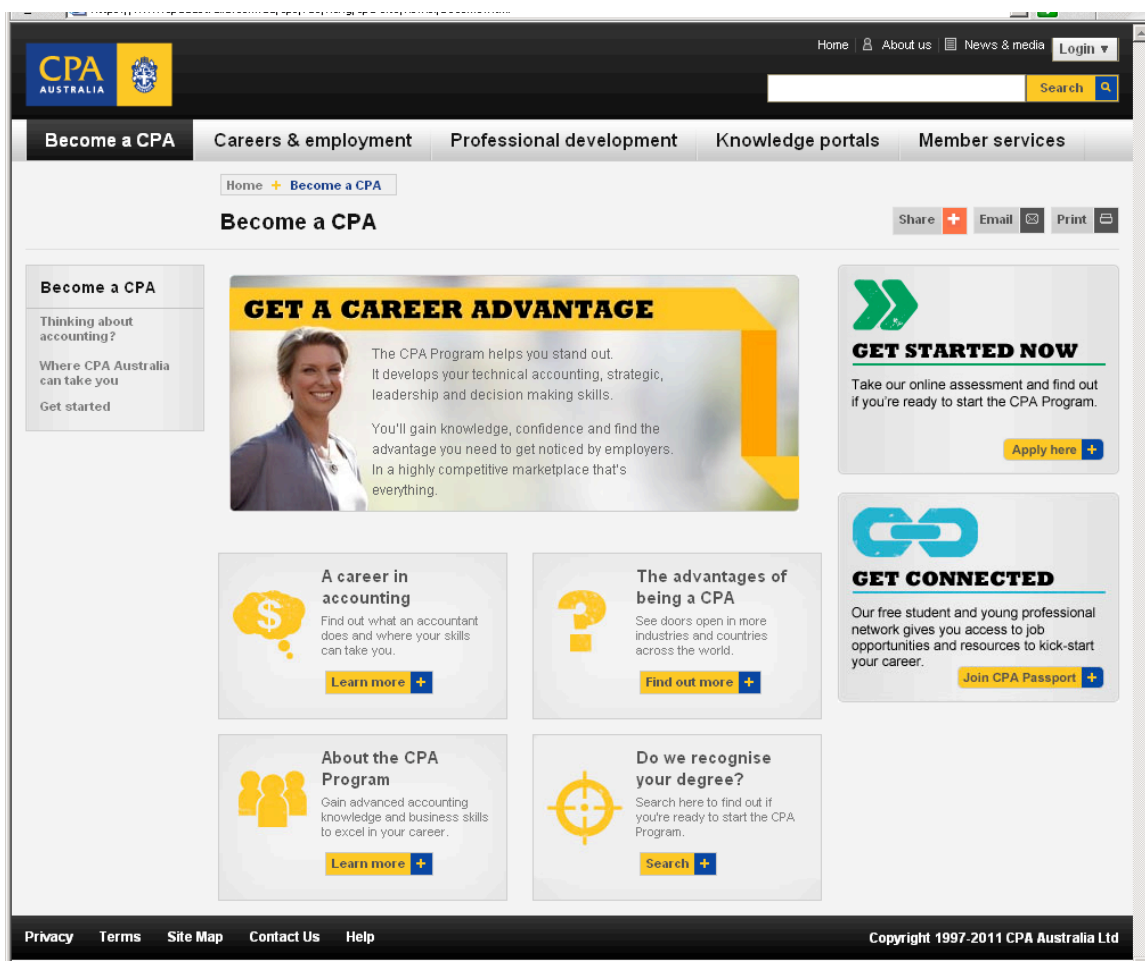
4. Low Indigenous participation and inclusion levels in certain professional occupations will prolong Indigenous disadvantage.

The existence of a strong, multi-disciplinary corps of Indigenous professionals will expedite the process of overcoming Indigenous disadvantage. Gaps in participation in particular professions or in the overall "strength of corps", will, conversely, lead to a lack of capabilities in those disciplines, related strategic areas for action and result in prolonged disadvantage.

- Only nine qualified Certified Practising Accountants (CPA) and Chartered Accountants (CA) could be identified in a 2006 study.⁸ This represents a substantially lower Indigenous participation rate than the general population. The low number of professional accountants results in limited Indigenous role models, a lack of professionally qualified Indigenous accountants as mentors. As a result, the task of achieving a 'critical mass' of professional Indigenous accountants is more time consuming and resource intensive.
- In the case of accounting, the low level of Indigenous professional participation and inclusion will limit and delay the community's capability to engage in effective governance, financial management and economic participation. It will also have a secondary impact of delaying to improvements in other strategic areas for action like home environment and safe and supporting communities.
- While increased Indigenous membership of the medical profession has enormous benefits, it will not deliver "effective financial management and administrative systems" necessary for the sustained economic prosperity of Indigenous communities. Accountants, however, are experts in financial management and can deliver the lasting systems and business infrastructure required for economic prosperity. Low Indigenous participation in the accounting profession will therefore delay this prosperity.

⁸ Lombardi, Luisa and Clayton, Bruce (2006) *Indigenous Australian accountants: why so few? A historical and cultural perspective*, *Global business & economics anthology*, vol. 1, pp. 63-74, *Business & Economics Society International*, Worcester, Mass.

5. **Case study - Accounting in Australia: Indigenous participation and inclusion in the accounting profession is critical to overcoming indigenous disadvantage. However, the Australian accounting profession is well behind its international peers and domestic counterparts in Indigenous engagement.**
- Financial management is a core component of good governance and economic participation, and is therefore essential to the prosperity of Indigenous Australians. Australian accountants are experts in financial management. The CPA Program “develops your technical accounting, strategic, leadership and decision making skills”⁹



- Governance and leadership is identified as one of the seven strategic areas for focus in the OID framework and effective financial management and administrative systems are essential parts of “good governance” (OID 2009 Report page 11.5).
- The OID 2009 Report goes on to say “Inadequate financial management skills or processes were cited as a major risk for organisations. Less than 30 per cent of organisations employed Indigenous managers or senior staff, so that Indigenous capacity was not being developed (OIPC 2006)” on page 11.15.

⁹ www.cpaaustralia.com on 5 April 2011. See copyright notice in Appendix F.

- The Australian Government publication 'Corporate Governance Handbook for Company Directors and Committee Members'¹⁰ highlights the importance of financial management in managing a corporation (p3 & 18):

2.2 Why is Corporate Governance Important?

Implementation and maintenance of good governance facilitates robust decision making and improves Strategy, Performance, Compliance and Accountability, and is characterised by ongoing monitoring and evaluation.

Effective corporate governance helps an organisation to achieve its objectives and desired outcomes and fulfill its obligations through sound:

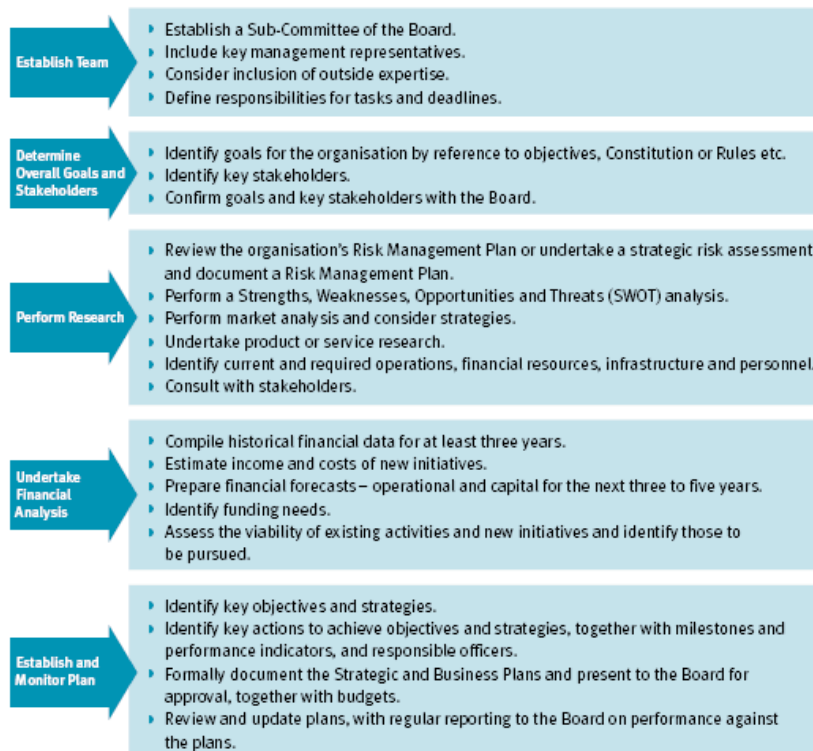
- Strategic and business planning;
- Risk management;
- Financial management and reporting;
- Human resource planning and control; and
- Compliance and accountability systems.

4.1.3 Financial Planning and Budgeting

Financial viability is essential if an organisation is to meet its ongoing financial obligations, facilitate continuance of its activities and pursue its objectives. Preparation of financial planning and budgeting is essential to underpin strategic and annual business planning to ensure financial resources will be sufficient to achieve desired organisational outcomes. Consequently monitoring of achievement against financial targets can then be performed and this is discussed further in Sub-Section 4.4.1 of this Handbook.

- The Corporate Governance Handbook also provides an overview of a suggested business planning process (p 34). The financial acumen and knowledge to understand and implement the process will draw on core skills of a professional accountant.

Diagram 3: Overview of a Suggested Business Planning Process³



¹⁰ Department of Families, Housing, Community Services and Indigenous Affairs (June 2010) *Corporate Governance Handbook for Company Directors and Committee Members, A Reference Guide to Understanding the Serious Commitment of being a Company Director or Committee Member, Second Edition*

- Indigenous corporations have become a primary vehicle for Indigenous Australians to organise, and govern their participation in the wider economy and community. Governance and financial management skills are critical to the success of Indigenous corporations.

The Office of the Registrar of Indigenous Corporations (ORIC) has identified that most Indigenous corporations failed because of poor management or poor corporate governance.¹¹

Key ORIC research findings

- Most Indigenous corporations failed because of poor management or poor corporate governance.
- Over 40 per cent of Indigenous corporations that had experienced corporate failure were returned to members after external administration. This increased to 70 per cent when liquidation only cases were excluded.
- There are three common symptoms of failure found in cases of corporate failure—failure to produce financial accounts, not holding annual general meetings and poor record keeping of members' records.
- Each of these common symptoms of failure can be improved by providing corporate governance support services.
- Corporate insolvency, in both the literature and this paper, is most often linked with poor management of the corporation by directors and staff.
- The largest cases of corporate failure involving people's intentions and behaviours relate to disputes within and between corporations.
- There are only five cases (5 per cent) involving fraud and just one case (1 per cent) involving a bankrupt director.

- Accountants are experts in financial management and can deliver financial systems, infrastructure and financial leadership necessary for good governance in the Indigenous corporate and general community.

Indigenous accountants would combine this financial know how with acute cultural awareness and also enhance the "strength of the corps" of Indigenous leaders.

See CPA Australia's Finance leaders conference flyer, "Creating the holistic leaders of tomorrow:"

Due to the low number of Indigenous accountants, it is unlikely that Aboriginal or Torres Strait Islander people will attend, and hence benefit from, the CPA Australia Finance Leaders Conference unless proactive engagement is initiated beforehand.

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Finance leaders
Creating the holistic leaders of tomorrow

Two-day conference including master classes

Sydney: 11 – 12 April 2011
Melbourne: 14 – 15 April 2011
Brisbane: 18 – 19 April 2011

The role of the modern finance leader is no longer confined to the finance department. Finance leaders of today require a holistic skill set encompassing people management, negotiation and communication skills, forward thinking, risk management and a strong understanding of market forces and industry changes.

This year's 'Finance leaders' conference will provide you with the skills and insights you need to navigate the world of financial leadership in the 21st century and step up to the next level in your career.

Key benefits

- Understand the many roles you play as a finance leader to stay ahead of your peers
- Assess the strength of your finance and management strategy through insightful case studies
- Learn how to retain women as leaders in the finance industry and how it will benefit your organisation
- Recognise the value of having work-life balance and how it will enable you to become a better leader
- Secure your dream of becoming a CEO by knowing what a CEO expects of you

16 CPD hours

Key speakers

Peter Jones CPA
Finance Director
Bacardi Uon

Michael Workman
Senior Economist
Commonwealth Bank

Dean Newlan
Partner
Forensic at McGrathNicol

Anthony Alexander CPA
National Finance Manager
Royal Flying Doctor Service

Allen Blewitt
Chief Executive Officer
Allen Blewitt and Associates

Roger Mychajlyk
Director
Objective Assessment

EARLY-BIRD
Register by 1 April!
SAVE up to \$350!

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¹¹ Office of the Registrar of Indigenous Corporations (2010), Analysis of key characteristics in Indigenous corporate failure, Research Paper

¹² www.cpaaustralia.com on 5 April 2011. See copyright notice in Appendix F.

- The Australian accounting profession is well behind its international peers and domestic counterparts, like the legal profession, in Indigenous participation and inclusion.
- In Australia, submission DR108 to the Productivity Commission by Adrian Williams CPA highlights the following:
 - Indigenous Australian accountants: why so few?¹³ by Lombardi & Clayton could identify only nine (9) fully qualified Indigenous accountants in Australia in 2006;
 - “The ‘sorry story’ of the Accounting Profession and Indigenous Australia” compares accountants per 100,000 people at 714 accountants for non-Indigenous Australians and just 1.8 accountants per 100,000 Indigenous Australians.

With approximately 2.5% of the population identified as Indigenous, all else being equal, we may have expected 3,000 – 4,000 professionally qualified accountants based on estimated 2006 membership of 150,000 in CPA Australia and the Institute of Chartered Accountants.

- Lombardi & Clayton’s 2006 findings in ‘Indigenous Australian accountants: why so few?’ reported issues that may be relatively easy overcome:
 1. Education barriers
 2. Image of the accountant
 3. Recognition of natural ability
 4. Role model/support
 5. Community service
 6. Lack of understanding and appreciation for the Indigenous Australian culture and values
- Adrian Williams CPA has outlined to the Commission suggested programs, initiatives and steps that accountants and professional accounting bodies can take to address the lack of Indigenous representation within their ranks (VET Workforce study submissions DR108 and DR111).

Members of the accounting profession in Australia, even without formal support from their professional associations, are taking direct action on a daily basis to engage with the Indigenous and help address some of the issues that Lombardi and Clayton:

- Ted Sherwood CPA, of Canberra, is passionate about improving basic bookkeeping and governance skills and volunteers with the Indigenous Community Volunteers organisation. Ted is a non-executive director on several Aboriginal Boards, provides ‘remote’ accounting services to isolated Indigenous communities and has acted as an informal role model and mentor to Indigenous Australians.
- Adrian Williams CPA, of Sydney, is passionate about encouraging Aboriginal and Torres Strait Islander people into the accounting profession and advocates for the infrastructure, support services and commitment to initiate this change.
- CPA’s from ANZ in Melbourne are mentors to young Indigenous people and exploring ways to help Indigenous trainees within ANZ Retail Branches pursue their aspirations of becoming accountants within the Bank.
- Across Australia, many more accountants volunteer in many different capacities and roles to advance to prosperity of Australia’s Indigenous people.

¹³ Lombardi, Luisa and Clayton, Bruce (2006) *Indigenous Australian accountants : why so few? A historical and cultural perspective*, Global business & economics anthology, vol. 1, pp. 63-74, Business & Economics Society International, Worcester, Mass

- Internationally, Canada, New Zealand and the United States have well developed professional networks or associations for Indigenous accountants with clear objectives, goals and strategies to improve strengthen financial management capabilities in their respective Indigenous communities (see Appendix C, D & F):



Financial Officers Association of Canada – *“We are the only organization in Canada that focuses on the capacity development and day to day needs of those Aboriginal professionals who are working in all areas of finance and management”¹⁴*



National Maori Accountants Network (New Zealand) – *“Maori in Accounting: Promote, encourage and support Maori into the profession; Promote the advancement of Maori within the profession; Promote academic and professional excellence.....”¹⁵*



Native American Finance Officers Association (United States) – *“We believe that sound financial management strengthens tribal governments and organizations. This creates strong Native American communities now and for generations to come.”¹⁶*



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By way of comparison, no examples of Australian professional accounting networks, associations or working groups for Aboriginal or Torres Strait Islander accountants were readily identifiable by the author on 5 April 2011.

It is recognised that specific political, historical and cultural contexts exist within each country that may have lead to the creation of national accounting bodies for Indigenous people, however, the purpose of this example is to illustrate the support infrastructure of Indigenous accountants in Australia.

¹⁴ <http://www.afoa.ca/> on 5 April 2011. Canadian flag courtesy of 4 International Flags at <http://www.33ff.com/flags/>

¹⁵ <http://www.nkmoa.co.nz> on April 2011. New Zealand flag courtesy of 4 International Flags at <http://www.33ff.com/flags/>

¹⁶ <http://www.nafoa.org/> on 5 April 2011. United States and Australian flag courtesy of 4 International Flags at <http://www.33ff.com/flags/>

- Other Australian professions have more developed networks and associations to support Indigenous members. This provides role models, centres of excellence, ongoing education and infrastructure for Indigenous practitioners and students. The legal profession in Australia, for instance, has a well developed professional infrastructures to support Indigenous lawyers, as demonstrated by this sample:

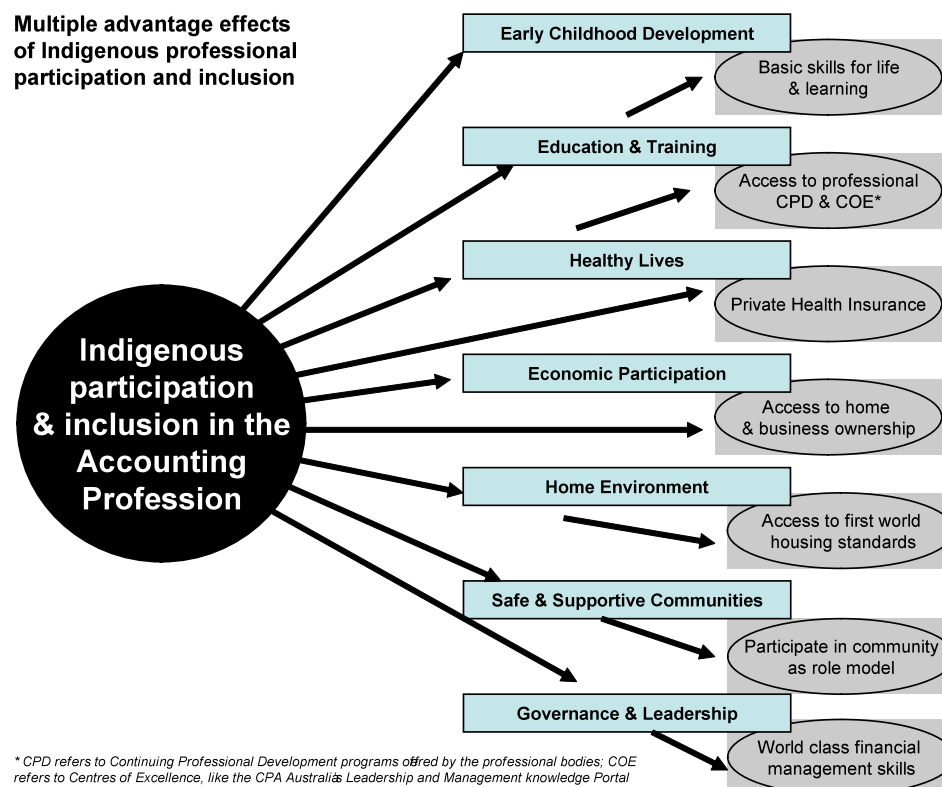
- Law Institute of Victoria's Reconciliation Action Plan (RAP)
- Law Institute of Victoria's RAP Working Group - a joint working group of the Administrative Law and Human Rights and Young Lawyers Sections
- Law Institute of Victoria's Indigenous Issues and Aboriginal Reconciliation Committee
- Tarwirri -The Indigenous Law Students and Lawyers Association of Victoria
- Indigenous Lawyers Association of Queensland

By way of comparison, no examples of professional accounting networks, associations or working groups for Indigenous accountants were readily identifiable by the author on 5 April 2011.

6. Increased professional participation and inclusion, measured through membership of appropriate professional bodies like CPA Australia and the Institute of Chartered Accountants in Australia, is one action that will have "multiple advantages" for Indigenous people.

See Figure A, where the example of employment as a professional accountant results in 'multiple advantage' effects across all strategic areas of the OID framework. All seven strategic areas of focus can benefit from participation and inclusion in the accounting profession:

Figure A – Multiple effects – advantages of professional participation & inclusion in the accounting profession



7. The VET sector and workforce play an important role in providing a “pathway to the professions” for Indigenous Australians.

- Using the example of the accounting profession, submission DR108 to the Productivity Commission’s VET Workforce study by Adrian Williams CPA on 22/03/2011 highlights the following:
 - TAFE courses are identified as the first step in “pathway to a career in accounting” and is likely the key ‘entry point’ for Indigenous Australians
- VET providers, like TAFE Western in NSW, are already actively taking steps to promote these “pathways”. For example:
 - Statement of Attainment in Accounting Pathways leads to career opportunities in commerce, finance and accounting practitioners’ offices as bookkeepers and financial clerks. The website also states “greater opportunities become available by following pathways that include the Advanced Diploma of Accounting, leading to a bachelor degree majoring in Accounting;”
- Professional bodies will sometimes provide alternative options for membership, in addition to formal university education. For example, CPA Australia now has a “foundation level” with exams designed to assess technical knowledge gained through work experience or study to ensure candidates are ready to undertake the professional level of the CPA Program.¹⁷

8. A lack of direct self-representation of Indigenous organisations, individuals and advocacy groups to the VET workforce inquiry is evident (to 20 March 2011)

- Review of the “Appendix A List of submissions, visits, consultations and roundtables” on 20 March 2011¹⁸ revealed very low levels of direct submissions from Indigenous organisations. At that date the list of 109 submissions revealed no apparent “Indigenous” organisations or individuals (based on submission content) had made a direct submission to the Commission.
- The lack of Indigenous submissions reflects the need for improved capabilities in Indigenous communities for submissions, grant writing and general business governance skill. Lack of Indigenous self-representation may be a direct result of low representation in the professions like accounting. The type of skill training is available in the VET sector.
- It is acknowledged that many of the submissions from non-Indigenous organisations and Government did include responses to specific to the Indigenous community, but the Commission should seek representation directly from the Indigenous community, not via non-Indigenous bodies speak on behalf of Indigenous people. It was also noted that the Commission did meet directly one Indigenous body via the roundtable process
- Subsequent to these observations as at 20 March 2011, there was an increase in Indigenous content of submissions at the prompting of the author (Williams, Saulo, ANZ).

¹⁷ <https://www.cpaaustralia.com.au/cps/rde/xchg/cpa-site/hs.xsl/pd-cpa-program-foundation-level.html> on 5 April 2011

¹⁸ <http://www.pc.gov.au/projects/study/education-workforce/vocational/submissions>

9. Successful approaches, initiatives and programs could be leveraged to improve outcomes for Indigenous workers and students in the VET sector.

○ **Reconciliation Action Plans**

Reconciliation Australia has had great success in promoting Reconciliation, cultural awareness and real education/employment opportunities to Indigenous people. The process provides a structured and monitored way for organisations to implement Reconciliation Action Plans (RAP). Completing a RAP will facilitate a comprehensive and structured approach to improving the VET workforce/sector capabilities to attract and retain Indigenous employees, while also improving outcomes for VET Indigenous students.

- Many large corporations, schools, Federal Government bodies and peak organisations have committed to RAPs, but participation across VET sector is currently very low
- Review of the Reconciliation Australia website on 22nd March 2011¹⁹ revealed only one VET provider listed with a RAP (North Coast TAFE) and one additional TAFE (Sunshine Coast Institute TAFE) with a RAP under development

○ **Indigenous Cadetships & Traineeships**

Indigenous Cadetships and Traineeships represent a proven and existing program that should be more widely promoted and utilised by VET sector employers. These programs will provide opportunities to improve recruitment, retention and training of the VET Workforce, increasing cultural awareness, Indigenous participation in the Workforce and provide role models to students.

The VET Workforce needs to be well equipped to understand these programs so that Cadetships and Traineeships are advocated to students and business. The VET Workforce needs to be able to work with business, commerce and government to identify opportunities and maximise opportunities for successful placements.

- An example of success in this area is ANZ, which has place over 400 Trainees since 2003.

○ **Other initiatives to improve VET outcomes for Indigenous staff and students**

- The high-level Recommendation 8.5 needs to be expanded to include specific recommendation to improve educational outcomes for Indigenous students and equip the VET Workforce with the capabilities to meet specific Indigenous needs for both staff and students
- Koorie experiences of qualifications pathways in VET: Obstacles or opportunities? By Helme, Polesel & Nicholas²⁰ provides recommendations specific to improving outcomes for Indigenous Australians. This report, and other bodies of research relating to Indigenous education, should be reviewed and incorporated into recommendations of the Commission.
- Submissions DR108 & DR111 to the Productivity Commission's VET Workforce study by Adrian Williams CPA suggest the following approach for the accounting profession:

Summary of Next Steps

Stage 1 – Raise Awareness and Mobilise

1.1 Professional Accounting Bodies Raise Awareness and Mobilise

Stage 2 – Connect and Develop Understanding

2.1 Major Research Study

2.2 Professional Bodies and University/TAFE faculties and the VET workforce use their independence and mobility to develop targeted initiatives

Stage 3 – Formal development of strategies, targets and mechanisms for future growth

¹⁹ <http://www.reconciliation.org.au>

²⁰ Koorie experiences of qualifications pathways in VET: Obstacles or opportunities? Helme, Polesel & Nicholas, CENTRE FOR POST-COMPULSORY EDUCATION AND LIFELONG LEARNING, THE UNIVERSITY OF MELBOURNE, JULY, 2005

RECOMMENDATIONS

- 1. Initiate actions to (A) improve outcomes for Indigenous VET students and (B) improve Indigenous awareness, engagement and participation in the VET workforce:**
 - e. Encourage development of Reconciliation Action Plans by the VET sector;
 - f. Support Indigenous Traineeships and Cadetships in the VET sector;
 - g. Develop programs to provide Indigenous VET sector employees with “pathways” to professional membership;
 - h. Encourage other initiatives and support services like mentoring and student or professional networks for Indigenous students, workers and alumni
- 2. Initiate actions to develop VET workforce/sector capabilities to improve and ‘expedite’ Indigenous professional participation and inclusion in the general community:**
 - a. Further develop VET workforce knowledge of professional occupations and successful pathways to professional membership via the VET sector (including both pre and post VET experiences);
 - b. Develop VET workforce capabilities to promote and deliver successful pathways to professional participation for students via the VET sector;
 - c. Promote increased supply of VET qualified students and workers into careers that will increase the pool of Indigenous people with aspirations of entering a professional occupation; For example, a larger pool of TAFE qualified bookkeepers and accountants will increase the likelihood of more CPA and Chartered Accountants eventually progressing from the TAFE sector;
 - d. Encourage other programs to enhance the participation and retention rates of Indigenous students and workers in VET and other sectors;
 - e. Professional bodies, like CPA Australia and the Institute of Chartered Accountants in Australia, should be encouraged to partner with the VET workforce and other sectors to develop pathways to professional membership.
- 3. Miscellaneous recommendations**
 - a. Reconsider or qualify the use of accounting professional bodies as a potential model for “private trainers and assessors,” based on the low level of Indigenous membership in those bodies. Lack of Indigenous professional membership may pose a significant question on the equity of such models and should be more fully understood;
 - b. Review the Commission’s internal procedures for engaging with the Indigenous community in the public inquiry and study process. Initiate actions to address situations such as the low volume of Indigenous self-representation/submissions to the VET workforce inquiry. Consider:
 - o Developing a Reconciliation Action Plan for the Commission, similar to the Commission’s Disability Action Plan;
 - o Adopting appropriate procedures identified in the OID 2009 report that enhance government engagement with Indigenous Australians;
 - o An Independent Panel to advise the commission on Indigenous issues, similar to the Independent Panel established to advise the Commission during the course of its inquiring into disability care and support;
 - o The United Nations Declaration on the Rights of Indigenous Peoples and its implications for Indigenous participation in the Commission’s inquiries and studies.
 - c. The Commission may also consider leveraging Independent Panels related to disabled and Indigenous Australians more broadly across its portfolio of inquiries, reports and functions, as opposed to use for a single inquiries (as is understood to be the case for the Panel in the disability care and support inquiry).

**RESPONSE TO THE
AUSTRALIAN GOVERNMENT PRODUCTIVITY COMMISSION
DRAFT RESEARCH REPORT ON THE
VOCATIONAL EDUCATION AND TRAINING WORKFORCE**

**BY ANDREW MCINTOSH CPA
MELBOURNE, VICTORIA, MARCH 27, 2011**

The Aboriginal and Torres Strait Islanders are acknowledged as the First Australians and respect is paid to the Elders, past and present, from all the Nations across Australia.

For tens of thousands of years the strength and resilience of Indigenous people has been guided by the wisdom of the Elders. The courage of all Aboriginal and Torres Strait Islander people, often in the face of great adversity, is acknowledged.

Let the real opportunities afforded by education, economic participation and strong governance take the Indigenous people of Australia to new prosperity.

OVERVIEW

Uncle Stan Yarramunua is an Aboriginal of the Wautharong and Yorta Yorta people. He operates a successful business, Art Yarramunua, in Collins Street, Melbourne. He works in close physical proximity to the Productivity Commission's offices at 35 Collins Street, Melbourne.

As a Senior Elder in his community, he was unaware the Vocational Education and Training (VET) Workforce inquiry had commenced in April 2010 and that it had invited public submissions from "interested" parties. He expressed concern on learning the official date to provide a response to the 'draft' had passed and that his people did not seem to have been aware of the inquiry (as evidenced by an apparent lack of Indigenous submissions). In addition, he is also concerned that there only appeared to be very limited 'direct' representation to Commission from Aboriginal people during public consultations.

As an Aboriginal artist and businessmen, Yarramunua has a unique perspective on the skills and training required by his people to succeed in business. Yarramunua sees education, involving the VET sector in particular, as critical to running a business and ultimately growing the 'business' and other capabilities in Aboriginal Australia.

He understands that basic business training provided by the VET sector, such as business administration and book keeping skills, become the foundation for building knowledge and experience that may ultimately see people 'guided' into a business or accounting career. The VET sector is, therefore, key in creating 'supply' for Indigenous business professions in fields like commerce and accounting.

As an Indigenous role model and mentor, Yarramunua stressed the need for more business and accounting role models to 'provide hope' for Aboriginal Australia. However, with only very basic literacy skills, his ability to communicate this to the Commission in a submission is limited.

Yarramunua's situation represents a very practical example of difficulties experienced by the Aboriginal community in engaging in this inquiry - Yarramunua can meet face to face or discuss his views by telephone, but only if he know the inquiry exists in the first place.

A lack of qualified business professionals in the Aboriginal community, like Certified Practicing Accountants and Chartered Accountants, also means the capabilities of the Indigenous community to interpret, critically analyse and respond to complex governance, education and business issues, such as this, is severely compromised.

The VET Workforce's awareness, engagement and capabilities to successfully educate and deliver positive outcomes for an Indigenous student is therefore critical. The VET sector needs enhanced capability to help identify, train and mentor Indigenous business professionals of the future, as it will act as a feeder for tertiary education and eventual entry into the professions.

TO THE AUSTRALIAN GOVERNMENT PRODUCTIVITY COMMISSION

**SUBMITTED BY ANDREW MCINTOSH CPA FOR AND ON BEHALF OF
YARRAMUNUA. UNCLE STAN (DRYDEN), WAUTHARONG & YORTA YORTA**
Saturday, March 26th, 2011
Collins Street, Melbourne, Victoria

THE RIGHT TO PARTICIPATE IN DECISION MAKING & THE ECONOMY

"Just because we can't read it doesn't mean we have not got an opinion. Just because I can't write it doesn't mean I have not got an opinion. I still have an opinion.

Now that we know about this, let's do something about it.²¹

Let's come together as one, because after all, we are all Australians – because if you don't care about your culture you are not a real Australian.

If we take care of our culture, and the people of our culture, that means we can include them in the wider community, education and opportunities."

INDIGENOUS ACCOUNTANTS

"Being told that there are only nine accountants²², for me to hear that as an aboriginal man, that makes me sorry that no one else is out there. It makes me sorry that no one else is giving opportunities to our people.

We have the oldest living culture in the world, so let us be proud and start looking after it. Let us give the same opportunities to Aboriginal people as for others.

It's all about responsibility as Australians. It's about coming together. If you give opportunities to the Aboriginal community to come out and learn business and accounting and be role models, then they go back into those communities as role models.

That gives us hope that there is a better life for them.

It's being done for footballers, but not for others. If I don't want to be a footballer, what opportunities do I have?

Looking back in two hundred years from now, what we start today, it will result in fifty, a hundred... thousands of accountants. Our children's, children will know."

THE DROUGHT HAS BROKEN

"People should look right in front of themselves for opportunities. If they look after the Spirit of the Land, then they will receive good karma.

When the Prime Minister of Australia said Sorry we had a drought. Since then the draught has broken and the rain has come. The rain is the tears that have come out of the eyes of our people.

If the people in charge of business and accounting can help us, then that gives our people opportunities. Good karma will come back to them."

OUR CHILDREN

"I want our kids to play together. We want little kids from our community to say I want to be a lawyer, an accountant, a judge and Prime Minister.

Please give them the opportunity to broaden their minds.

It's about a far go, a fair go for all Australians. "

YARRAMUNUA
80,011

²¹ This comment refers to the Productivity Commission's VET Workforce study and lack of submissions to the Commission directly from Aboriginal organisations and people (as at March 20, 2011, <http://www.pc.gov.au/projects/study/education-workforce/vocational/submissions>)

²² (a) Lombardi, Luisa and Clayton, Bruce (2006) Indigenous Australian accountants: why so few? A historical and cultural perspective, *Global business & economics anthology*, vol. 1, pp. 63-74, Business & Economics Society International, Worcester, Mass. (b) VET Workforce Productivity Commission Study – Submission DR108 by Adrian Williams CPA, 22/03/11

Appendix B – General information about the Aboriginal Financial Officers Association of Canada (AFOA) ²³



About AFOA

The **Aboriginal Financial Officers Association of Canada (AFOA)** is the centre for excellence and innovation in Aboriginal finance and management. We are the only organization in Canada that focuses on the capacity development and day to day needs of those Aboriginal professionals who are working in all areas of finance and management – today's leaders and those of the future.

AFOA was founded as a not-for-profit association in 1999 to help Aboriginal people better manage and govern their communities and organizations through a focus on enhancing finance and management practices and skills. AFOA's premise is that effective management is key to building social and economic prosperity and essential to successful Aboriginal governance.

How do we achieve our mandate?

AFOA achieves it's mandate by:

- conducting capacity development research aimed at enhancing competency in financial management, general management and program management;
- developing capacity development programs, products and services;
- providing professional development training;
- certifying Aboriginal financial managers;
- participating in the development of Aboriginal financial management, accounting and reporting standards;
- promoting best practices;
- encouraging Aboriginal youth to enter into the finance and management professions;
- providing a forum to share knowledge, experience and best practices; and.
- supporting Aboriginal accountability and governance efforts.

We serve our members' professional needs so that they can help their organizations and communities maximize resources, strengthen decision-making and governance, enhance the delivery of programs and services and meet accountability requirements. We serve our members' needs so that they can improve their skills and knowledge, grow professionally, and progress through their careers.

AFOA membership spans the country from the Pacific to the Atlantic to the Arctic. AFOA members are leaders in their communities, organizations, and companies. What binds them is their commitment to financial and management excellence. They are the people who get things done. You can be among them.

²³ <http://www.afoa.ca/> on 5 April 2011, Canadian flag courtesy of 4 International Flags at <http://www.33ff.com/flags/>

Appendix C – General information about the National Maori Accountants Network of New Zealand²⁴



Our Vision

To contribute to the holistic well being of Maori.

Our Mission

To assist Maori to excel in commerce and contribute to the successful economic development of Maori.

Our Shared Values

Ma te tika, ma te pono, me te aroha.

Reflecting integrity, truth and underlying respect for people

Our Strategic Plan

The strategic plan of Ngā Kaitatau Māori o Aotearoa is closely linked with the services provided to members. Below you will find an outline of the strategies adopted by Ngā Kaitatau Māori o Aotearoa to fulfill its goals:

Members

- Develop and maintain a national support network for members through the regional bodies, where established
- Develop a diverse membership base
- Encourage regional bodies to grow and develop
- Organise a national hui-a-tau
- Coordinate PD sessions of national interest for members through regional bodies where appropriate
- Promote the use of te reo Maori me nga tikanga Maori

Maori in Accounting

- Promote, encourage and support Maori into the profession
- Promote the advancement of Maori within the profession
- Promote academic and professional excellence such as prizes, scholarships and competition participation
- Lobby and advocate for Maori interests in the profession
- Educate the profession on relevant aspects of Maori culture
- Encourage research into Maori accounting and business related topics

Maori Economic Development

- Build the business and financial capabilities of Maori organisations
- Promote and increase members involvement in Maori economic organisations and initiatives
- Establish pathways for the growth of Maori economic leaders

²⁴ <http://www.nkmoa.co.nz> on April 2011. New Zealand flag courtesy of 4 International Flags at <http://www.33ff.com/flags/>

Appendix C Continued – General information about the National Maori Accountants Network of New Zealand²⁵**Relationships**

- Develop and maintain a strong and positive relationship with:
- New Zealand Institute of Chartered Accountants
- Tertiary institutions
- Key Maori stakeholders
- Other key stakeholders

Services**What We Do**

Ngā Kaitatau Māori o Aotearoa takes pride in offering meaningful benefits to its members and by accomplishing its goals. Below you will find an outline of services made available to members under the five pillars of the strategic plan:

Members

To provide meaningful opportunities that strengthen the development of Maori accountants by:

- establishing and maintaining a support network for its members
- organising professional development events for its members

Maori in Accounting

To increase the number of Maori and the understanding of kaupapa Maori in the profession by:

- encouraging Maori to consider a career in commerce
- promoting te reo Maori me nga tikanga Maori amongst its members and the profession

Maori Economic Development

To contribute to the growth and development of economic leaders and initiatives for Maori by:

- raising awareness of topical issues facing Maori accountants and Maori organizations
- providing avenues to access and the sharing of information

Relationships

To develop strategic relationships that advance our mission with organisations by:

- networking with other organisations with similar aspirations

²⁵ <http://www.nkmoa.co.nz> on 5 April 2011

Appendix D – General information about the Native American Finance Officers Association²⁶

The **Native American Finance Officers Association** builds the financial strength of tribal governments and their enterprises by providing educational forums and resources, and by instilling finance and accounting best practices. We are a national not-for-profit organization with members in positions such as tribal finance officers, controllers, treasurers, accountants, auditors, financial advisors, tribal leaders, and more.

NAFOA is unique because we focus solely on the financial success of tribal entities. We provide a central source for the latest in financial management information and professional idea sharing. Through our network, members connect with experts in various financial areas, specifically as they apply to tribal governments and organizations.

We believe that sound financial management strengthens tribal governments and organizations. This creates strong Native American communities now and for generations to come.

VISION

To strengthen tribal sovereignty through sound financial management.

MISSION

To improve the quality of financial and business management of tribal governments, their entities and their businesses.

GOALS

1. To create a network of financial and business management professionals serving tribes and their enterprises.
2. To provide the forum for financial and accounting information, training and technical assistance to tribes and their enterprises.
3. To educate members on legislation that impacts tribal financial management.
4. To develop and maintain financial standards and professional accounting and financial publications for tribes and their enterprises.
5. To support a scholarship and internship program for Native American students and tribal employees in financial and business professions.
6. To continue to participate as a member of the Government Accounting Standards Advisory Council to the Governmental Accounting Standards Board for input into generally accepted governmental accounting standards and they affect tribal governments.

²⁶ <http://www.nafoa.org/> on 5 April 2011. United States courtesy of 4 International Flags at <http://www.33ff.com/flags/>

Appendix E – Suggested approach to quantifying relevant content in submissions via “Keywords”

Low "Indigenous content" in the submissions to 20 March 2011 is reflected in the objective keyword count measure similar to approaches of Internet search providers. Google and Yahoo! have measures of relevancy, and below is a very simple version of such algorithms:

- Keywords per page
- Keyword counts

Both these measure help draw conclusions about how "materially" a submission addresses Indigenous issues and is it quite useful for this purpose.

In the data below, low content relating to Indigenous/Aboriginal keywords are quantified to 20 March 2011. Significant increases in submissions with Indigenous content can be seen in the data to 31 March 2011, after additional submissions relating to Indigenous Australians were prompted by the author.

Keyword Analysis - "Indigenous" and "Aboriginal" Indigenous Relevance - Keywords per Page	Submissions to 20th March 2011	
	No of Submission	% of Submissions
Original Submissions* - Keywords per Page		
High Indigenous content (>40 keyword)	1	1.4%
Medium Indigenous Content (11-40 keywords)	3	4.2%
Low Indigenous Content (1-10 keywords)	28	38.9%
No Indigenous Content (0 keywords)	40	55.6%
Total	72	100.0%
Keyword Analysis - "Indigenous" and "Aboriginal" Indigenous Relevance - Keywords Counts	Submissions to 20th March 2011	
	No of Submission	% of Submissions
Original Submissions* - Keyword Counts		
High (>10 keywords per page)	0	0.0%
Medium (2-10 keywords per page)	0	0.0%
Low (1-2 keywords per page)	4	5.6%
Insignificant/No (<=1 per page)	28	38.9%
None (0 keyword per page)	40	55.6%
Total	72	100.0%

Keyword Analysis - "Indigenous" and "Aboriginal" Indigenous Relevance - Keywords per Page	Submissions to 31st March 2011		Submissions to 20th March 2011	
	No of Submission	% of Submissions	No of Submission	% of Submissions
Post Draft Report Submissions** - Keywords per Page				
High Indigenous content (>40 keyword)	6	11.3%	1	2.1%
Medium Indigenous Content (11-40 keywords)	4	7.5%	4	8.5%
Low Indigenous Content (1-10 keywords)	18	34.0%	17	36.2%
No Indigenous Content (0 keywords)	25	47.2%	25	53.2%
Total	53	100.0%	47	100.0%
Keyword Analysis - "Indigenous" and "Aboriginal" Indigenous Relevance - Keywords Counts				
	No of Submission	% of Submissions	No of Submission	% of Submissions
Post Draft Report Submissions** - Keyword Counts				
High (>10 keywords per page)	3	5.7%	0	0.0%
Medium (2-10 keywords per page)	3	5.7%	1	2.1%
Low (1-2 keywords per page)	4	7.5%	4	8.5%
Insignificant/No (<=1 per page)	18	34.0%	17	36.2%
None (0 keyword per page)	25	47.2%	25	53.2%
Total	53	100.0%	47	100.0%

* Attachments to submissions are included treated in this analysis as separate additional submissions

** Note Keyword counts exclude seven mentioned in Recommendation 8.5 if that is restated in the Submission

Appendix E – Suggested approach to quantifying relevant content in submissions via “Keywords” – Evaluation and Ranking of Initial Submissions

Initial submissions (Prior to 20th March 2011)

Initial submissions (Prior to 20th March 2011)		Estimated Keyword Count				Estimated Keyword per Page		Comments	
No.	Individual / Organisation	Pages	Indigenous	Aboriginal	Keyword Total	Keyword Content	Keywords per Page		Keyword per Page Content
60	Department Education, Employment and Workplace Relations (PDF - 317 Kb)	60	75	2	77	High	1.28	Low	Government - Federal Security4Women - Sate Government Funded Government - State Advisory Council - Government - Federal NFP peak body of providersnote 7 of 10 keyword references are sold description
33	- Attachment 2 (PDF - 184 Kb)	30	22	10	32	Medium	1.07	Low	
45	Department of Corrective Services - WA (PDF - 58 Kb)	14	15	13	28	Medium	2.00	Low	
58	National Vet Equity Advisory Council (NVEAC) (PDF - 176 Kb)	8	11	1	12	Medium	1.50	Low	
	Jobs Australia (PDF - 294 Kb)	11							
44	- Attachment (PDF - 447 Kb)	18	9	1	10	Low	0.91	Insignificant	
34	Australian Education Union (PDF - 856 Kb) - see also submissiob DR101	127	0	9	9	Low	0.50	Insignificant	
23	Minerals Council of Australia (PDF - 111 Kb)	17	4	0	4	Low	0.24	Insignificant	
28	Australian Institute of Welfare and Community Workers Inc (PDF - 302 Kb)	16	4	0	4	Low	0.25	Insignificant	
57	NSW Government (PDF - 636 Kb)	28	0	3	3	Low	0.11	Insignificant	
55	Community Services and Health Industry Skills Council (PDF - 105 Kb)	7	0	3	3	Low	0.43	Insignificant	
53	Community Colleges Australia (PDF - 252 Kb)	12	1	1	2	Low	0.17	Insignificant	
3	- Attachment 2 (PDF - 74 Kb)	11	0	2	2	Low	0.18	Insignificant	
26	Department of Training and Workforce Development - WA (PDF - 27 Kb) #	5	2	0	2	Low	0.40	Insignificant	
38	NSW Community Services and Health (PDF - 41 Kb)	4	1	1	2	Low	0.50	Insignificant	
43	Department of Education and Training - NSW (PDF - 23 Kb)	4	0	2	2	Low	0.50	Insignificant	
13	- Attachment (PDF - 896 Kb)	127	1	0	1	Low	0.01	Insignificant	
48	Joint TAFE Associations' (PDF - 579 Kb)	68	1	0	1	Low	0.01	Insignificant	
33	- Attachment 1 (PDF - 759 Kb)	63	1	0	1	Low	0.02	Insignificant	
37	John Mitchell and Associates (PDF - 404 Kb) - see also submission DR102	50	1	0	1	Low	0.02	Insignificant	
9	The Gordon (PDF - 649 Kb)	28	1	0	1	Low	0.04	Insignificant	
31	ACTU (PDF - 152 Kb)	23	1	0	1	Low	0.04	Insignificant	
54	Department of Further Education, Employment, Science and Technology - SA	18	0	1	1	Low	0.06	Insignificant	
26	- Attachment 1 (PDF - 306 Kb)	14	1	0	1	Low	0.07	Insignificant	
39	Prof Erica Smith (PDF - 470 Kb)	14	1	0	1	Low	0.07	Insignificant	
12	Australian Nursing Federation (PDF - 234 Kb)	12	0	1	1	Low	0.08	Insignificant	
8	Innovation and Business Skills Australia (PDF - 86 Kb)	11	1	0	1	Low	0.09	Insignificant	
56	TVET Australia (PDF - 194 Kb)	10	1	0	1	Low	0.10	Insignificant	
13	Service Skills Australia (PDF - 423 Kb) #	8	1	0	1	Low	0.13	Insignificant	
46	Construction and Property Services Industry Skills Council (PDF - 195 Kb)	7	1	0	1	Low	0.14	Insignificant	
33	Women in Adult and Vocational Education (PDF - 202 Kb)	5	0	1	1	Low	0.20	Insignificant	
4	Queensland Tourism Industry Council (PDF - 391 Kb) %	3	1	0	1	Low	0.33	Insignificant	
32	Monash University (PDF - 677 Kb)	61	0	0	-	None	-	None	
51	- Attachment (PDF - 192 Kb)	29	0	0	-	None	-	None	
20	EE-OZ Training Standards (PDF - 267 Kb)	26	0	0	-	None	-	None	
49	Michael Minns Human Resource Pty Ltd (PDF - 693 Kb) %	25	0	0	-	None	-	None	
50	Australian Council for Private Education and Training (PDF - 272 Kb)	20	0	0	-	None	-	None	
35	Australian Vocational Education and Training Research Association (PDF - 212 Kb)	17	0	0	-	None	-	None	
51	South Australian Training and Skills Commission (PDF - 81 Kb) #	15	0	0	-	None	-	None	
52	National Quality Council - TVET (PDF - 196 Kb)	15	0	0	-	None	-	None	
22	Manufacturing Skills Australia (PDF - 424 Kb)	14	0	0	-	None	-	None	
19	ForestWorks (PDF - 92 Kb)	12	0	0	-	None	-	None	
47	New South Wales Teachers Federation (PDF - 586 Kb) %	12	0	0	-	None	-	None	
25	Electrical and Communications Association (PDF - 64 Kb)	10	0	0	-	None	-	None	
18	Tafe Development Centre (PDF - 107 Kb)	9	0	0	-	None	-	None	
26	- Attachment 2 (PDF - 221 Kb) - Same as submission 5	9	0	0	-	None	-	None	
5	Polytechnic West (PDF - 513 Kb) % - Same as attachment 2 of submission 26	8	0	0	-	None	-	None	
14	Australian Industry Group (PDF - 107 Kb)	8	0	0	-	None	-	None	
3	Carol O'Donnell (PDF - 43 Kb)	7	0	0	-	None	-	None	
29	Skills Tasmania (PDF - 42 Kb)	7	0	0	-	None	-	None	
30	Growcom (PDF - 185 Kb) #	7	0	0	-	None	-	None	
1	- Attachment (PDF - 855 Kb) %	6	0	0	-	None	-	None	
41	Industry Skills Councils (PDF - 172 Kb)	6	0	0	-	None	-	None	
3	- Attachment 1 (PDF - 42 Kb)	5	0	0	-	None	-	None	
24	Chamber of Commerce and Industry - QLD (PDF - 189 Kb)	5	0	0	-	None	-	None	
26	- Attachment 3 (PDF - 33 Kb)	5	0	0	-	None	-	None	
27	Mathematical Association of Victoria (PDF - 55 Kb)	5	0	0	-	None	-	None	
59	Skills Australia (PDF - 31 Kb)	5	0	0	-	None	-	None	
6	Rod Bauer (PDF - 45 Kb)	4	0	0	-	None	-	None	
11	Victoria University (PDF - 350 Kb)	4	0	0	-	None	-	None	
2	Elizabeth Bedson (PDF - 33 Kb) #	3	0	0	-	None	-	None	
10	Dr Robert Dalitz (PDF - 80 Kb)	3	0	0	-	None	-	None	
15	Dr Peter Ryan (PDF - 343 Kb)	3	0	0	-	None	-	None	
16	Lynn Saunders (PDF - 19 Kb)	3	0	0	-	None	-	None	
17	Allison Blake (PDF - 71 Kb) *	3	0	0	-	None	-	None	
21	Vanessa Ellis (PDF - 201 Kb) #	3	0	0	-	None	-	None	
36	H2O Pro Pty Ltd (PDF - 152 Kb)	3	0	0	-	None	-	None	
42	ACCI (PDF - 161 Kb) %	3	0	0	-	None	-	None	
7	The Deaf Society of NSW (PDF - 117 Kb)	2	0	0	-	None	-	None	
40	Charles Darwin University (PDF - 20 Kb)	2	0	0	-	None	-	None	
1	Children and Families Research Centre (PDF - 42 Kb) #	1	0	0	-	None	-	None	
33	- Attachment 3 (PDF - 43 Kb)	1	0	0	-	None	-	None	

Appendix E – Suggested approach to quantifying relevant content in submissions via “Keywords” – Evaluation and Ranking of Post-draft report Submissions

Post-draft report submissions (prior to 20th March 2011)			Estimated Keyword Count							Estimated Keyword per Page	
No.	Individual / Organisation	Pages	Indigenous	Aboriginal	Keyword Total	Recommendation 8.5 Included in word count	Deduct "7" Keyword counts for Recommendation 8.5	Adjusted Keyword Total	Keyword Content	Keywords per Page	Keyword per Page Content
DR75	NVEAC (PDF - 1378 Kb)	77	60	2	62	Y	7	55	High	0.7	Insignificant
DR105	Western Australian Government (PDF - 720 Kb) %	9	9	14	23	Y	7	16	Medium	1.8	Low
DR94	Joint submission by Victorian TAFE Association and TAFE Directors Australia (PDF - 221 Kb)	13	21	1	22	Y	7	15	Medium	1.2	Low
DR82	NSW Government (PDF - 722 Kb) %	12	20	1	21	Y	7	14	Medium	1.2	Low
DR89	Australian Vocational Education and Training Research Association (PDF - 540 Kb)	43	13	0	13	N	0	13	Medium	0.3	Insignificant
DR87	TVET Australia (PDF - 479 Kb)	15	15	0	15	Y	7	8	Low	0.5	Insignificant
DR81	Polytechnic West (PDF - 30 Kb)	4	7	0	7	N	0	7	Low	1.8	Low
DR68	Bob Boughton (PDF - 16 Kb)	1	6	1	7	N	0	7	Low	7.0	Medium
DR62	Carol O'Donnell (PDF - 79 Kb)	20	1	2	3	N	0	3	Low	0.2	Insignificant
DR90	Business SA (PDF - 1040 Kb) %	5	10	0	10	Y	7	3	Low	0.6	Insignificant
DR102	John Mitchell and Associates (PDF - 217 Kb) - Supplementary to submission 37	23	2	0	2	N	0	2	Low	0.1	Insignificant
DR80	Australian Council of Trade Unions (PDF - 132 Kb)	17	2	0	2	N	0	2	Low	0.1	Insignificant
DR92	TAFE Development Centre (TDC) (PDF - 653 Kb)	14	9	0	9	Y	7	2	Low	0.1	Insignificant
DR64	Gavin Moodie (PDF - 48 Kb)	12	2	0	2	N	0	2	Low	0.2	Insignificant
DR88	The Australian Industry Group (PDF - 182 Kb)	12	9	0	9	Y	7	2	Low	0.2	Insignificant
DR63	Kalgrove Ltd (PDF - 113 Kb)	6	2	0	2	N	0	2	Low	0.3	Insignificant
DR97	Aged and Community Services Australia (PDF - 92 Kb)	4	2	0	2	N	0	2	Low	0.5	Insignificant
DR79	Phil Toner (PDF - 263 Kb)	49	1	0	1	N	0	1	Low	0.0	Insignificant
DR107	Australian Council of Deans of Education (PDF - 642 Kb)	20	1	0	1	N	0	1	Low	0.1	Insignificant
DR85	Health and Community Services Workforce Council (PDF - 168 Kb)	13	0	1	1	N	0	1	Low	0.1	Insignificant
DR98	Australian Council for Private Education and Training (PDF - 369 Kb) - Supplementary to submission 50	11	8	0	8	Y	7	1	Low	0.1	Insignificant
DR76	National Quality Council (PDF - 179 Kb)	9	8	0	8	Y	7	1	Low	0.1	Insignificant
DR91	Enterprise RTO Association (ERTO) (PDF - 1743 Kb)	64	7	0	7	Y	7	0	None	-	None
DR73	Service Skills Australia (PDF - 636 Kb)	30	0	0	0	N	0	0	None	-	None
DR65	Melbourne Graduate School of Education (PDF - 1178 Kb) %	16	0	0	0	N	0	0	None	-	None
DR101	Australian Education Union (PDF - 193 Kb) % - Supplementary to submission 34	16	0	0	0	N	0	0	None	-	None
DR86	Community Services and Health Industry Skills Council (PDF - 410 Kb)	11	0	0	0	N	0	0	None	-	None
DR106	Community and Public Sector Union - State Public Services Federation (PDF - 59 Kb)	8	0	0	0	N	0	0	None	-	None
DR74	Innovation and Business Skills Australia (PDF - 43 Kb)	5	0	0	0	N	0	0	None	-	None
DR95	Australian College of Educators (PDF - 145 Kb)	5	0	0	0	N	0	0	None	-	None
DR77	Australian Institute of Welfare and Community (PDF - 151 Kb)	4	0	0	0	N	0	0	None	-	None
DR96	ForestWorks (PDF - 200 Kb) - Supplementary to submission 19	4	0	0	0	N	0	0	None	-	None
DR100	Skills Australia (PDF - 43 Kb) - Supplementary to submission 59	4	0	0	0	N	0	0	None	-	None
DR84	Valentina Luckus (PDF - 33 Kb)	3	0	0	0	N	0	0	None	-	None
DR93	QTU Cairns TAFE Branch (PDF - 106 Kb)	3	0	0	0	N	0	0	None	-	None
DR99	Flexible Learning Advisory Group (PDF - 83 Kb)	3	0	0	0	N	0	0	None	-	None
DR104	Community Colleges Australia (PDF - 209 Kb) - Supplementary to submission 53	3	0	0	0	N	0	0	None	-	None
DR61	Career Industry Council of Australia (PDF - 2 Kb)	2	0	0	0	N	0	0	None	-	None
DR67	Master Builders Australia Ltd (PDF - 630 Kb) %	2	0	0	0	N	0	0	None	-	None
DR69	National Centre for Vocational Education Research (NCVER) (PDF - 100 Kb)	2	0	0	0	N	0	0	None	-	None
DR78	EF-QZ Training Standards (PDF - 279 Kb)	2	0	0	0	N	0	0	None	-	None
DR66	Jill Marley (PDF - 14 Kb)	1	0	0	0	N	0	0	None	-	None
DR70	Australian Bureau of Statistics (ABS) (PDF - 10 Kb)	1	0	0	0	N	0	0	None	-	None
DR71	Suzanne Meehan (PDF - 77 Kb) %	1	0	0	0	N	0	0	None	-	None
DR72	Frank Doherty (PDF - 20 Kb)	1	0	0	0	N	0	0	None	-	None
DR83	Australian Nursing Federation (PDF - 46 Kb)	1	0	0	0	N	0	0	None	-	None
DR103	Jeff Walker (PDF - 26 Kb)	1	0	0	0	N	0	0	None	-	None
Post-draft report submissions (after 20th March 2011 Analysis)			Estimated Keyword Count							Estimated Keyword per Page	
No.	Individual / Organisation	Pages	Indigenous	Aboriginal	Keyword Total	Recommendation 8.5 Included in word count	Deduct "7" Keyword counts for Recommendation 8.5	Adjusted Keyword Total	Keyword Content	Keywords per Page	Keyword per Page Content
DR111	Adrian Williams (PDF - 26 Kb) - Supplement to submission DR108	7	51	0	51	N	0	51	High	7.3	Medium
DR108	Adrian Williams (PDF - 40 Kb)	6	47	0	47	N	0	47	High	7.8	Medium
DR113	ANZ (PDF - 50 Kb)	4	43	3	46	N	0	46	High	11.5	High
DR109	Benson Saulo (PDF - 156 Kb)	3	38	6	44	N	0	44	High	14.7	High
DR112	Andrew McIntosh (PDF - 29 Kb)	2	10	13	23	N	0	23	High	11.5	High
DR110	Department of Education, Employment and Workplace Relations (PDF - 157 Kb) *	12	11	0	11	Y	7	4	Low	0.3	Insignificant

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²⁷ <https://www.cpaaustralia.com.au/cps/rde/xchg/cpa-site/hs.xsl/terms.html> on 5 April 2011