

# Submission to Productivity Commission

*National Agreement for Skills and Workforce  
Development Review Interim Report*

July 2020

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## Introduction

The Queensland Nurses and Midwives' Union (QNMU) thanks the Productivity Commission for the opportunity to comment on the *National Agreement for Skills and Workforce Development Review Interim Report* (the 'Report').

Nursing and midwifery is the largest occupational group in Queensland Health (QH) and one of the largest across the Queensland government. The QNMU is the principal health union in Queensland covering all classifications of workers that make up the nursing and midwifery workforce including registered nurses (RN), midwives (RM), nurse practitioners (NP) enrolled nurses (EN) and assistants in nursing (AIN) who are employed in the public, private and not-for-profit health sectors including aged care.

Our more than 63,000 members work across a variety of settings from single person operations to large health and non-health institutions, and in a full range of classifications from entry level trainees to senior management. The vast majority of nurses in Queensland are members of the QNMU.

This year 2020 will be dedicated to celebrating the International year of the Nurse and the Midwife, in celebration of the 200th year anniversary of the birth of the founder of contemporary nursing, Florence Nightingale. The World Health Organisation (WHO) nominated Nurses and Midwives for their invaluable contribution to health care and to highlight the need for a strengthened Nursing and Midwifery workforce to achieve Sustainable Development Goals (SDG) and universal health coverage. The QNMU is proud to embrace this opportunity to invest in the Nursing and Midwifery professions, particularly the investment into minimum safe staffing ratios and skill mix across all health sectors.

The Vocational Education and Training (VET) system is a core component of nursing and aged care education. A significant proportion of the nursing and aged care workforce are trained and qualified through the VET system. It is therefore paramount that access to high quality education is not only equitable but maintained nation-wide through standardisation of practice. The QNMU believes that a strong and effective VET system must provide ample opportunity for developing lifelong transferrable skills to support ongoing employability and career progression.

The QNMU will present a set of recommendations and then address each Information request separately.

## Recommendations

The QNMU recommends:

- Increased government regulatory role in the VET market, including more stringent accreditation requirements of Registered Training Organisations (RTOs) and reviewing national standards for skill and knowledge competencies.
- Mandatory publishing of information regarding training course applicability to occupation and employment outcomes of graduates by RTOs.
- Nationally consistent workforce planning for integration at the federal and the state level, which acknowledges that there are state differences in the labour market.
- Skills and labour shortages information and available study subsidies publicised on the websites federal and state government, publicly funded RTO, unions, employer groups and other industry key stakeholders, and disseminated through the education sector.
- Increased government investment into schemes and programs aimed at supporting VET graduates to obtain and sustain employment after qualification is attained.
- Up-to-date and regular labour workforce audits and modelling of future demand and/or shortages for specific occupations, such as nursing and midwifery. Reports and findings must be widely accessible to the public.
- Weighted funding and subsidies according to rurality or remoteness scores that take into consideration the additional burden of cost for delivery courses in rural and remote locations.
- Relaxing of loan caps for graduates of any Certificate III course who have been unable to obtain employment, to enable them to undertake another Certificate III or above to maximise their employment opportunities.
- RTOs should be responsible for sourcing and providing appropriate work experience for their students.
- RTOs should provide onsite clinical facilitators for each placement site to enable students to have immediate and continuous access to clinical facilitators every day of their placement.
- Targeted strategies that support First Nations people to attain health and aged care qualifications to assist in closing the gap in health disadvantage among First Nations people.

- Clarification of what constitutes “non-controversial or minor change” to the proposed Training Package approval process change, clarification of which regulatory body will determine whether a matter is defined as such and how this will be determined, and clarification of how oversight will be maintained regarding such changes.
- Further consideration of the needs of rural and remote areas, especially in relation to the provision of courses and the availability of work experience and clinical placements for nursing and midwifery students.
- Expansion of online delivery methods for skills and workforce development in Australia, as long as such providers adhere to the same standards and undergo the same rigorous accreditation processes as traditional forms of teaching.
- Moving away from employer-driven skillsets that limit career progression opportunities and moving towards building and developing transferrable skills.
- RTOs must plan for infection control and personal hygiene practices, especially for VET courses for hospitality, aged care, community services, and other sectors that involve high levels of interaction with the public.
- Government to introduce mandatory training pre-requisites in the hospitality industry to complete hygiene and safety training, and for such training to extend to students enrolled in health and aged care, community services, and hospitality courses.
- RTOs to review emergency contingency plans for training delivery in the event of another pandemic or other natural disaster or health emergency.

### **Information request 1 – Role of Competition in the VET Market**

The QNMU believes that competition in the VET market must be subject to government regulation and oversight to ensure that providers and employers are held accountable, transparent and responsive to users’ needs. While market competition can allow greater sensitivity to rapidly changing economic needs and trends, this is more often to the benefit of providers and employers only. The needs of employers and users are different: while an employer requires a specific set of skills tied to a specific job role, users are at a greater advantage when they possess a broad range of transferrable skills that can be utilised across different occupations to facilitate career growth and development. However, training outcomes in a market-based approach are increasingly determined by the needs of the employer, rather than the user (Gekara & Snell, 2018), leaving prospective students with an

illusion of choice but limited learning outcomes. Students end up learning “units” tied to a work function rather than gaining overall mastery over a trade (Livock, 2018).

The Government must, therefore, play a larger regulatory role in the VET market, especially in the standardisation of course content in training programmes, to ensure that skills developed are not limited to a specific workplace or job but are transferrable across the wider scope of work and life. This is also required to ensure adequate coverage of skills and labour at federal and state levels. As noted in the Report, the issue of “thin markets” is difficult to address through market competition and is more suitably tackled through public providers. Public providers are also appropriate for benchmarking purposes, especially in terms of course quality and outcomes.

Furthermore, course outcomes must be measured not only in skills and knowledge acquired but also take into consideration employment outcomes, that is, the number of graduates who can secure jobs in the field they pursue, within the first 12 months of graduation. This will provide a more accurate snapshot of the performance standards of a provider.

### **Information request 2 – Career guidance for students**

To support a user-driven VET system approach to reform, potential students must be equipped with the capacity to make informed decisions regarding their choice of training course and provider.

Regardless of the type of provider or the method of training delivery, there must be clear information available regarding:

- The skills and knowledge necessary for workplace-readiness in general
- The skills and knowledge that employers expect from a graduate in order to perform a specific occupation
- Appropriateness and useability of coursework information and skills for a specific occupation
- Course completion rates
- Employment outcomes (number and percentage of graduates who secured jobs in their desired field within a specified timeframe)

This information should be broadly available and accessible to all levels of users, including for school-age students. For example, this information might be published on the Australian Skills and Quality Authority website, on [training.gov.au](http://training.gov.au), and on the individual RTO’s website.

Moreover, RTOs might consider work experience days for prospective students prior to enrolling in a VET course. This would enable prospective students to gain a better understanding of the work requirements of the job, introduce them to the working

environment, and assist in preventing debt accrued from students changing their minds about a career mid-way through a course.

### **Information request 3 – Designing a new intergovernmental agreement**

Discussions regarding reform to the VET sector must stay true to the intent of VET as a form of education with the purpose of skilling the workforce for employment. With this in mind, the QNMU believes it is important for the government to consider not only the quality and delivery of training courses, but to also provide adequate assistance at the employment level. This involves supporting users to gain employment, through mechanisms such as ensuring that training is of a standard necessary to obtain employment, so also in supporting users to sustain employment. Education must be viewed as a continuous process throughout a person's working life, and as such, this requires streamlining processes that integrate different education delivery methods and educational sectors. Education obtained through VET, higher education, and formal or informal on-the-job training must be recognised as adding to a user's work skills capabilities throughout their lifetime.

### **Information request 4 – Identifying and acting on skills shortages**

Workforce shortages are a significant area of concern on a national level, especially given that shortages in one sector may lead to knock-on effects in others. It is therefore imperative that the government takes a proactive approach to handling existing and predicted shortages. Regular and detailed labour workforce audits and modelling is a necessary method of measuring shortages, such as the reports published by the now-defunct Health Workforce Australia (HWA). Disappointingly, the vital work conducted by the HWA has not been continued by the Department of Health. Such reports are invaluable in identifying labour trends and shortages for workforce strategy planning.

For example, healthcare faces considerable nursing workforce shortages. By 2025, there is expected to be a deficit of over 100,000 nurses (Health Workforce Australia, 2014), especially in the aged care and mental health sectors. The aged care and mental health sectors have high proportions of Enrolled Nurses, which is a qualification attained through the VET Diploma of Nursing. However, participation figures for the Diploma of Nursing are low, in part due to the cost of the course. In Queensland, the average cost of the Diploma of Nursing is \$20,000 for full-fee students, subsidised to an average of \$12,000, depending on the location. Another reason for the low enrolment figures is the movement of employment opportunities out of the acute care sector (Department of Health, 2013). As a result of low participation, there is little support from the government to continue to support these places despite the shortages.

Furthermore, other factors leading to labour shortages in aged care more generally include:

- People viewing such work as a job and not a career

- Poor working conditions
- Lack of regulation and standardisation of practice
- Casualisation of the workforce
- Job insecurity
- Low pay
- Lack of support for professional development and opportunities

The above factors that contribute to labour shortages in the aged care sector must be addressed on a national level, supported by the VET sector. The VET sector is well-placed to upskill the aged care workforce and support the growth and improvement of aged care services (Aged Care Workforce Strategy Taskforce, 2018), achievable through ensuring that courses are fit for purpose and equip students with clear expectations of the job and the career.

The QNMU asserts that there must be nationally consistent workforce planning for integration at the federal and the state level, which acknowledges that there are state differences in the labour market. As outlined in the Aged Care Workforce Taskforce (2018), traditional neglect in workforce planning necessitates a national approach to labour to drive skills and training development.

Governments need to maintain a strong presence in market management, especially in relation to skills forecasts and shortages. This is of utmost importance given the current high rates of underemployment and unemployment (16.1%) among young Australians (Australian Bureau of Statistics, 2020), and the over-reliance on overseas workers to fill workforce gaps (Eastman, Charlesworth, & Hill, 2018). This is problematic for two reasons: firstly, it is producing a generation of under-skilled and underworked youth at a time when generationally, baby boomers are retiring at greater numbers than youth are entering the workforce. The vacancies generated by baby boomer generations require relatively high levels of skill (Dohm, 2000). Secondly, the COVID-19 pandemic has amplified the risks of seeking a skilled workforce outside of Australia to fill workforce vacancies, rather than investing in training Australians.

The QNMU recommends the government publicises skills shortages and available study subsidies on their website and further disseminate such information through the education sector, unions, employer groups and other industry key stakeholders. This will enable potential students to make informed decisions regarding where to invest their education and maximise their chances of successfully obtaining employment following graduation, as well as addressing labour shortages.

#### **Information request 5 – Simplification of subsidy groupings**



The QNMU believes that there must be reasonably consistent funding models in spite of the federated system. While the funding of subsidies should remain sensitive to the education and workforce needs of the states and territories, nationally consistent subsidies in the face of reduced discretion for state jurisdictions is of greater importance. It is unreasonable that potential students are financially disadvantaged due to differing levels of state subsidy on the basis of geographical location. Moreover, nationally consistent subsidies are a crucial way of ensuring consistent standards of course quality and cost, as RTOs across Australia will be equally supported.

However, it is equally important to consider weighting for geographical disadvantage. This is especially relevant for decentralised states such as Queensland, which bear a greater burden of cost due to the increased cost of course delivery in rural and remote locations. The system would thus benefit from weighted funding and subsidies according to rurality or remoteness scores as set by the Australian Statistical Geography Standard.

#### **Information request 6 – Impacts of vouchers**

The voucher system has been proposed in other sectors, such as aged care and education. However, it brings its own challenges with regards to ensuring consistent quality of service and access. Therefore, until there is substantial evidence-based research supporting its implementation, the QNMU does not believe it is a viable alternative.

#### **Information request 7 – Implementing an expanded loans scheme**

The QNMU is strongly in favour of expanding the loans scheme beyond its current eligibility criteria, for the purposes of supporting students to gain employment following graduation. For example, only 50% of those who complete their degree in the childcare sector are able to find employment in their desired field. In such cases, graduates may wish to undertake additional study to increase their employability but may have reached the cap on the current loans scheme, rendering them ineligible for a loan that covers the full cost of another course.

Moreover, the Australian workforce should be encouraged to undertake additional training and study to further develop and broaden their range of skills and knowledge. To support a well-educated workforce, the government must consider strategies that increase access to training, such as expanding loan schemes.

The QNMU recommends the relaxing of loan caps for graduates of any Certificate III course who cannot find employment, to enable them to undertake another Certificate III or above to maximise their employment opportunities.

**Information request 8, 9 – implementing new support arrangements for trade apprenticeships, assessing streamlining options**

No comment.

**Information request 10 – Employer incentives targeting disadvantaged groups**

The QNMU believes there must be targeted strategies that support First Nations people to attain health and aged care qualifications to assist in closing the gap in health disadvantage among First Nations people. Strengthening the First Nations health workforce within the community is a national priority that would benefit not only health outcomes in First Nations populations, but empower First Nations people to be engaged and involved in discussions about their own health. Such strategies could target specific employers, such as Queensland Health and the services within the National Aboriginal Community Controlled Health Organisation network.

**Information request 11 - Apprenticeship support network service delivery**

No comment

**Information request 12 – Flexibility allowed by training packages**

The QNMU expresses concern over the Commission’s proposal that flexibility may be introduced in the approval process of making changes to training package standards. Firstly, “non-controversial or minor change” must be clearly defined to avoid loose interpretations. In order to achieve this, what regulatory body will determine what constitutes a “non-controversial or minor change”? Secondly, there is a question of how oversight will be delivered and maintained regarding such changes: it is not acceptable that any committee may enact changes without an independent approval body.

There is a very real and serious risk that education and training requirements may become more closely aligned with the needs of the employers, rather than the needs of the student for professional development. Employers must not become the arbiters of what is appropriate training; instead, a broader understanding of what is needed within the industry should be the aim for all training packages.

The QNMU acknowledges that the Industry Reference Committees aim to include industry experts across a broad range of background, such as educators, providers, professional bodies, trade unions, however this must be strictly applied to ensure a consensus-based approach. Effective consultation across a broad spectrum of stakeholders is necessary to ensure that qualifications meet industry and social needs (Skiba, 2020).

### **Information request 13 – Pathways and transitions**

An area of serious concern is that students are expected to find their own placements for work experience. The QNMU believes that RTOs, as the teaching institution, should be responsible for finding appropriate work experience for their students to ensure that the workplaces are appropriate training sites, have adequate facilities and resources in which students can train, and employ staff who are competent to provide training and education. Not only will this ensure consistency of training among graduates, but also foster greater co-operation between RTOs and potential employers. Moreover, RTOs will have greater control over broadening the range of placements and types of work experiences that students have, which is crucial for developing a balanced set of skills (Aged Care Workforce Strategy Taskforce, 2018).

Secondly, the QNMU believes greater understanding between potential employers and graduates regarding work readiness and training would be beneficial. Employers must acknowledge that Certificate III graduates will have some degree of work readiness however also require ongoing support, mentorship, and professional development. Graduates should not be expected to have the same level of experience and skill as another worker who is more established in the field.

### **Information request 14 – Evidence about mentoring and pastoral support**

Mentoring and pastoral support are vital aspects of vocational training and should be made readily available to all students whether formally or informally. Nursing students (those enrolled in the Diploma of Nursing, Certificate III in Individual Support, and Certificate III in Aged Care) undertake practical placements under the supervision of nursing staff to support the development of skills. In addition, students are also guided by a clinical facilitator who assesses and monitors the student's practical skill competency. However, it is not appropriate or sufficient for clinical facilitators to be "shared" between multiple placement sites.

Therefore, the QNMU asserts that RTOs should provide onsite clinical facilitators for each placement site to enable students to have immediate and continuous access to clinical facilitators every day of their placement.

### **Information request 15 – Investment in public provision**

Queensland faces a major challenge in providing adequate coverage of skills and workforce development opportunities and programs, with 38% of the population living outside of metropolitan cities (Australian Bureau of Statistics, 2014) where the majority of training

programs are offered. The employment rate of people living outside of metropolitan areas is also lower (60% compared to 65% in Greater Brisbane) (Australian Institute of Health and Welfare, 2018). Skills and workforce development are therefore crucial in regional, rural and remote areas. However, private providers may find it unprofitable to operate in less populated areas and potential students may struggle to access training and education services.

The QNMU calls on the government to give further consideration of the needs of rural and remote areas, especially in relation to the provision of courses and the availability of work experience and clinical placements for nursing students. This is an area where active government intervention is required to meet the service needs and cannot be left to market forces. The QNMU welcomes funding models that support rural and remote skills development and expand access to services.

### **Information request 16 – The challenges of online delivery**

The QNMU supports the expansion of online delivery methods for skills and workforce development in Australia with a few caveats. Firstly, online-based education must adhere to the same standards and undergo the same rigorous accreditation processes as traditional forms of teaching.

Secondly, online-based education must be an appropriate form of teaching and must not disadvantage the student by virtue of being delivered online. For example, the Diploma Nursing requires face-to-face teaching hours in the form of placements to develop practical skills and experience. Research into existing nursing courses that contain an online delivery component have highlighted some of the weaknesses of online teaching. Nursing is a profession that requires a high degree of critical thinking and analysis, problem-solving, and interpretation. Such skills are difficult to teach or develop in an online environment without immediate and continuous feedback (Ryan, Gwinner, Mallan, & Livock, 2017). Students have also expressed a preference for practical demonstrations rather than theoretical demonstrations.

While some course content and theory may be suitable to online study, practical placements in person are an integral part of learning the skills necessary to fulfil the job requirements of being a nurse. Therefore, online delivery may only be suitable for parts of a course and must not be used to substitute practical components requirements.

In order to achieve a balance between elements suitable for online study and elements that must be delivered in person, it is necessary to consult with the Australian Nursing & Midwifery Accreditation Council (ANMAC) and the Nursing and Midwifery Board of Australia (NMBA)

regarding the clinical and practice experience needs during training. This will support an informed view about job requirements to ensure graduates are workplace ready.

### **Information request 17 – Impacts of COVID-19**

The post COVID-19 landscape is projected to be characterised by limited career development opportunities and additional employment competition. It is therefore more important now than ever to address the employability of graduates in relation to VET courses, especially in relation to ensuring that graduates are workplace ready. Generation Z (those currently under 25 years of age, therefore including high schoolers and recent school leavers) are predicted to experience 6 career changes in their lifetime (McCrimdell Research, 2018); building and developing transferrable skills is thus of equal importance to learning an occupational skillset. VET courses and providers must therefore move away from narrow employer-driven skillsets that limit career progression opportunities available to graduates (Sheldon & Thornthwaite, 2005).

In terms of the current impact of COVID-19, the QNMU recommends that all RTOs must plan for infection control and personal hygiene practices. Moreover, we support the call for the government to implement mandatory training pre-requisites in the hospitality industry to complete hygiene and safety training, as recommended by the United Workers Union's *Re-opening the hospitality industry* (2020), however we would extend this recommendation to students enrolled in VET courses such as health and aged care, community services, and other sectors that involve high levels of interaction with the public, in addition to hospitality.

Lastly, the QNMU suggests RTOs review emergency contingency plans for training delivery, such as the ability to move coursework to online delivery, or how to facilitate work experience placements. This will enable smooth transitions to teaching methods with minimal disruption to studies and allow students to complete coursework or graduate on time, thus maximising the labour workforce potential and reduce the risk of financial disadvantage.

### **References**

Aged Care Workforce Strategy Taskforce. (2018). *A matter of care: Australia's aged care workforce strategy*. Canberra: Commonwealth of Australia.

Australian Bureau of Statistics. (2014). *Regional Population Growth, Australia, 2012-13*. Retrieved from <https://www.abs.gov.au/AUSSTATS/abs@.nsf/DetailsPage/3218.02012-13>

Australian Bureau of Statistics. (2020). *6202.0 - Labour Force, Australia, May 2020*. Retrieved from Australian Bureau of Statistics:

<https://www.abs.gov.au/ausstats/abs@.nsf/7d12b0f6763c78caca257061001cc588/a8e6e58c3550090eca2582ce00152250!OpenDocument>

Australian Institute of Health and Welfare. (2018). *Australia's health 2018*. Canberra: AIWA.

Department of Health. (2013). *Review of Government government health workforce programs: 7.1 Nursing and midwifery education*. Retrieved from Department of Health:

<https://www1.health.gov.au/internet/publications/publishing.nsf/Content/work-review-australian-government-health-workforce-programs-toc~chapter-7-nursing-midwifery-workforce%E2%80%93education-retention-sustainability~chapter-7-nursing-midwifery-education>

Dohm, A. (2000). Gauging the labor force effects. *Monthly Labor Review*, 17-25.

Eastman, C., Charlesworth, S., & Hill, E. (2018). *FACT SHEET 1: Migrant Workers in Frontline Care*. Retrieved from <https://www.arts.unsw.edu.au/sites/default/files/documents/Migrant%20Workers%20in%20Frontline%20Care.pdf>

Gekara, V., & Snell, D. (2018). Designing and delivering skills transferability and employment mobility: the challenges of a market-driven vocational education and training system. *Journal of Vocational Education & Training*, 70(1), 107-129. doi:10.1080/13636820.2017.1392996

Health Workforce Australia. (2014). *Australia's future health workforce - nurses*. Canberra: Commonwealth of Australia.

Livock, C. (2018). Re-humanization of vocational education and training in Australia. *Journal of Critical Realism*, 17(1), 63–77. doi:10.1080/14767430.2017.1372655

McCrinkle Research. (2018). *Australia in 2020: A Snapshot of the Future*. Retrieved from <https://mccrinkle.com.au/wp-content/uploads/2018/04/Australia-in-2020-A-Snapshot-of-the-Future.pdf>

Ryan, M., Gwinner, K., Mallan, K., & Livock, C. (2017). Preparing work-ready nurses: reflexive learning for diverse students in the Australian vocational education and training sector. *Studies in Continuing Education*, 39(3), 268–285. doi:10.1080/0158037X.2017.1279136

Sheldon, P., & Thornthwaite, L. (2005). Employability skills and vocational education and training policy in Australia: An analysis of employer association agendas. *Asia Pacific Journal of Human Resources*, 43(3). Retrieved from <https://journals.sagepub.com/doi/10.1177/1038411105059100>

Skiba, R. (2020). Rationalization in Australian Vocational Education and. *International Journal of Vocational Education and Training*, 6(1), 17-27. doi:10.11648/j.ijvetr.20200601.13

United Workers Union. (2020). *Re-opening the hospitality industry*. Brisbane. Retrieved from [https://www.unitedworkers.org.au/wp-content/uploads/2020/07/UWU-Re-opening-the-Hospitality-Industry-Position-Paper\\_11052020.pdf](https://www.unitedworkers.org.au/wp-content/uploads/2020/07/UWU-Re-opening-the-Hospitality-Industry-Position-Paper_11052020.pdf)