



24 April 2024

By email: ApprenticeshipsReview@dewr.gov.au

DCA submission in response to Strategic review of the Australian Apprenticeships Incentive System

Dear Justice Iain Ross AO and Lisa Paul AO PSM,

Thank you for the opportunity to provide comment on the Strategic review of the Australian Apprenticeships Incentive System (the Review).

Diversity Council Australia (DCA) is the independent not-for-profit peak body leading diversity and inclusion in the workplace. We have over 1,300 member organisations, employing over 2 million Australians, representing almost 20% of the Australian workforce.

Given our focus on workplace inclusion and diversity, DCA can provide comment on the current system's capacity to encourage women, First Nations people, people with disability and other diverse groups to take up apprenticeships and traineeships. DCA strongly supports the Review's intent to explore the alignment between the Incentive System and the priorities outlined in the government's Employment White Paper, *Working Future*, and the government's broader economic objectives, particularly those relating to diversity and inclusion of underrepresented groups. We believe that addressing the challenges faced by many from these groups when considering apprenticeships/traineeships, and barriers that exist once they enter into one, will contribute significantly towards the government's objectives. These objectives are captured by its vision statement: *a dynamic and inclusive labour market in which everyone has the opportunity for secure, fairly paid work and people, businesses and communities can be beneficiaries of change and thrive.*

A note on language:

DCA recognises that a diversity of terms is used to describe people's lived experience. We recognise and respect an individual's right to identify with terms that they feel most comfortable with. We also recognise the limitations of binary language. However, sometimes binary categories have very real effects on peoples' experiences and may be necessary to convey the gendered nature and dynamics of our society.

DCA recognises that language is socially constructed and constantly evolving and our intention is always to be inclusive and to be open to change.

A note on intersectionality:

DCA recommends an intersectional approach when developing and implementing policy and programs. Intersectionality refers to how some people experience compounded discrimination due to multiple marginalising and interlinked characteristics.ⁱⁱ An intersectional lens on the lived

experience of the diversity of women, Aboriginal and/or Torres Strait Islander people, people with disability and other diverse groups will add significant value to inform the development of policies and programs to support greater diversity and inclusion in apprenticeships and traineeships.

Comment:

DCA's submission will focus on two of the areas within the scope of the Review; **4 and 5** below:

1. consider the effectiveness and efficiency of the Incentive System, against the objectives of encouraging take-up and completion of apprenticeships and traineeships, and examine the complementary role of services, support and high-quality training provision;
2. consider how cost of living pressures are impacting apprenticeship and traineeship take-up and completion in the current economic context, taking into account incentives and support from the Commonwealth, States and Territories;
3. take a holistic view of the apprenticeship system, including non-financial supports provided through the Australian Apprenticeship Support Network and by States and Territories and factors relating to workplace conditions, culture and the role employers play in the quality of apprenticeships and traineeships. The Review will also identify any systemic impediments to the effective operation of the Incentive System, including barriers to completions;
4. **consider the effectiveness of the Incentive System and associated services and support in creating training environments that encourage the take up and completion of apprenticeships and traineeships by women and people who face additional barriers to undertaking training (including people in rural, regional and remote areas and First Nations peoples); and**
5. **explore alignment between the Incentive System and priorities in the 2023 Employment White Paper and the Government's broader economic objectives, including the promotion of lifelong learning; opportunities, levers and initiatives beyond the Incentive System to encourage employers to take on more apprentices and encourage them to provide people who are underrepresented and lack opportunities, with more experience in the workplace at both pre-apprentice or apprentice/trainee level, particularly in areas of high and emerging skills needs.**

1. Take up and completion of apprenticeships and traineeships by women and people who face additional barriers to undertaking training

Recently, the Women's Economic Equality Taskforceⁱⁱⁱ concluded that despite some progress over recent years, Australian **women** still face deep and broad-ranging gender inequality and continue to shoulder a disproportionate burden of unpaid labour across all spheres of life. Entrenched and rigid gender norms and enduring bias persists, and women with intersecting identities and experiences face even greater barriers and disadvantages. The Taskforce found that Australia is underutilizing 50% of its economic potential. Amongst several reasons for this is our gender segregated economy.

DCA's research^{iv} and engagement with our members confirm the persistence of systemic and social barriers for women at work. These barriers also exist within the context of traineeships and apprenticeships. Access to affordable early childhood education and care, the unequal share of unpaid care between men and women, traditional gender norms and discriminatory attitudes, occupational segregation and gender-based violence are some of the key barriers we identified for women. Additional challenges and barriers exist for women who experience compounded

marginalisation: culturally and racially marginalised (CARM) women, Aboriginal and/or Torres Strait Islander women, women with disability, LGBTIQ+ women, to name a few.

These barriers exist for women in all industries and segments of the labour market however are particularly potent when coupled with the persistence of traditional gender norms and stereotypes about the kinds of jobs that are appropriate for women. DCA strongly supports all recommendations made by the Women's Economic Equality Taskforce and notes that recommendation 4^v is to provide women with *lifelong, accessible, flexible and affordable education and skill building ... remove existing disincentives and inequities that perpetuate industry and occupational segregation and sustained pay and wealth gaps.*

The provision of childcare services close by the place of work, and the availability of flexible arrangements in training and work, are basic strategies that can encourage take up and completion rates of apprenticeships and traineeships by women. The physical environment should be able to accommodate the needs of **women**, and **people with disability**, such as accessible and appropriate bathrooms. Hybrid and flexible programs will encourage more **women, people with disability, Aboriginal and/or Torres Strait Islander people** to participate as they can accommodate other responsibilities into their daily routines. **Mature aged people** may also benefit.

More complex to achieve, but critically important, is the need to ensure the training/workplace environment is culturally and racially safe. This includes safety for **LGBTIQA+ people**. Providers and employers must be properly equipped to understand and appreciate the impacts of discrimination and racism.

Even more complex, and a longer term process, is challenging traditional gender norms of women's work, both in paid employment and unpaid care. In our response to the National Strategy to Achieve Gender Equality^{vi} consultation we surveyed our members, asking them about the underlying challenges for women's economic equality. In addition to parental leave, childcare and flexibility our members called out traditional gender norms concerning work and care.

Violence against women, whether this violence is family or domestic violence, or violence perpetrated against women in other contexts, is also a factor influencing the take up and completion of apprenticeships and training. Reports of domestic homicides and the recent violent stabbing event in Sydney which, it seems, specifically targeted women, only make women more apprehensive to enter into male dominated spaces. The importance of creating a safe work environment – both physically and psychologically/emotionally – is critical.

2. Alignment between the Incentive System and priorities in the 2023 Employment White Paper and the Government's broader economic objectives:

DCA made a detailed submission to the Employment White Paper in November 2022^{vii}, based on our research and evidence, including recommendations on reducing barriers and disincentives to work and improving labour market outcomes for those facing challenges such as **First Nations people, those who live in rural and remote areas, younger and older Australians, people with disability and those experiencing discrimination.**

In that submission we referred to a previous edition of our *Inclusion@Work Index* which has since been updated with DCA's *Inclusion@Work Index 2023-2024*^{viii}. This research is based on a nationally representative sample of 3,000 Australian workers. It found that in 2023-24, as in previous years, **Aboriginal and/or Torres Strait Islander workers, workers with disability, workers from non-Christian religious affiliation, and LGBTIQ+ workers** experience significantly higher levels of discrimination and/or harassment at work compared to workers from non-marginalised backgrounds.

Our *Inclusive Recruitment at Work*^{ix} report found that approximately 3.3 million Australians of



working age (16% of our total working-age population) are potential job seekers who want to work but are overlooked and underleveraged by employers. All are much more likely to belong to a marginalised group: **Aboriginal and/or Torres Strait Islander people, CARM people, carers, people with disability, people from lower socio-economic backgrounds and with lower formal education, transgender people, people over 55 and people under 25.**

If the government is to achieve its objectives as outlined in *Working Future*^x, this considerable untapped potential must be realised. There is a significant role here for the government's Apprenticeships Incentive System to play in attracting and retaining these underrepresented groups.

3. Removing barriers to apprenticeships and traineeships for marginalised groups:

DCA's research provides evidence into the experience of **Aboriginal and/or Torres Strait Islander workers** – *Gari Yala (Speak the Truth)*^{xi} – which steps out 10 'truths' to centre Aboriginal and/or Torres Strait Islander voices to create workplace inclusion. Implementing these in training and work environments will help encourage and retain First Nations people in apprenticeships and traineeships.

1. Commit to unearthing and acting on workplace truths – however uncomfortable this may be
2. Ensure any Aboriginal and Torres Strait Islander-related work is Indigenous led and informed
3. Develop organisational principles to make it clear how Indigenous community engagement and employment should work in practice
4. Focus on workplace readiness (cultural safety) rather than worker readiness
5. Recognise identity strain and educate non-Indigenous staff about how to interact with their Indigenous colleagues in ways that reduce this
6. Recognise and remunerate cultural load as part of an employee's workload
7. Consult with Indigenous staff on how to minimise cultural load while maintaining organisational activity
8. Focus on sustainable careers and career development, rather than just short-term appointments
9. Take action to address workplace racism
10. Look to high-impact initiatives – those that research shows are linked to better wellbeing and retention for Indigenous staff

In October 2023, DCA provided a submission^{xii} to the government responding to its review of the skills assessment process for workers seeking entry into Australia. We recommended a number of strategies to remove unnecessary barriers for **skilled migrants** such as prioritising lived experience in the assessment process, clarity and transparency in communications, building racial literacy in assessment authorities, to name a few. Removing some of these barriers will lead to greater fairness and equity whilst addressing the current skills shortages in Australia's workforce.

DCA's *Inclusive Recruitment at Work*^{xiii} report and *Racism at Work*^{xiv} report outline specific strategies to address barriers to employment for **marginalised groups**. For example, we provide an organisational framework for action in workplace environments with six 'keys' to eradicate racism in Australian workplaces:

1. Build racial literacy
2. Centre lived experience
3. Audit for racial equity
4. Remove racial bias in recruitment
5. Remove racial bias in recognition and reward
6. Create the capacity to call it out



We encourage the Review to further explore DCA's evidence-based resources to help create safe and supportive environments for diverse and marginalised groups seeking apprenticeships and traineeships. Some relevant resources are referenced at the end of this submission.

4. Recommendations:

DCA recommends the Review consider:

1. Prioritising and supporting all measures to address entrenched gender norms that persist in training and work environments to encourage more women into apprenticeships and traineeships
2. The complex intersectional experience of some applicants, particularly those experiencing compounded marginalisation
3. The critical importance of building cultural and racial literacy amongst trainers, employers and employees to provide safety for applicants considering apprenticeships/traineeships and during their apprenticeship/traineeship
4. The critical importance of providing a training/work environment free from harassment and violence
5. Practical measures to remove barriers such as access to affordable early childhood education and care, located close by; support for shared care arrangements; flexible and/or hybrid programs and work; access to appropriate facilities eg. changerooms, toilets
6. The need for programs and workplaces to take active steps to address and remove barriers and challenges for diverse groups such as those outline in DCA's reports: *Gari Yala*, *Racism@Work*, *Inclusive Recruitment at Work*
7. Ongoing monitoring of the applicant experience, including the collection of disaggregated intersectional data to assess the progress of applicants from marginalised backgrounds.

5. DCA research and resources relevant to this discussion:

Women's economic inequality:

- [She's Price\(d\)less - 2022 update report - Diversity Council Australia \(dca.org.au\)](https://www.dca.org.au/reports/she-price-less-2022)

This report is the fourth in a series of reports prepared in conjunction with the Workplace Gender Equality Agency (WGEA) based on econometric modelling applied to data from the Household, Income and Labour Dynamics in Australia Survey. The report also used data from WGEAs workplace survey and ABS data.

Inclusive workplaces:

- [Inclusion@Work Index 2023-2024](https://www.dca.org.au/reports/inclusion-work-index-2023-2024)
- [The Case for Inclusion@Work - Diversity Council Australia \(dca.org.au\)](https://www.dca.org.au/reports/the-case-for-inclusion-work)
- [Inclusive Recruitment Tools - Diversity Council Australia \(dca.org.au\)](https://www.dca.org.au/reports/inclusive-recruitment-tools)
- [Inclusive Recruitment At Work - Diversity Council Australia \(dca.org.au\)](https://www.dca.org.au/reports/inclusive-recruitment-at-work)
- [Racism at Work - Diversity Council Australia \(dca.org.au\)](https://www.dca.org.au/reports/racism-at-work)
- [Gari Yala \(Speak the Truth\) Gendered Insights - Diversity Council \(dca.org.au\)](https://www.dca.org.au/reports/gari-yala)
- [The State of Flex in the Australian Workforce - Diversity Council \(dca.org.au\)](https://www.dca.org.au/reports/the-state-of-flex)

DCA has also made a number of relevant submissions:

- [Supporting women to achieve VET-based careers](https://www.dca.org.au/reports/supporting-women-to-achieve-vet-based-careers)
- [National Gender Equality Strategy - Diversity Council Australia \(dca.org.au\)](https://www.dca.org.au/reports/national-gender-equality-strategy)
- [Employment White Paper Response - Diversity Council Australia \(dca.org.au\)](https://www.dca.org.au/reports/employment-white-paper-response)
- [Work and Care Inquiry Submission - Diversity Council Australia](https://www.dca.org.au/reports/work-and-care-inquiry)
- [Response to Establishing a Disability Employment Centre of Excellence](https://www.dca.org.au/reports/response-to-establishing-a-disability-employment-centre-of-excellence)
- [Paid Parental Leave Amendment \(More Support for Working Families\) Bill 2023](https://www.dca.org.au/reports/paid-parental-leave-amendment)



- [Paid Parental Leave Amendment Bill 2022 - Diversity Council Australia \(dca.org.au\)](https://www.dca.org.au/paid-parental-leave-amendment-bill-2022)
- [ACCC Childcare Inquiry - Diversity Council Australia](https://www.dca.org.au/accg-childcare-inquiry)
- [Early Childhood education inquiry - Diversity Council Australia \(dca.org.au\)](https://www.dca.org.au/early-childhood-education-inquiry)

Please feel free to contact myself or Jacqueline Braw, Senior Advocacy and Government Relations Manager, on jacqueline@dca.org.au should you require any further information about this matter.

Yours sincerely



Lisa Annese
Chief Executive Office

ⁱ Commonwealth of Australia. Working Future. The Australian Government's White Paper on Jobs and Opportunities. September 2023.

ⁱⁱ Diversity Council Australia (V. Mapedzahama, F. Laffernis, A. Barhoum, and J. O'Leary). *Culturally and Racially Marginalised Women in Leadership: A framework for (intersectional) organisational action*, Diversity Council Australia, 2023. [CARM women in leadership - Diversity Council Australia \(dca.org.au\)](https://www.dca.org.au/carm-women-in-leadership)

ⁱⁱⁱ Women's Economic Equality: A 10-Year Plan to unleash the full capacity and contribution of women to the Australian economy, 2023. [Women's Economic Equality Final Report \(pmc.gov.au\)](https://www.pmc.gov.au/women-economic-equality-final-report)

^{iv} [DCA Research - Diversity Council Australia](https://www.dca.org.au/dca-research)

^v Women's Economic Equality: A 10-Year Plan to unleash the full capacity and contribution of women to the Australian economy, 2023. [Women's Economic Equality Final Report \(pmc.gov.au\)](https://www.pmc.gov.au/women-economic-equality-final-report)

^{vi} Diversity Council Australia National Strategy To Achieve Gender Equality Submission, April 2023. [national strategy to achieve gender equality dca submission.pdf](https://www.dca.org.au/national-strategy-to-achieve-gender-equality-dca-submission.pdf)

^{vii} Diversity Council Australia Employment White Paper Submission, November 2022. [Employment White Paper Response - Diversity Council Australia \(dca.org.au\)](https://www.dca.org.au/employment-white-paper-response)

^{viii} Diversity Council Australia (R. D'Almada-Remedios), Inclusion@Work Index 2023–2024: Mapping the State of Inclusion in the Australian Workforce Synopsis Report, Diversity Council Australia, 2024 [Inclusion@Work Index 2023-2024 - Diversity Council Australia \(dca.org.au\)](https://www.dca.org.au/inclusion-at-work-index-2023-2024)

^{ix} Diversity Council Australia (R. D'Almada-Remedios, A. Kaabel, and J. O'Leary), *Inclusive Recruitment: How to Tap into Australia's Overlooked and Underleveraged Talent*, Sydney, Diversity Council Australia, 2022 [Inclusive Recruitment At Work - Diversity Council Australia \(dca.org.au\)](https://www.dca.org.au/inclusive-recruitment-at-work)

^x Commonwealth of Australia. Working Future. The Australian Government's White Paper on Jobs and Opportunities. September 2023. [Working Future \(treasury.gov.au\)](https://www.treasury.gov.au/working-future)

^{xi} Diversity Council Australia/Jumbunna Institute (Brown, C., D'Almada-Remedios, R., Gilbert, J. O'Leary, J. and Young, N.) *Gari Yala (Speak the Truth): Centring the Work Experiences of Aboriginal and/or Torres Strait Islander Australians*, Sydney, Diversity Council Australia/Jumbunna Institute, 2020. [Gari Yala \(Speak the Truth\) - Diversity Council Australia \(dca.org.au\)](https://www.dca.org.au/gari-yala-speak-the-truth)

^{xii} Diversity Council Australia Submission [Skilled Migration Assessing Authorities - Diversity Council Australia \(dca.org.au\)](https://www.dca.org.au/skilled-migration-assessing-authorities)

^{xiii} Diversity Council Australia (R. D'Almada-Remedios, A. Kaabel, and J. O'Leary), *Inclusive Recruitment: How to Tap into Australia's Overlooked and Underleveraged Talent*, Sydney, Diversity Council Australia, 2022 [Inclusive Recruitment At Work - Diversity Council Australia \(dca.org.au\)](https://www.dca.org.au/inclusive-recruitment-at-work)

^{xiv} Diversity Council Australia (P. Anderson, V. Mapedzahama, A. Kaabel, and J. O'Leary) *Racism at Work: How organisations can stand up to and end workplace racism*, Diversity Council Australia, 2022. [Racism at Work - Diversity Council Australia \(dca.org.au\)](https://www.dca.org.au/racism-at-work)