



Australian Manufacturing Workers' Union

**Submission in Response
Apprenticeships for the 21st Century Expert Panel**

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1. Introduction

The Australian Manufacturing Workers' Union (AMWU) welcomes the opportunity to make this contribution in response to the Report of the Australian Apprenticeships for the 21st Century Expert Panel (the Panel) '*A Shared Responsibility*'.

The AMWU represents the interests of over 120,000 Australian manufacturing workers employed in a wide range of manufacturing, engineering and related industries including workers engaged in food processing, metal & engineering, printing, vehicle and technical, supervisory and administrative occupations.

Manufacturing workers across all occupations, including production, trade, technical and para-professional, more than many others, rely on the quality and portability of their skills for their livelihood. The structures for the delivery, recognition and credentialing of skills, and in particular the apprenticeship model, are therefore of critical importance to them.

The AMWU is Australia's principal union for (but not limited to) skilled trades and has had a long standing, committed and productive involvement in vocational education and training on behalf of all of its members for many years.

We provide representation at all levels of the system including involvement in advisory bodies at both state and national levels, on a variety of state and territory regulatory bodies, and also, importantly, in the network of Industry Skills Councils.

2. Context for this Submission

The AMWU submits that there are many weaknesses associated with the VET and apprenticeships systems in Australia which we summarise as follows:

- There is often a disconnect between the training delivered and the skills requirements associated with employment in a job, that is the training is not really vocational.
The role of VET, in our submission, is to provide an individual with the skills and knowledge required to effectively carry out the work associated with a vocation to the standard required in employment.
The role therefore of apprenticeships is to provide the apprentice with the skills and knowledge required to effectively carry out the work associated with trade vocation to which they are apprenticed to the standard required in employment
- Attempts to exploit VET for other non-vocational purposes are compromising both the fitness for purpose of VET and the integrity of the Australian Qualifications Framework.
- A lack of will on the part of training regulators to effectively police compliance with national and vocational standards is widening the divide between training and vocational relevance;
- A lack of action on the part of governments to properly structure subsidy and incentive schemes to support strategically important qualifications for vital occupations is weakening the apprenticeship system;
- The ideologically driven push for a deregulated and fully contestable training market based on a so-called 'student entitlement' which would effectively operate

in the interests of training providers is taking precedence over the need to manage training delivery and workforce development in the national interest;

- Declining quality of training delivery and outcomes is damaging the VET and apprenticeships brand;
- Declining apprenticeship completions are a wasted participation and productivity opportunity for the economy;
- Pressure for fully institutional delivery of key trade, technical and production qualifications is undermining the quality of outcomes and compromising labour mobility and productivity; and,
- Poor pay and conditions for apprentices are a clear impediment to apprenticeship commencements and therefore may represent the biggest impediment to apprenticeship completions.

The training system's focus on training people in the skills they need to perform work in a job is diminishing, and is instead gravitating to training them in foundation skills that lack vocational relevance, and application.

The apprenticeship model, criticised by some in the training sector as lacking flexibility and being bureaucratic, continues to enjoy strong support from both apprentices and employers, whose views should not be buried in an esoteric debate about pedagogy.

The AMWU submits that the restructuring of the eighties and nineties was meant to place skills formation at the centre of the industrial relations system however a succession of free market oriented policy decisions by governments has resulted in the emergence of a training market whose goal is profit.

The AMWU therefore welcomes the Report of The Panel as an important contribution to the debate about how Australia confronts the productivity, labour mobility and skill related capacity constraints currently challenging the economy.

Expert Panel Recommendations

The AMWU, in general terms, supports the 14 recommendations of the Panel. In particular we strongly support those recommendations that go to:

- The establishment of a National Custodian of the Apprenticeship System:
- The establishment of a Employer Contribution Scheme:
- The conduct of a broad review of apprenticeship provisions, wages and conditions:
- Clarifying the roles and consolidating the number of stakeholders in the system
- Increasing the quality and consistency of pre-vocational & pre-apprenticeship programs; and,
- Improving the regulation and quality of VET in Schools

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| <ol style="list-style-type: none">1. Establish a National Custodian to oversee reform that will ensure Australia has a high quality Australian Apprenticeships system that:<ul style="list-style-type: none">• responds to the needs of the economy;• supports nationally consistent standards for employment and training of |
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apprentices and trainees;

- focuses on retention and completion of apprentices and trainees;
- supports high quality skill development to ensure all apprentices and trainees have well rounded and highly respected skills required by the economy.

As a first step an independent taskforce should be established to work with the eight jurisdictions to align their systems and develop a framework and process for the establishment of the National Custodian.

The taskforce would be led by an independent chair and have a representative from each state and territory government, a union and an employer group.

AMWU Observations:

- The apprenticeship system is not simply another form of education and training. It is undoubtedly the most vocationally direct and fit-for-purpose model for the development of skills for work. The AMWU believes therefore that industry must take the leading role in the system rather than the training delivery market.
- The AMWU strongly supports the establishment of a National Custodian of the Apprenticeship System. The system as it stands is riddled with inconsistent approaches that compromise the efficiency of the system.
- A National Custodian provides an opportunity to rectify the often inconsistent approaches by different jurisdictions to the declaration of vocations that are 'Trades' and bureaucratic impediments to mobility across state and territory borders.
- The vocations that are recognised as 'Trades' are essentially national in character as are the industries in which they are employed. It makes sense to have national leadership of the administration of the apprenticeship system.
- We submit that the status and value that the community attaches to trades would be enhanced, as would the level of understanding of the distinction between 'trade apprenticeships' and 'traineeships', if the practice of issuing "Trade Papers" were re-instituted.
- The practice in recent years has been to align apprenticeships and traineeships to a qualification outcome rather than aligning it to the vocation or occupation the person is apprenticed to.

This has encouraged qualification developers and RTO's to seek to have qualifications approved for use in Training Contracts rather than be forced to 'align' the qualification to the vocation that is meant to be the result.

This has resulted in many cases in a lack of alignment and poor quality outcomes where the person trained is not fit for the vocation they have been trained in.

This has also led to a proliferation of traineeships that are, in our view, vehicles for funding for qualifications rather than employment and training based methods of producing skilled workers

- In supporting the establishment of a National Custodian, the AMWU urges care in the design of the structure, roles and responsibilities of the Custodian to ensure that industry, both employers and unions, play a strong role in guiding the development and ongoing operation of the National Custodian and

that there are clear demarcations separating the role of the Custodian from other players in the system.

- We strongly oppose the establishment of a Taskforce that is heavily dominated by the representatives of the states and territories. It is our view that the Taskforce should be led by a majority of representatives of employers and unions with representation from the states. We are fearful that the model proposed would lead to 'more of the same'.

2. Enhance the quality and effectiveness of the Australian Apprenticeships system by clarifying the roles and consolidating the number of stakeholders in the system, ensuring that services are provided by the most appropriate provider, duplication of service delivery is reduced and administrative processes are streamlined.

The National Custodian would ultimately be tasked with this role and will require Australian and state and territory governments – in consultation with industry, unions and other key stakeholders – to work together.

In the interim the independent taskforce would progress this work.

AMWU Observations:

- There are too many intermediaries in the system. The relationship between an employer and an apprentice is often compromised by the commercial interests of intermediaries such as Job Services Australia providers, Registered Training Organisations, and Australian Apprenticeship Centres.
- The AMWU believes that there is significant scope for clarifying the roles and consolidating the number of intermediaries and brokers in the system. In addressing this issue though, the AMWU calls for clarity and certainty in terms of the responsibilities attached to these intermediaries and particularly in terms of their accountability to the system, which has been a significant weakness of the current system with oversight of the system split between state apprentice and training regulators and Commonwealth funding bodies.
- We support the proposal to have the National Custodian tasked with clarifying the roles and consolidating the number of intermediaries and brokers in the system, but we believe that role should extend to monitoring and holding accountable, those bodies charged with supporting the apprenticeship system.

3. Establish a formal accreditation process for the pre-qualification and training of all employers of apprentices and trainees to ensure a nationally consistent minimum standard of high quality employment and training is provided. In addition establish an Excellence in Employment Scheme to recognise and reward those employers who have consistently demonstrated their commitment to excellence in training apprentices and trainees.

AMWU Observations:

- The AMWU supports the imposition of minimum standards and a process of training and accreditation of employers who would engage apprentices. We believe that the standards that are set for such employers include industrial relations as well as training related criteria.
 - We believe there may be merit in assigning this establishing the criteria
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following the FWA Review that Panel has supported.

4. Establish structured support for employers to provide high quality employment and workforce development experiences for eligible apprentices and trainees. The focus of Australian Government support should be on assisting employers to provide high quality on-the-job and off-the-job training through support services such as mentoring and pastoral care.

AMWU Observations:

- High quality on and off job training on their own are often not enough to produce a high quality tradesperson. Mentoring and pastoral care are also a fundamental component of a successful apprenticeship system. As stated above, the apprenticeship system is not simply another form of education and training.
- The production of highly skilled, functioning and effective tradespersons is a complex process that relies on the successful integration of a range of components in a systematic way.
- We strongly support more emphasis and support for building the capability of employers to provide high quality employment and workforce development experiences and high quality mentoring. Surveys conducted by the AMWU clearly identify that apprentice's value mentoring highly.

5. Redirect current Australian Government employer incentives to provide structured support services to eligible apprentices and trainees and their employers in occupations that are priorities for the Australian economy. While a wide range of occupations should be trained through apprenticeship and traineeship pathways, Australian Government support should focus on occupations that have tangible and enduring value for the economy – both in the traditional trades and the newer forms of apprenticeships and traineeships, such as community services, health services and information technology.

AMWU Observations:

- The AMWU believes that the nature of the vocation and its value to the community should be the basis upon which decisions to offer funding support to particular apprenticeships.

6. Reinforce the need for a shared responsibility for the Australian Apprenticeships system by establishing an Employer Contribution Scheme in which employer contributions will be matched by the Australian Government. Employers who meet defined benchmarks for training and support of eligible apprentices and trainees would have their contribution rebated, either in part or in full.

AMWU Observations:

- The AMWU strongly supports the proposal to establish an Employer Contribution Scheme to ensure that the consumers of skills contribute to the costs of their development.

- We are reminded of the comments of then Commonwealth Minister, John Dawkins, which apply equally today, in launching the Report of the ACTU/TDC Mission known as 'Australia Reconstructed' in 1987:

" Industry has been allowed to slip into the bad habit of regarding a skilled workforce as a free good....

.....Skill shortages were something that could be made up for by importing or poaching"

7. Facilitate a cooperative and flexible approach by governments and industry bodies to allow for the continuation of both training and employment of apprentices and trainees during periods of economic downturn. Early intervention should be a key element of this approach. Support for a range of measures to be in place until economic recovery occurs could include:
 - reduction of work hours offset by additional training
 - increased off-the-job training
 - placement with other employers within the industry
 - increased mentoring and support.

AMWU Observations:

- The AMWU supports this recommendation but cautions against institutional delivery as the 'first choice' option rather than the hard work of maintaining employment.

8. Formally regulate the quality of VET in Schools within the VET system to enhance the consistency and quality of training across all jurisdictions and to recognise the potential of VET in Schools as a pathway into an apprenticeship or traineeship.

AMWU Observations:

- The AMWU is highly critical of so-called VET in Schools programs that are thinly disguised school retention schemes that treat vocational standards with contempt.
- There is growing concern in industry about the damage that low quality school based programs are doing to confidence in the outcomes of training.
- The key interest that industry has is that the industry standard as expressed in Competency Standards, is met. It is unacceptable to 'discount' the standard simply because a school may not have the equipment or the expertise to delivery it.

9. Increase national consistency in preparatory training by directing the National Quality Council to develop definitions for pre-apprenticeship and pre-vocational training.

AMWU Observations:

- The AMWU's support for this recommendation is predicated on Industry Skills

Council's being tasked with the role of developing pre-vocational and pre-apprenticeship programs that meet the needs of their particular industry within a common nationally consistent definition of what pre-vocational and pre-apprenticeship programs are intended to deliver.

10. Provide additional support for apprentices and trainees who face specific challenges, such as:

- Indigenous Australians
- disability
- located in regional or remote Australia
- having poor language, literacy and numeracy skills.

Australian Government support will be provided to these apprentices, trainees and their employers to assist in overcoming barriers to participation and completion of their apprenticeship or traineeship. Support will be through the provision of tailored structured support services and the continuation of some current Australian Government employer incentives.

AMWU Observations:

- The AMWU supports this recommendation but cautions that the support provided cannot be delivered as simplistic wage subsidies. Workforce participation targets will not, in our view, be met unless we succeed in attracting and sustaining the participation of a broader range of Australians regardless of the challenges they may have to confront in participating in the workforce.
- Case management and genuine respect are key factors that will determine whether this recommendation bears fruit.

11. Implement a strategy to raise the status of apprenticeships and traineeships including promotion as a valued career choice for both males and females. This should be led by the Australian Government, in consultation with state and territory governments, industry bodies and unions. The National Custodian, when established will lead the ongoing effort to raise the status of apprentices and trainees.

AMWU Observations:

- We support the submission of the ACTU to the Apprentice Taskforce:
"whatever the strategic response to the current issues confronting apprentices, the integrity of the apprenticeship and traineeship system must be maintained. Whilst the structure may change the overall balance of on and off the job training critical for vocational outcomes must be preserved. In addition the integrity of the national training framework cannot be put at risk."

12. Promote a culture of competency based progression in apprenticeships and traineeships, in partnership with industry bodies and employers. Additionally, a greater acceptance and achievement of competency - based wage and training progression should be supported by all stakeholders.

AMWU Observations:

- The AMWU supports this recommendation.

13. Improve the implementation of Recognition of Prior Learning and Recognition of Current Competence and support provisions for such recognition in modern awards to ensure that flexibility and mobility are supported.

AMWU Observations:

- Recognition of Prior Learning is a fundamental pillar upon which the reforms to Australia's training system was built and was intended to be one of the benefits that would accrue to workers without post school qualifications out of the restructuring of Australian industry in the late 80's and early 90's.
- The training sector has been spectacularly unsuccessful in meeting their obligation to offer RPL.
- We strongly support this recommendation and call for a strong role for employers in the considerations about how the implementation of RPL might be improved and what role workplace assessors may play in that process.

14. Support a review of apprenticeship and traineeship provisions, wages and conditions by Fair Work Australia, considering:

- the removal of barriers to competency based wage progression in modern awards
- apprentice and trainee award pay compared to going rates of pay
- age, diversity and circumstances of commencing apprentices and trainees
- allowances (travel, tools, clothing, course fees)
- cost to apprentices and trainees of participation in an Australian Apprenticeship
- part-time and school-based arrangements
- recognition of pre-apprenticeship and pre-vocational programs
- supervision ratios for apprentices and trainees.

AMWU Observations:

- The AMWU is on the record as strongly supporting a broad review of apprenticeship provisions, wages and conditions by Fair Work Australia.
 - We particularly believe that there needs to be absolute certainty about the industrial rights of apprentices. It is clear that compliance with the existing standards for the employment and training of apprentices is an issue that is damaging the apprenticeship brand.
 - If we are to encourage more commencements and completions, we must provide apprentices with decent terms and conditions of employment.
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ATTACHMENT "1"

The AMWU June 2009 submission in response to the Australian Apprenticeships Taskforce Discussion Paper included the following observations.

"The apprenticeship model is well supported by apprentices and the community in general as an effective learning model that works despite some of the barriers that ideologically driven reforms and 'marketisation' of the training market have erected over the last decade.

The effects of some of these so called reforms can be seen in growing non-completion statistics in apprenticeships and traineeships where the number of cancellations and withdrawals in the 12 months ending 31 December 2008 was 135 200, 2% higher than the 132 400 cancellations and withdrawals in the 12 months ending 31 December 2007.¹

A recent Survey² conducted in 2008 by Colmar Brunton Social Research on behalf of the Manufacturing Industry Skills Advisory Council of South Australia (MISAC) made a number of findings in relation to barriers to the commencement and completion of apprenticeships.

"Barriers

A lack of encouragement, communication and information at school level was identified as a key barrier to apprenticeship commencements, while the wage structure and costs associated with training were identified as obstacles to completions – along with a sense from apprentices that they were not able to transfer their course curricula to workplace experience as quickly or as broadly as they would like.

Incentives

Clear incentives for both commencements and completions were identified in the ability to earn an income while training – and that this training would lead to excellent career opportunities in trades which would always be in demand.

Key strengths of the apprenticeship program were found in the quality of training and training facilities; interesting work; and a general quality work experience as an apprentice.

Perceptions about training

'Quality of training' was considered by apprentices to be the most important element of the apprenticeship experience.

Potential Improvements

Apart from a consistent call for an increase in wages, recommendations for improvements to the apprenticeship program focused on continuous on-the-job learning, including a call for more opportunities for work-place practice and more opportunities to pair with a qualified tradesperson."

Other long term effects of the trend to jettison vocational training and apprenticeship during times of economic downturn include the consolidation of training effort into a boom bust cycle where the economy works feverishly to train in times of growth and then drastically reduces its efforts during the downturn which in effect means there are

¹ NCVER http://www.ncver.edu.au/statistics/aats/quarter/dec2008/atts_decqtr08.pdf page 4

² <http://www.misac.com.au/cgi-bin/page.cgi?id=444> page 1

never enough skills available in the good times when they are required to capitalise on the opportunities that can come from growth.

The establishment of the training sector as a competitive commercial space has, of course, resulted in capacity to train being 'tailored' to the opportunities to extract a commercial return, which in turn means that during the times when training is jettisoned, training capacity is degraded to the point that there is insufficient capacity come the good times which compounds the problem described above.

Whilst we note that some employers have worked hard to retain the investment that has been made in their apprentices, we are saddened at the speed with which other employers have vacated the vocational training and apprenticeships field.

The AMWU welcomes the efforts being made by the Federal Government to support the employment of apprentices at this time but believe that those efforts must be carefully targeted.

To that end we, like the ACTU, are concerned to ensure that there is consideration of key issues that go to:

- The integrity of the training contract;
- The effective targeting of subsidies and entitlements;
- The role of the training provider;
- Practical support for apprentices; and,
- Industry and employer support in maximising the retention of apprentices and completion of apprenticeships.

We submit that the last years of the Howard Government saw support measures introduced ostensibly to support increased opportunities to train and retain apprentices, although in our submission those measures were skewed heavily in the interests of employers and training providers often at the expense of apprentices.

Maximising commencements and increasing completions

The AMWU submits that if the goal is to maximise commencements and increase completions then the last thing that should be done is to leave it to the market.

The AMWU believes that public funding support for vocational training should be distributed in the public interest.

Not all apprenticeships or traineeships result in skilled workers whose qualifications have the same social, economic or strategic impact. There is merit in governments making strategic decisions about the nature and extent of funding support they choose to provide to particular apprenticeships/traineeships.

This may mean funding for some but not others or different levels of funding for different programs.

Greater levels of support for apprentices in strategic occupations would encourage higher levels of commencement.

No consideration of apprenticeship commencements and completions would be complete without consideration of the circumstances under which apprenticeships operate and under which apprentices are employed.

The Colmar Brunton research conducted for MISAC made a number of findings relating to what apprentices thought of their experience of the apprenticeship system:

"The Colmar Brunton report found that one of the key barriers to participation in apprenticeships is lack of information, communication and encouragement at a school level.

This is compounded by:

- A perceived 'pressure' for students to go on to university, with trades considered a 'lesser' career path (sometimes by family and friends as well as careers advisors),
- Limited understanding of what an apprenticeship entails, so that it only becomes an 'option of choice' for those who have a specific passion (such as an apprentice mechanic fulfilling a life-long goal to work with cars), and
- A perception of low wages (although the ability to 'earn-while-you-learn' is also an incentive).

In the focus groups, participants spoke about a perceived lack of:

- Promotion at school-leaving age,
- Mentors to demonstrate the value of a trade qualification, and
- Opportunities for hands-on experience,

coupled with what they now thought to be low wages during apprenticeship and a less than desired increase once qualified.”³

And

“While the focus groups discussed 'barriers' to people choosing an apprenticeship, the survey asked apprentices to nominate 'obstacles' they had encountered during the apprenticeship program.

Respondents were given a list of 15 potential obstacles and invited to circle any they had met – meaning they could choose more than one.

The 'top five' obstacles nominated were:

- a. Cost of tools, tuition and/or books,
- b. Inconsistent work / lack of work,
- c. Family or personal problems,
- d. Problems with co-workers, employers or sexual harassment and discrimination, and
- e. Limited ability to put the techniques learned at the RTO into practice at work.”⁴

The research supports the long held view of the AMWU that the more needs to be done to encourage take up and completion of apprenticeships by providing a more supportive environment in which genuine learning, in the context of employment, can take place.

The report paraphrases the views of the apprentices on what is required to strengthen and encourage apprenticeships as follows:

- Lift the profile in schools – a trade is a 'desirable option'
- More opportunity to turn 'learned techniques' into 'practiced skills' in the workplace
- 'Earn-while-you-learn' – with quality training and quality training facilities
- 'Skills in demand' – means long-term career opportunities

³ <http://www.misac.com.au/cgi-bin/page.cgi?id=444> page 6

⁴ *ibid* page 8

- Training is relevant and contemporary – let's get it into practice!
- A structured on-site training plan to plot the use of skills – so everyone knows what to expect
- More pairing with qualified tradespeople for continuous learning
- Expectations need to be met – or changed – both need improved communication

The survey also supports the view of the AMWU that there needs to be more involvement by industry in the quality of assessment area of the system to help to build confidence among employers and apprentices about the quality of the outcomes that come from training.

The AMWU supports the proper use of pre-apprenticeship programs designed to facilitate entry into relevant trade apprenticeships.

There is clear evidence that those who complete a proper pre-apprenticeship program are better informed about the choices and options they have and are much more capable of making a judgement about whether to pursue a trade. An NCVER report on pre apprenticeship programs found "Those who undertake pre-apprenticeships are more engaged with the occupation and are more likely to have plans for higher-level training after they complete their apprenticeships."⁵

In the same NCVER report "85% of apprentices said they intended to do further study related to their apprenticeship after finishing and those who had done a pre-apprenticeship were significantly more likely to be planning further study than those who had not, suggesting a stronger attachment to the occupation and greater prospects of retention."⁶

We do not support programs so generic in their nature that they do not contribute to the preparedness of an individual for a specific and relevant trade.

We are concerned that low level generic 'work preparation' and pre-vocational programs are becoming pre-requisites to entry into a trade apprenticeship and may be discouraging people from taking up a trade.

Where effective pre-apprenticeship programs are established, more needs to be done to identify the outcomes of training and learning that occurs in a pre-vocation or pre-apprenticeship program and relate that learning to credits against relevant components of the qualification the subject of the apprenticeship.

The AMWU is concerned that credit for competence already achieved is the exception rather than the rule and where it does exist it is commonly, and improperly, applied to the end of the nominal term rather than the beginning, where it would influence wage outcomes and provide a real incentive to the individual to continue into an apprenticeship.

We say that conditions should apply to the endorsement of a pre-apprenticeship program:

- It should clearly identify how successful completion will contribute to credit for both competency and 'time served' against the requirements of a Training Contract; and
- It should lead to, (but not necessarily result in) and be based on, a relevant Training Package Qualification.

⁵ NCVER "Pre-apprenticeships in Three Trades" <http://www.ncver.edu.au/research/proj/nr05010p.pdf> "Key Messages - page 7 NCVER October 2007

⁶ Ibid page 9

We say that any credits that result from the successful completion of such a program should be applied to the commencement of the nominal term of the apprenticeship.

We believe that measures to support commencement and completions of apprenticeships should be introduced that include the establishment of nationally agreed and legislated for standard minimum terms and conditions for the employment and training of apprentices that support structured and effective employment based learning environments that complement formal training undertaken as part of the Training Contract.

In our view minimum standards are required to provide comfort and support to people engaged in apprenticeships in order to overcome barriers to take up and obstacles to completion and should address such issues as:

- Improvements in the wages and conditions of apprentices;
- Mandatory provision of pre employment orientation on OHS, Contract of Training and employment rights, including rights to access legislative measures for dispute resolution;
- Specific measures that address issues such as suspensions in relation to apprentices employed by Group Training organisations;
- Measures to improve the health and safety of apprentices;
- Protections from harassment and abuse of apprentices;
- Measures that guarantee the right to effective recognition of prior learning (RPL);
- Effective implementation of competency based wage progression in parallel with competency based completion and the effective engagement of the apprentice in decisions relating to their competency or otherwise;
- Measures to improve access to quality training and support for both on and off the job training;
- Guaranteed access to work and learning experiences that are relevant and appropriate to the trade that is the subject of the apprenticeship;
- The right to information from unions and employer associations;
- The right to union membership and participation in the affairs of their union;
- Measures to boost the number of apprenticeships by removing barriers to the take up and completion of apprenticeships such as those barriers described in the aforementioned Colmar Brunton research;
- Measures to encourage the take-up of adult apprenticeships by existing workers;
- Measures to defend the trades from fragmentation and quick-fix training schemes including the use of intermediate or fragmented qualifications;
- Measures to defend against the inappropriate use of so called 'skill sets' that are intended to break down the comprehensive and generic skills base of the trades;
- Protection from abuse of competency based apprenticeship models;
- Defence against fully institutional delivery of trade qualifications in the absence of an apprenticeship;
- Defence against the use of 'accredited courses' that undermine national industry training package qualifications developed by the industry parties through national Industry Skills Councils;
- Improved protection of wages, employment and employment conditions for existing workers who become apprentices.

The AMWU believes that greater attention should be paid to the establishment of contracts of training to ensure that the arrangements are suitable and consistent with the desire to have them successfully complete.

The use of mandated intermediaries through the Australian Apprenticeships Centre's (AAC's) has failed to deliver the sort of supports that are required to facilitate sustainable apprenticeships.

There is a case to be made that the introduction of AAC's has interfered in the relationship that is required to be developed between an employer and an apprentice for the apprenticeship to be sustainable.

It is our view that AAC's must be much more effective in ensuring the person being signed to the Training Contract, the employer, the qualification and the vocation are coherently relevant to the circumstances.

Approval of Training Contracts should only be provided where there is acceptable confidence that the Training Contract arrangement is based on an appropriate relationship between the person, the qualification and the vocation, the employer and that the employer has undertaken to provide work experiences that are consistent with the learning required of the qualification and the obligations contained in the standard form of the contract.

The AMWU believes that the increasing number of cancellations of contracts of training represent wasted opportunities and wasted resources.

The AMWU submits that:

- it is far too easy to effect a cancellation of a contract;
- there are insufficient resources devoted to maintaining contracts of training to completion;
- greater consistency in relation to the criteria that must be met before a cancellation is approved and states, Territories and the Commonwealth should consult with industry peak bodies on the establishment of a binding code of practice to apply to apprenticeship cancellations which recognises cancellation of a Training Contract as a last resort.

The AMWU believes that Skills Australia should be required to report to the Ministerial Council on an annual basis on the effectiveness of the Contract of Training system, and in particular, the level of completions and non-completions and the reasons that can be established for non-completions.

The report should also include any advice Skills Australia may have to offer the Ministers on strategies to improve the effectiveness of the system."