

A Joint Submission between the
National Rural Women's Coalition and
the Isolated Children's Parents
Association of Australia | February 2024

National Skills Passport

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National Rural Women's Coalition (NRWC)

Preamble

The National Rural Women's Coalition (the NRWC) is a grass roots organisation, established in 2002, that works to support and grow vibrant rural, remote, and regional communities throughout Australia. We are a coalition of five rural alliances - the Australian Local Government Women's Association, Australian Women in Agriculture, National Rural Health Alliance, Women in Seafood Australasia and Transport Women Australia Limited.

For over twenty years, we have worked to ensure better social, economic, and environmental outcomes for women in rural townships, in rural communities and in primary production throughout Australia.

The NRWC provides a collaborative, powerful national voice for women living in Rural, remote, and regional Australia through:

- Representing the diverse views and voices of women in rural, remote, and regional Australia;
- Providing advice to the Australian Government on policy issues relevant to the views, circumstances and needs of rural women; and
- Contributing to building a positive profile of rural women, their achievements, and their issues.

We believe it is important that the unique views of rural women who reside in the numerous rural, remote, and regional communities throughout Australia as farmers,

businesswomen, community leaders and volunteers, have substantial input into consultations about their communities, industries, needs and issues, including any matters relating to women's rights, gender equality and discrimination.

Isolated Children's Parents' Association of Australia (ICPA Aust)

Preamble

The Isolated Children's Parents' Association (ICPA Aust) is a voluntary, apolitical, national parent organisation which advocates on behalf of its members for equity of access to an appropriate education for all geographically isolated children and students, from early childhood through to tertiary. The majority of the 2000 plus member families of the Association reside in geographically isolated areas of Australia, and all share a common goal of achieving equitable access to education for their children and the provision of services required to achieve this. Students whose family home is in rural and remote Australia, often live vast distances from services required to support the education of these students.

Background

In September 2023, alongside the release of the Employment White Paper, the Australian Government announced it would consult widely to develop a business case for a National Skills Passport. The National Skills Passport could help workers promote

their qualifications and help businesses find more skilled workers. The Employment White Paper expressed the Australian Government's vision for a dynamic and inclusive labour market, where everyone has the opportunity for secure, fairly paid work and people, businesses and communities can be beneficiaries of change and thrive. By better matching skilled workers with the businesses that need them, we can support better outcomes for individuals and employers.

A National Skills Passport has the potential to be a practical solution that helps individuals who choose to participate to take the next step in their education or career. They could view, share, and assess their skills and qualifications across Vocational Education and Training (VET) and higher education through a trusted and integrated digital system, validated from trusted sources. It will be critical to understand and define what are considered trusted sources.

A National Skills Passport could connect with other relevant services, make life easier for employers, employees, and jobseekers, and promote upskilling and reskilling behaviours to help build a culture of lifelong learning. A National Skills Passport could support personalised tailored career advice and guidance on education, training and career pathways including information on workforce demand. This supports the Employment White Paper finding that Australians will increasingly need to upskill and reskill throughout their lives to meet the needs of the labour market.¹

The Isolated Children's Parents Association (ICPA Aust) and the National Rural Women's Coalition (NRWC) thank the Australian Government for the opportunity to

¹ Australian Government. Department of Education & Department of Employment and Workplace Relations. (September 2023). *National Skills Passport Consultation Paper*.

provide feedback on the National Skills Passport, particularly for Australia's rural, remote, and regional women, parents, and communities.

Introduction

'Our Common Agenda' has twelve (12) commitments; the first commitment is that we 'leave no one behind.' 'Leave no one behind' urges member states to:

- Renew Social Contract (Strengthen Human Rights);
- Provide Universal Protection (Including Health Care and basic Security);
- ***Reinforce adequate housing, education and 'lifelong learning'***;
- World Summit 2025 (One (1) year away); and
- Identify complimentary measures to GDP. ²

In particular 'education and lifelong learning' ³ is relevant to the economic prosperity and productivity of rural, remote, and regional (RRR) Australia. The NRWC has previously delivered submissions on lifelong learning in RRR for VET pathways and strengthening RRR women's inclusion and participation in the workforce (Importantly including Aboriginal Torres Strait (ATSI) Islander women, Culturally and Linguistically Diverse (CALD) women and women who live with a disability). ⁴

² United Nations Secretary General. 'Our Common Agenda: Report of the Secretary General.' (2021) A/75/982 United Nations Economic Social and Cultural Organisation, International Commission on the Futures of Education by the UNESCO. A/75/982

³ Ibid 2.

⁴ National Rural Women's Coalition. Submission to the Department of Employment and Workplace Relations. (Supporting Women to achieve VET based careers) November 2023; Australian Government (2023). *Intergenerational Report 2023. Australia's future to 2063.* <https://treasury.gov.au/sites/default/files/2023-08/p2023-435150.pdf>; Department of the Prime minister and Cabinet. Women's Economic Equality Taskforce, (22 October 2023). *A 10-year plan to unleash the full capacity and contribution of women to the Australian Economy 23-33.* <https://www.pmc.gov.au/sites/default/files/resource/download/womens-economic-equality-taskforce-final-report.pdf>

Welcome Governments Commitment of equitable access to lifelong learning in

RRR Australia

NRWC and ICPA (Aust) have come together on this joint submission on a 'National Skills Passport.' (NSP) ***Whilst we strongly agree in solidarity with the commitment of this Government for equitable access to 'lifelong learning' in Rural, Remote and Regional (RRR) Australia, NRWC and ICPA (Aust) hold some concerns. Concerns are the unintended consequences of the new 'National Skills Passport' (NSP) for women and young women, parents', and families in RRR Australia who are living remotely and do not have access to:***

- Training services to obtain qualifications;⁵
- Secure and stable telecommunications and internet;⁶
- Safe and affordable housing;⁷
- Interpreters (ATSI and CALD);⁸ and

⁵ Ibid 4.

⁶ Dykgraaf SH, Desborough J, de Toca L et al. "A decade's worth of work in a matter of days": The journey to telehealth for the whole population in Australia. *Int J Med Inform.* 2021; 151:104483. <https://doi.org/10.1016/j.ijmedinf.2021.104483> & Infrastructure Australia. *Mobile telecommunications coverage in regional and remote areas.* Commonwealth of Australia. 2020. www.infrastructureaustralia.gov.au/map/mobile-telecommunications-coverage-regional-and-remote-areas

⁷ Australian Government. The Treasury. (25 September 2023) Working Futures: The Australian Government's White Paper on Jobs and Opportunities Ch 3, p 58. <https://treasury.gov.au/employment-whitepaper/final-report>

⁸ Kukolja, K., Australian Broadcasting Corporation (ABC). (11 August 2023) Chronic shortage of Indigenous interpreters in Australia's legal system risks violating human rights. <https://www.abc.net.au/news/2023-08-11/law-report-investigates-indigenous-court-interpreter-shortages/102696730> ; Armstrong, K. Special Broadcasting Service. (SBS) (2 August 2016) 'Significant Problem' : why a lack of interpreters is putting health of migrants at risk. <https://www.sbs.com.au/news/article/significant-problem-why-a-lack-of-interpreters-is-putting-health-of-migrants-at-risk/0ut9qnz57>

- Support to complete their 'NSP' (including ECEC services to care for children if they return to work or upskill their current vocations).⁹

'I grew up doing my homework by candlelight, we did not have electricity, it was a struggle. Year twelve (12) was the hardest, I dropped out. Not only that, but it's also everything else. Living in the bush, people forget that electricity, water, transport to school if there is one and stable internet is not like it is in the big cities.'

Further NRWC and ICPA (Aust) are concerned about the unintended consequences of exacerbating the education divide. The Employment White Paper released September 2023 states¹⁰:

'People from major cities are more than twice as likely to attend university as those in regional and remote areas.¹¹ The proportion of people with disability aged 20 or over with a bachelor's degree is only 17 per cent despite 34 per cent having completed Year 12 or equivalent.¹² Among all Australians aged 15 and over, only 7.4 per cent of First Nations Australians, 15.2 per cent of regional

⁹ Australian Government. The Treasury. (25 September 2023) Working Futures: The Australian Government's White Paper on Jobs and Opportunities. Ch 3, p 58. <https://treasury.gov.au/employment-whitepaper/final-report>; and Australian Government (2023). *Intergenerational Report 2023. Australia's future to 2063.*

¹⁰ Australian Government. The Treasury. (25 September 2023) *Working Futures: The Australian Government's White Paper on Jobs and Opportunities*. 7.5.3.2 (p 119)

¹¹ Universities Australia, *Data Snapshot*, (July 2022), https://www.universitiesaustralia.edu.au/wp-content/uploads/2022/08/220523-Data-snapshot-2022_web.pdf.

¹² Australian Institute of Health and Welfare (Commonwealth of Australia), *People with disability in Australia: Educational attainment*, (2022), <https://www.aihw.gov.au/reports/disability/people-with-disability-in-australia/contents/education-and-skills/educational-attainment>.

and remote Australians and 17.3 per cent of Australians in low socioeconomic areas (SES) have a bachelor's degree or above. ¹³

These statistics demonstrate the current disparity for RRR education, RRR education outcomes are lower compared to urban Australia. ¹⁴ RRR young people, women and women who experience intersectionality are vulnerable to further inequalities.¹⁵ If the underlying significant contributing issues that impact participation in the workforce and or education such as housing, are not substantially addressed, the NSP will not achieve the purpose of increasing job learning, career development and filling critical skills shortages in RRR Australia.

It is imperative that if the NSP goes ahead, that considerations are incorporated into the online platform to allow for RRR women, parents, and families to demonstrate their highly sort after transferable skills and attributes. Further, considerations in the NSP review, should be made to mitigate the impact of limited access to education across the lifespan of RRR women, parents, and families. Simply put the NSP should not highlight any disparities further and instead highlight the highly sort after resilience, unique transferable skills, and attributes of RRR women, parents, and families.

¹³ Australian Bureau of Statistics (Commonwealth of Australia), *Census of Population and Housing*, (2021), accessed 14 August 2023.

¹⁴ Ibid 12.

¹⁵ First Nations National Action Plan – Intersectionality

Health Care challenges in RRR Australia

There are challenges to attract and retain health care workers in rural communities. It is important that healthcare workers can work within their full scope of practice and easily transition across different health care organisations – and this includes disability and aged care settings. This could be transferable to education and early childhood education and care. If a NSP is implemented it should be used to support health, disability, and aged care workers in rural settings to work across these settings. The NSP should be used in education and early education and care in rural settings to work across these settings

It is important for governments to invest in more physically accessible training locations (Vocational Education Training and University) in rural and regional areas as an important part of developing skills and stimulating local rural/regional economies. It is part of growing our own health workforce and building on the evidence that people from rural backgrounds who become health professionals are more likely to practice rurally once they have trained. Rural people need to be able to access these training and work experience opportunities on a more equal footing with people in metropolitan settings, otherwise a NSP will lead to further inequity.

Unique to ATSI peoples and Australia - A Cultural Passport – Australia's Song

lines ¹⁶

As quoted by Deadly Story....

'One example of a Song line is the 3,500km travel route that connected the central desert region with the eastern coast of the country (modern day Byron Bay). This travel route allowed the desert communities to visit the ocean where they could witness how dolphins were used by the people to herd fish. Similarly, people from the coastal communities were able to travel and visit the culturally important sites of Uluru and Kata Tjuta.'

'Song lines also act as a 'Cultural Passport' when travelling through the country of another Mob. The verses that relate to a particular region, can be sung in the local language so that the people living there know that travellers are passing through in a respectful manner.'

*'Song lines are the singing celebration of Country, a cultural passport when walking on the lands of neighbouring Nations and a way to acknowledge the great Creator Spirits and their footprints in the land.'*¹⁷

The question remains, how would a NSP recognise 'a cultural passport' the importance of time immemorial Song lines and Stories that sit outside the dominant discourse of mainstream education, yet are vitally important to preserve? Can a NSP acknowledge,

¹⁶ Deadly Story. Songlines. https://deadlystory.com/page/culture/Life_Lore/Songlines

¹⁷ Deadly Story. Songlines. https://deadlystory.com/page/culture/Life_Lore/Songlines

incorporate, value and respect 'a cultural passport'?¹⁸ **Could Australia set International Standards, by embedding cultural practice, knowledge, and connection into a NSP ?**

If not, the unintended consequences and risk is that ATSI peoples (and CALD people) are again being left behind. ¹⁹They will not actually be able to access lifelong learning²⁰ and prosperity that is inherently connected to culture, continuing to strengthen culture and preserve culture. ATSI communities' sense of inclusion, value, and acknowledgement that incorporates two-way learning, is depreciated in a mainstream discourse of education, skills, and licences. The NRWC would advocate and encourage the Australian Government to further elevate ATSI peoples, their skills and knowledge, (basket weaving, jewellery, art, music, bushfoods, medicine, healing, dance, storytelling, bi linguists, doctors, lawyers, academics, kinship care, looking after the land traditionally (ranger programs)) and that this would be one of the first parts of an Australian NSP, not left behind and sat on the shelf as a later add on to the NSP. ²¹

NRWC are urging the Australian Government to set International Standards and incorporate a 'cultural passport' ²²into the NSP, if the NSP goes ahead. NRWC advocate as per 'Our Common Agenda' ²³ that we do not leave ATSI women and

¹⁸ Ibid 14.

¹⁹ Australian National Indigenous Agency. (13 February 2024) *Commonwealth Closing the Gap 2023 and Annual Report and 2024 Implementation Plan*.

²⁰ United Nations Secretary General. 'Our Common Agenda: Report of the Secretary General.' (2021) A/75/982 United Nations Economic Social and Cultural Organisation, International Commission on the Futures of Education by the UNESCO. A/75/982

²¹ Australian Government. National Indigenous Australian Agency. *Commonwealth Closing the Gap 2023. Annual Report and 2024 implementation Plan*. (13 February 2024).

²² Deadly Story. Songlines. https://deadlystory.com/page/culture/Life_Lore/Songlines

²³ United Nations Secretary General. 'Our Common Agenda: Report of the Secretary General.' (2021) A/75/982 United Nations Economic Social and Cultural Organisation, International Commission on the Futures of Education by the UNESCO. A/75/982

children in RRR Australia behind. ²⁴ This is transferable to CALD women and children and other groups who experience intersectionality.

User Platforms

Further NRWC and ICPA (Aust) are concerned that there appears to be many different platforms. The platforms that are currently in use for qualifications, skills, licences, up skilling, and career advice that NRWC and ICPA (Aust) are aware of are:

- Unique Student Identifier (USI); ²⁵
- My e equals (Higher Education Institutions); ²⁶
- National Microcredentials Platform (Microcredentials Marketplace);²⁷
- Microcred seeker; ²⁸
- Employment Hero (private human resources) platform; ²⁹
- University and VET ‘career hubs’ and ‘career advice’;³⁰
- ‘Be That Teacher’; ³¹
- Private colleges, for example, College of Law; ³²
- Your Career ;³³
- LinkedIn; ³⁴ and

²⁴ Australian Government. National Indigenous Australian Agency. *Commonwealth Closing the Gap 2023. Annual Report and 2024 implementation Plan.* (13 February 2024).

²⁵ Australian Government. Unique Student Identifier. (2024) <https://www.usi.gov.au>

²⁶ My eEquals. The official tertiary credentials platform. (2023) <https://www.myequals.edu.au/>

²⁷ Australian Government. Department of education. (19 December 2023) Micro credentials Pilot in Higher Education. <https://www.education.gov.au/microcredentials-pilot-higher-education>

²⁸ Australian Government. Mircocred seeker. (2023) <https://www.microcredseeker.edu.au/>

²⁹ Employment Hero. Employment solved. <https://employmenthero.com/>

³⁰ Careerhub Central. List of Institutions. (2024) <https://careerhub.com.au/institutions>

³¹ Australian Government. Be that teacher. Who will inspire you. <https://www.bethatteacher.gov.au/>

³² College of Law. (2024) <https://www.collaw.edu.au/>

³³ Australian Government. Department of Employment and Workplace relations. Your Career. Explore your Career. (2023) <https://www.yourcareer.gov.au/>

³⁴ LinkedIn. Welcome to your professional community. <https://au.linkedin.com/>

➤ Jugglr.³⁵

NRWC and ICPA (Aust) are concerned it appears that a proper audit of the current platforms and use of these platforms has not occurred. ***NRWC and ICPA (Aust) would advocate for an audit of the current platforms and their current user engagement, including initial and ongoing use and outcomes for people using the platforms before spending \$9.1³⁶ million on a new platform.***

NRWC and ICPA (Aust) advocate that one of the unintended consequences of the NSP is that sitting alongside the above current platforms busy RRR women, young women, parents, and families will find this cumbersome to navigate, defeating the purpose. Would the NSP replace some or all the above to be a central point?

NRWC and ICPA (Aust) advocate that many RRR women, young women, parents, and families, will simply fall through the gaps of the education and workforce participation inclusion without serious awareness of what already exists and support to engage with any future initiatives. Many RRR women, young women, parents, and families are not aware of the above platforms, without a new 'NSP' being introduced. The purpose of the National Skills Platform may be defeated if it is confusing with too many platforms.

³⁵ An app designed to link mothers in with other mothers in their community.
<https://www.openxcell.com/work/jugglr>

³⁶ The Conversation. (26 September 2023) Is it time for Australia to Introduce a National Skills Passport?
<https://theconversation.com/is-it-time-for-australia-to-introduce-a-national-skills-passport-214267>

Support for National Skills Passport (NSP)

Regional teachers and staff have commented that the NSP could be particularly supportive to school leavers, who for whatever reason misplace their qualifications, and require urgent copies of the same for future employment. This includes for RRR ATSI women and young women who travel between remote Torres Strait islands, communities and / or Papua New Guinea and Australian regional centres to complete their education. This also relates to many rural and remote students who must also move away from home to access education. This also relates to people from rural, remote, and regional areas in Australia who may have limited communications (stable access to internet) or services to obtain copies of their qualifications, certificates of attainment, school achievement and or other qualifications.

Support of the NSP, include adding National Accreditation relevant to cross jurisdictional checks and verifications. Effectively ending the current decentralisation.

The development of a NSP would create an opportunity to develop a Standardised National System to provide consistency across all State and Territories of current systems utilised by employers and employees such as:

- Construction Safety requirements – NSW White Cards (State and Territory equivalent);
- Health Care (Nurses, Disability and Aged Care) ;
- Education;
- Early Childhood and Care Services (Including Early Childhood Teachers);
- Working With Children Checks (WWCC);
- Responsible Service of Alcohol (RSA);

- Responsible conduct of Gaming (RCG);

Voluntary use of National Skills Passport NSP)

NRWC and ICPA (Aust) further advocate that if the NSP is introduced that this is voluntary without any financial penalties for not using the platform. Further the NRWC and ICPA (Aust) would advocate that 'lived experience' is informing policy and preferred by employers in particular settings, however the NSP for qualifications, skills and licences is least likely to place importance or even include lived experience, as this is not quantified, and measured qualitatively.

This automatically excludes sought after knowledge and RRR women, young women, parents, and families who have specific lived experience such as mental health, DFSV, overcoming adversity in agriculture and resilience on the land. Will a NSP, have the unintended consequence of excluding RRR women, young women parents', and families with lived experience?

There are further concerns held by the NRWC and ICPA (Aust) that the NSP, will not be strength based and allow for creativity. For example, the UK 'Euro pass' ³⁷and Singapore 'MySkillsFuture' ³⁸equivalents have resume 'templates' that cannot be altered or express the personality and creative talent of employees. ³⁹ If Information

³⁷ European Union. (1 July 2022). '45 Million visits to site, 4 million users. Celebrating two years since launch of new Euro pass.' <https://europa.eu/europass/en/news/celebrating-two-years-launch-new-europass>

³⁸ Singapore Government Agency Website. (2024) My Skills Future. <https://europa.eu/europass/en/news/celebrating-two-years-launch-new-europass>

³⁹ Novoresume. (27 December 2023) 4 reasons why a Euro pass CV is not ideal in 2024. <https://novoresume.com/career-blog/europass-cv>

Technology is one of the next biggest economies, ⁴⁰ then how will creativity be expressed in a document that is a template where every template looks the same?

Further, How is the site going to encourage or promote further attainment of qualifications – is it through algorithms in the site on a candidate’s data?; is it through the use of AI based on initial training added that will direct the pathway suggested for students?; or is it going to be built on careers discussions and interview with trained staff; if so how are such services provided and accessed equitably by those in frequently isolated RRR locations ?

Capitalising on the Current Opportunities

The lost capital of women’s nonparticipation in the workforce, is estimated to be 335 billion in 2025. ⁴¹ The rise of the ‘Technological and New Green Economies’⁴² allows for much opportunity, including entrepreneurship, independent contract, self-employment, and flexible work.⁴³ One study by Seet, Cripps and Nejati (2023) ; ‘*Transforming self-perceived self-employability and entrepreneurship among mothers through mobile digital sharing economy platforms: an exploratory case study*’⁴⁴ found that job security, although an individuals responsibility, was also based on an ‘*individuals perception of their own employability.*’ ⁴⁵

⁴⁰ Australian Government, Australia Trade and Investment Commission. (2023) Why Australia? Digital Technology. *Australia’s A\$167 billion tech sector creates amazing opportunities.*
<https://reneweconomy.com.au/regions-lead-plan-for-huge-new-transmission-link-and-4-2-gw-of-solar-and-storage/>

⁴¹ Fitzsimmons, T. W. and Callan, V. J. (2015), "Filling the Pool", Perth.

⁴² United Nations Secretary General. ‘*Our Common Agenda: Report of the Secretary General.*’ (2021) A/75/982 United Nations Economic Social and Cultural Organisation, International Commission on the Futures of Education by the UNESCO. A/75/982.

⁴³ Ibid 36, 40 and Seet, P-S, Jogulu, U., Cripps, H., Nejati, M., 2023. Transforming self-perceived self-employability and entrepreneurship among mothers through mobile digital sharing economy platforms: an exploratory case study. *Personnel Review*, 52(3): 492-520

⁴⁴ Ibid 41, Seet et al. (2023)

⁴⁵ Fitzsimmons, T. W. and Callan, V. J. (2015), "Filling the Pool", Perth.

This study demonstrated that human capital is naturally displaced when the employee has had a career break, for example to have a family. Further, women who hold the bulk of caring roles and duties, are seen as reduced human capital, especially in the form of a resume as this is a work history, which diminishes the unpaid work and caring economy. ⁴⁶

In this study by Seet, Cripps and Nejati (2023) 201 mothers downloaded an app for one (1) month, the criteria for participants, was mothers had to have a work history and be familiar with Facebook or use of mobile Apps. Of the 201, only 150 completed the study, as 35.8% had not downloaded the app due to time constraints and other personal circumstances. Of the 150, the two main reasons that mothers used the app was to :

1. Connect with other mothers; and
2. Explore using sharing and offering services. (the App Jugglr was predominantly advertised for this use). ⁴⁷

Further the 150 mothers, stated that the most useful parts of the app were:

- Health and Wellbeing;
- Personal Development;
- Help around the home; and
- Help with children. ⁴⁸

⁴⁶ Seet, P-S, Jogulu, U., Cripps, H., Nejati, M., 2023. Transforming self-perceived self-employability and entrepreneurship among mothers through mobile digital sharing economy platforms: an exploratory case study. *Personnel Review*, 52(3): 492-520.

⁴⁷ Ibid 44.

⁴⁸ Seet, P-S, Jogulu, U., Cripps, H., Nejati, M., 2023. Transforming self-perceived self-employability and entrepreneurship among mothers through mobile digital sharing economy platforms: an exploratory case study. *Personnel Review*, 52(3): 492-520.

Home office and small business marketing was found to be ‘the lease useful services.’ 26 % browsed the app to see what was on offer, and 14.7% found the app to be of no use at all. Overall :

‘There was a low intention to keep using the app in the future.’⁴⁹

The most important issues identified in the Seet, Cripps and Nejati (2023) study were trust and security and mismatch in service expectations and product market fit.⁵⁰ These are expanded below.

Trust and Security

Trust and security are crucial in sharing platforms of professional and personal information. The NSP is a sharing platform of personal and professional information, skills, licences and is all linked to the *‘Individuals perception of their own employability.’*

⁵¹ For example, if health and wellbeing are a precursor to employment participation and priority for busy RRR women, parents, and families, would the NSP address the individual’s personal development to workforce participation? The NSP user would need to have trust and security to enable this to result in an increase in the perception of their employability. Without trust and security, as per the Seet, Cripps and Nejati (2023) study, there may not be the uptake or widespread use of the NSP.⁵²

⁴⁹ Ibid 46.

⁵⁰ Ibid 46.

⁵¹ Ibid 46.

⁵² Ibid 46.

Further, NRWC and ICPA (Aust) position is that at the minimum-security protocols such as are currently used by agencies such as MyGov, Medicare etc should be implemented for data security. Regarding third parties accessing NSP, as this is a digital platform, security needs consideration as does the access for those who are adding data credentials to the NSP. NRWC and ICPA (Aust) advocate for a centralisation with a federal body who had the authority to enter data on behalf of the Registered Training Organisation (RTO), University, College, or Training Provider. This should occur while RRR participants are 16 years of age, the NSP needs to be established as soon as students begin to obtain credentials, i.e., white card can be obtained from the age of 16. Additionally, qualifications obtained whilst engaged in secondary education include Cert II and III levels and these need to be included in the NSP.

Mismatch

In the same study by Seet, Cripps and Nejati (2023),⁵³ service users' requirements were not met by the app's services. A NSP may produce similar outcomes and not be fit for purpose. NRWC and ICPA (Aust) advocate that if 9.1 million⁵⁴ is to be spent on the NSP, that this be co-designed, with small NSP pilots, to measure NSP engagement and provide further research, quantitative and qualitative studies on:

⁵³ Seet, P-S, Jogulu, U., Cripps, H., Nejati, M., 2023. Transforming self-perceived self-employability and entrepreneurship among mothers through mobile digital sharing economy platforms: an exploratory case study. *Personnel Review*, 52(3): 492-520.

⁵⁴ The Conversation. (26 September 2023) Is it time for Australia to Introduce a National Skills Passport? <https://theconversation.com/is-it-time-for-australia-to-introduce-a-national-skills-passport-214267>.

1. Trust and Security;
2. Fit for Purpose;
3. Health and Wellbeing; and
4. Personal Development.⁵⁵

It could be that the NSP provides the missing link in the 'Technology and New Green Economy'⁵⁶ for RRR women, parents and families to strengthen, share and empower each other such as Jugglr,⁵⁷ (remembering 35.8% did not engage with the app in the Seet, Cripps and Nejati (2023) study)⁵⁸ or it could be the NSP unintentionally entrenches the under acknowledged capital of women, parents and families in RRR.

For example, RRR women, parents and families are:

- Farm Managers, Agriculturalists, Farmers;
- Agribusiness and associated business owners;
- Employers;
- Budget, book keepers;
- Primary Producers;
- Climate Change adapters and understand the impacts and how to mitigate the impacts on the land and primary production, including sustainable practices and adapting to low rain falls or floods that wipe out crops;
- Able to live on the land in rural, remote, and regional areas of Australia;

⁵⁵ Seet, P-S, Jogulu, U., Cripps, H., Nejati, M., 2023. Transforming self-perceived self-employability and entrepreneurship among mothers through mobile digital sharing economy platforms: an exploratory case study. *Personnel Review*, 52(3): 492-520.

⁵⁶ United Nations Secretary General. 'Our Common Agenda: Report of the Secretary General.' (2021) A/75/982 United Nations Economic Social and Cultural Organisation, International Commission on the Futures of Education by the UNESCO. A/75/982.

⁵⁷ Ibid 51.

⁵⁸ Ibid 53.

- Import and Export intrastate, interstate and internationally high-quality sought-after meat, meat products (including animal hide etc) dairy, grain, fruit, vegetables, bushfoods, medicinal plants and associated by products, nuts, legumes, and other crops, essential to Australia's productivity, nutrition and food security;
- Have conflict resolution skills;
- Home tutors; educators for children;
- Carers for family, farm members, neighbours and community;
- Volunteers in community;
- Excellent at time management;
- Able to research and advocate;
- And so much more.

NRWC advocate that if the NSP is implemented for \$9.1 million,⁵⁹ that the NSP must have the ability to recognise the human capital of women, parents, and families in RRR Australia. NRWC advocate that the NSP has the potential to fill the critical skills shortage in rural Australia. For RRR Australia employers to employee rural staff, how would the NSP attune to the requirements of RRR? How would this work, given that some of the skills learnt in farming, are taught on the land and not necessarily a qualification, or licence?

If the NSP is not designed appropriately, the mis match could potentially not engage the service users and not be fit for purpose for both RRR employers and employees.

⁵⁹ The Conversation. (26 September 2023) Is it time for Australia to Introduce a National Skills Passport? <https://theconversation.com/is-it-time-for-australia-to-introduce-a-national-skills-passport-214267>

The NRWC and ICPA (Aust) advocate that this is further evidence of the need for:

- 1. NSP pilots;**
- 2. Continued NSP research; and**
- 3. Confirmation from the NSP pilots and evidenced based research that the NSP is fit for purpose.**

NRWC and ICPA (Aust) would advocate at least one pilot should be in RRR Australia.

NRWC and ICPA (Aust) advocate the Government continue consultation around the development of a NSP, with all stakeholders, giving carefully considering to the following issues:

- What is the NSP achieving for future employees without incurring for them a social, personal, or financial cost? Be it a breach of privacy, discrimination, in compliance of Equal Employment Opportunity laws or account keeping fees;
- Who has control and ownership of the NSP and its data?;
- How does the passport itself assist the employers to increase their access to further skilled workers? ;
- Is the NSP going to have a database filtering options? ;
- Are potential employers going to access it or just those who's data is held in the NSP?; and
- Is a NSP going to benefit all users of the platform or will it enable some groups to gain an advantage over others.

Validation

Validations needs to be done at a minimum of two (2) levels, the RTO or training provider and again at the authorised data entry point. Validation points should be done by third parties. These validations need to be by Registered Training Organisation (RTO), University, College, or Training Provider, including accreditation with external bodies, such as Legal Practitioners Boards of each State and Territory⁶⁰ and AHPRA⁶¹ with confirmation requested at the time the data is uploaded to the NSP.

As discussed in this submission, lived experience and non-accredited skills should be added to the NSP. They should still be verified and validated skills and training as they are valuable in an NSP. Skill attainment such as work experience and industry training can be both verified and validated. Further, non-accredited but verified and validated skills and training are valuable in an NSP. Skill attainment such as work experience and industry training can be both verified and validated.

The NRWC and ICPA (Aust) maintain that the Australian Federal Government needs to maintain ownership of the process of the development and implementation of the NSP to ensure the integrity of a NSP, if the NSP Is to be implemented. Additionally, the credentialling platforms such as the USI, Vet transcript and Your Career are currently underutilised, and these platforms are already operated by Government bodies. As suggested an audit of current platforms, cost and user engagement should

⁶⁰ Queensland Law Society. Legal Practitioners Admission Board. (QLD) <https://www.qls.com.au/Legal-Practitioners-Admissions-Board>

⁶¹ Australian Health Practitioners Regulation Agency. (2024) <https://www.ahpra.gov.au/>

be done prior to the \$9.1-million-dollar NSP.⁶² There may be an overlap and the audit may expose the decentralisation of the current platforms and allow the NSP to be more focused and centralised.

Maintaining Employee's Rights Under Australia's current Employment Privacy

Law's and Equal Employment Opportunity Law's

The dichotomy between providing employers access to employee's qualifications, skills, licences, and work history to fill areas experiencing high vacancy and skilled shortages must delicately protect the principles of employee's Privacy⁶³ and Equal Employment Opportunity.⁶⁴

These protections have been fought for since the International Labour Organisation banned slavery.⁶⁵ Allowing employers to have access to employee's and perspective employee's qualifications, licences, skills, and work history may have the unintended consequence of watering down these protections. An employee can negotiate with an

⁶² The Conversation. (26 September 2023) Is it time for Australia to Introduce a National Skills Passport? <https://theconversation.com/is-it-time-for-australia-to-introduce-a-national-skills-passport-214267>

⁶³ Australian Government. Fair Work Ombudsman. (2024) Workplace Privacy. <https://www.fairwork.gov.au/tools-and-resources/best-practice-guides/workplace-privacy#privacy-and-personal-information> ; *Fair Work Act 2009 (Cth)*.

⁶⁴ *Equal Employment Opportunity (Commonwealth Authorities) Act 1987 (Cth)* ; *Discrimination Act 1991 (ACT)*; *Anti-Discrimination Act 1996 (NT)*; *Equal Opportunity Act 1984 (SA)*; *Anti-Discrimination Act 1998 (TAS)*; *Equal Opportunity Act 1984 (WA)*; *Anti-Discrimination Act 1971 (NSW)*; *Anti-Discrimination Act 1971 (QLD)*; *Equal Employment Act 2010 (VIC)*; *Discrimination Act 1991 (ACT)*.

⁶⁵ International Labour Organisation (ILO) (2016) The ILO lay in the foundations of social justice. <https://www.ilo.org/infostories/en-GB/Stories/The-ILO/Laying-the-Foundations-of-Social-Justice#laying-the-foundations-fo-socia-justice>

employer or perspective employer; however, employee protections cannot be compromised if the NSP is implemented.⁶⁶

The NSP must not come at the expense of watering down employee's EEO and legal protections.⁶⁷

Women's and Children's Safety

A NSP has the potential to be accessed by people who choose to use violence against women and children. For example, they could pose as an employer and access details, work history and or current work history or locality of a victim survivor. They could then continue to perpetrate violence against the women and children. Another example is a person who perpetrates child harm, uses the NSP to access information to locate vulnerable women, young women, and children, perhaps an email address or a phone number they can use on a social media platform and then go on to groom or target their intended victims.

Women and Children's Safety must be implemented into any 'NSP.' Suggestions are to consult with:

- National DFSV Commissioner Micaela Cronin;
- National Children's Commissioner Anne Hollands;
- National Women's Safety Alliance CEO Katherine Berney;

⁶⁶ Australian Government. Fair Work Ombudsman. (2024) Workplace Privacy. <https://www.fairwork.gov.au/tools-and-resources/best-practice-guides/workplace-privacy#privacy-and-personal-information> ; *Fair Work Act 2009 (Cth). Equal Employment Opportunity (Commonwealth Authorities*

⁶⁷ Ibid 39, 40, and 41.

- National Voice for ATSI children and families (Catherine Liddle); and
- First Nations National Plan Steering Committee.

To ensure protections for women and children are in any NSP reforms. NRWC can provide specific consultation and comment on interventions and preventions to uphold RRR Women’s and Children’s Safety in any NSP proposals. The NRWC also note that the National Plan to End DFSV includes prevention and early intervention.⁶⁸ The NRWC also note that the stand alone First Nations Action Plan also provides guidance on DFSV prevention.⁶⁹

Conclusion

The NRWC and ICPA (Aust) have clearly outlined the unintended consequences of a NSP for rural, remote, and regional (RRR) women, parents, and families (communities) in Australia. The NRWC and ICPA (Aust) would highlight that RRR Australia has highly sought after resilience and unique transferable skills that should be highlighted in any NSP.

The success of the NSP for RRR Australia would be reliant on the ability for the NSP to work two ways, firstly in assisting upskilling and work force participation in RRR and secondly to fill the RRR critical skills shortage, which is entirely different to the needs of urban Australia. The NSP would have to be able to be able to attune to ‘the needs

⁶⁸ Australian Government. Department of Social Services. (17 October 2022) *National Plan to End Violence Against Women and Children 2022- 2032*.

⁶⁹ Australian Government. Department of Social Services. (2023) Aboriginal Torres Strait Islander Action Plan 2023 – 2025. https://www.dss.gov.au/sites/default/files/documents/10_2023/dedicated-action-plan.pdf

of the bush' and address the structural limitations that need addressing to be of great benefit to RRR women, parents, families, and communities' prosperity and lifelong access to learning.⁷⁰

The NRWC and ICPA (Aust) has raised the many platforms already in use and cited one study on how the engagement with apps over time was low and initially over 35 % did not even download the app due to time constraints.⁷¹ The NRWC and ICPA (Aust) have recommended that a pilot be established to make sure that the NSP is fit for purpose and that at least one pilot site be in RRR Australia before the commitment of \$9.1 million⁷² is made, as it appears there are many platforms, but not enough awareness of what already exists.

Education and lifelong learning are essential to the prosperity and productivity, sustainability and survival of rural, remote, and regional Australia and must be considered in any national qualifications, skills, and licences platforms such as the NSP. The question remains if the NSP went ahead, will the NSP meet the needs of women, parents, and families in RRR Australia?

⁷⁰ Australian Government. The Treasury. (25 September 2023) Working Futures: The Australian Government's White Paper on Jobs and Opportunities Ch 3, p 58. <https://treasury.gov.au/employment-whitepaper/final-report>

⁷¹ Seet, P-S, Jogulu, U., Cripps, H., Nejati, M., 2023. Transforming self-perceived self-employability and entrepreneurship among mothers through mobile digital sharing economy platforms: an exploratory case study. *Personnel Review*, 52(3): 492-520.

⁷² The Conversation. (26 September 2023) Is it time for Australia to Introduce a National Skills Passport? <https://theconversation.com/is-it-time-for-australia-to-introduce-a-national-skills-passport-214267>

Recommendations

- 1. The NRWC and ICPA (Aust) welcome the strengthening of lifelong access to learning and secure work, however if the underlying issues specific to RRR Australia are not substantially addressed with the NSP such as:**
 - Training services to obtain qualifications (including physical training centres and face to face support) ;⁷³**
 - Secure and stable telecommunications and internet; ⁷⁴**
 - Safe and affordable housing; ⁷⁵**
 - Interpreters (ATSI and CALD);⁷⁶ and**
 - Support to complete their ‘NSP’ (including ECEC services to care for children if they return to work or upskill their current vocations).**

The NSP may have unintended consequences of exacerbating the education divide between RRR and urban Australia.

- 2. The NSP should not highlight any disparities (education, access to education) further and instead highlight the highly sought after resilience,**

⁷³ Ibid 4.

⁷⁴ Dykgraaf SH, Desborough J, de Toca L et al. "A decade's worth of work in a matter of days": The journey to telehealth for the whole population in Australia. *Int J Med Inform.* 2021; 151:104483. <https://doi.org/10.1016/j.ijmedinf.2021.104483> & Infrastructure Australia. *Mobile telecommunications coverage in regional and remote areas.* Commonwealth of Australia. 2020. www.infrastructureaustralia.gov.au/map/mobile-telecommunications-coverage-regional-and-remote-areas

⁷⁵ Australian Government. The Treasury. (25 September 2023) Working Futures: The Australian Government's White Paper on Jobs and Opportunities Ch 3, p 58. <https://treasury.gov.au/employment-whitepaper/final-report>

⁷⁶ Kukulja, K., Australian Broadcasting Corporation (ABC). (11 August 2023) Chronic shortage of Indigenous interpreters in Australia's legal system risks violating human rights. <https://www.abc.net.au/news/2023-08-11/law-report-investigates-indigenous-court-interpreter-shortages/102696730> ; Armstrong, K. Special Broadcasting Service. (SBS) (2 August 2016) 'Significant Problem' : why a lack of interpreters is putting health of migrants at risk. <https://www.sbs.com.au/news/article/significant-problem-why-a-lack-of-interpreters-is-putting-health-of-migrants-at-risk/0ut9qz57>

unique transferable skills, and attributes of RRR women, parents, and families;

- 3. If a NSP is implemented it should be used to support health, disability, and aged care workers in rural settings to work across these settings. The NSP should be used the same way in education and early education and care in rural settings, for workers to work across these settings;***

- 4. NRWC are urging the Australian Government to set International Standards and incorporate a 'cultural passport'⁷⁷ into the NSP, if the NSP goes ahead. NRWC advocate as per 'Our Common Agenda'⁷⁸ that we do not leave ATSI women and children in RRR Australia behind;***

- 5. NRWC and ICPA (Aust) would advocate for an audit of the current platforms and their current user engagement, including initial and ongoing use and outcomes, before spending \$9.1 million⁷⁹ on a new platform;***

- 6. NRWC and ICPA (Aust) advocate that many RRR women, young women, parents, and families, will simply fall through the gaps of the education***

⁷⁷ Deadly Story. Songlines. https://deadlystory.com/page/culture/Life_Lore/Songlines

⁷⁸ United Nations Secretary General. 'Our Common Agenda: Report of the Secretary General.' (2021) A/75/982 United Nations Economic Social and Cultural Organisation, International Commission on the Futures of Education by the UNESCO. A/75/982

⁷⁹ The Conversation. (26 September 2023) Is it time for Australia to Introduce a National Skills Passport? <https://theconversation.com/is-it-time-for-australia-to-introduce-a-national-skills-passport-214267>

and workforce participation inclusion without serious awareness of what already exists and support to engage with any future initiatives;

7. The development of a NSP would create an opportunity to develop a Standardised National System to provide consistency across all State and Territories of current systems utilised by employers and employees;

8. The NSP should be voluntary and without financial penalties;

9. The NSP should be inclusive to RRR women, parents and families;

10. Transparency of the NSP should be made public, for example how the website will match skills and suggest further education, will this be Artificial Intelligence? It would be good for RRR Australians who use the NSP, to trust the NSP ;

11. Trust and Security should be a key NSP priority. NRWC and ICPA (Aust) position is that at the minimum-security protocols such as are currently used by agencies such as MyGov, Medicare etc should be implemented for data security. Regarding third parties accessing NSP, as this is a digital platform, security needs consideration as does the access for those who are adding data credentials to the NSP. NRWC and ICPA (Aust) advocate for a centralisation with a federal body who had the authority to

enter data on behalf of the Registered Training Organisation (RTO), University, College, or Training Provider. Engagement with a NSP should start from 16 years of age;

12. NRWC and ICPA (Aust) advocate that if \$9.1 million⁸⁰ is to be spent on the NSP, that this be co-designed, with small NSP pilots (with at least one being RRR Australia), to measure NSP engagement and provide further research, quantitative and qualitative studies on:

- *Trust and Security;*
- *Fit for Purpose;*
- *Health and Wellbeing; and*
- *Personal Development;*⁸¹

13. The NSP should attune to meet the RRR critical skills shortage whilst providing RRR women, parents, and families the ability to capitalise on the ‘Technology and New Green Energy Economy;’⁸²

14. Validations needs to be done at a minimum of two (2) levels, the RTO or training provider and again at the authorised data entry point. Validation points should be done by third parties. Non-accredited but verified and validated skills and training are valuable in an NSP. Skill attainment such

⁸⁰ The Conversation. (26 September 2023) Is it time for Australia to Introduce a National Skills Passport? <https://theconversation.com/is-it-time-for-australia-to-introduce-a-national-skills-passport-214267>

⁸¹ Seet, P-S, Jogulu, U., Cripps, H., Nejati, M., 2023. Transforming self-perceived self-employability and entrepreneurship among mothers through mobile digital sharing economy platforms: an exploratory case study. *Personnel Review*, 52(3): 492-520.

⁸² United Nations Secretary General. ‘*Our Common Agenda: Report of the Secretary General.*’ (2021) A/75/982 United Nations Economic Social and Cultural Organisation, International Commission on the Futures of Education by the UNESCO. A/75/982

as work experience and industry training can be both verified and validated. Lived experience, transferable skills and life experience should be able to be incorporated as this is valued in some vocations and informing policy. (For example, mental health and DFSV lived experience advisory boards);

15. The NRWC and ICPA (Aust) maintain that the Australian Federal Government needs to maintain ownership of the process of the development and implementation of the NSP to ensure the integrity of a NSP, if the NSP is to be implemented;

16. The NSP must not come at the expense of watering down employee's EEO and legal protections;⁸³ and

17. The NRWC advocate Women and Children's Safety must be implemented into any 'NSP.'

Please contact NRWC CEO Keli McDonald or ICPA (Aust) President Louise Martin if you have any questions or require further information.

⁸³ Ibid 39, 40, and 41.

Yours Faithfully,

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Drafted, researched, and edited by Megan A Johnson, Policy Officer NRWC.



“The National Rural Women’s Coalition works to support and grow vibrant rural, remote and regional communities throughout Australia.”

