

Department of Employment and Workplace Relations
Via email
AustralianApprenticeshipPolicy@dewr.gov.au

To whom it may concern

Apprenticeship Support Services Consultation Paper

The Civil Contractors Federation, the peak industry body for the civil construction industry, thanks the Department for the opportunity to provide feedback on the Apprenticeship Support Services Consultation Paper.

This submission should be read in conjunction with CCF's commentary in the Peak Bodies and Industry Groups Roundtable meeting on 12 May 2023.

CCF welcomes the Government's commitment to provide apprentices with greater support in areas such as mentoring, tailored communications and other initiatives to improve completion rates. A skilled and well-trained civil construction workforce is a critical and core requirement to support a thriving and sustainable industry that will lead Australia's economic growth. This need is reinforced by the results of the 2023 Civil Contractors Federation National Infrastructure Market Capacity Survey, which found a majority of civil construction companies believe the biggest risk to their ability to successfully deliver on infrastructure projects is the availability of local skilled tradespeople & professionals.

Notwithstanding our general support for the Government's intent to increase completions through more targeted support, CCF provides the following comments for consideration:

- The Government's commitment to create 300,000 fee-free TAFE places in critical sectors across the economy presents challenges for private Registered Training Organisations (RTO), whose involvement in the Apprenticeship Support Services initiative appears to be limited. CCF believes there is an opportunity to more effectively harness the capacity and capability of private RTOs to help achieve the Government's objectives to increase apprenticeship completions as outlined in the consultation paper. This includes the provision of appropriate government funding to provide appropriate apprenticeship support services.

By way of background, CCF operates 'CivilTrain' which is one of the largest private Registered Training Organisations (RTOs) in the civil construction sector. CivilTrain is registered with the Australian Skills Quality Authority nationally, and its programs include qualifications under the nationally recognised Civil Construction Training Package and various state endorsed industry and regulatory courses.

- As part of our commitment to improve industry sustainability, CCF supports initiatives that reduce red tape and inconsistent regulatory practices and approval processes. We work proactively with government to ensure industry is not burdened with instances of jurisdictional duplication which may cause confusion and inefficiency. CCF believes that as a general principle, Federal Government decision making should recognise the primacy of the states in areas where they have demonstrated experience, skills and expertise. This includes training delivery and support.

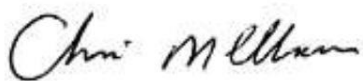
In this case, CCF supports the Government's apprenticeship support initiative being channelled through existing delivery frameworks at the state and territory level that are proven to be both effective and efficient, with funding conditional on the achievement of clear outcomes/KPIs by jurisdictions. The Commonwealth should not, however, be too prescriptive about the way these outcomes should be achieved, or even worse impose 'one size fits all', centrally-managed programs on the states.

- As outlined in our submission on the Australian Apprenticeship Services and Supports Discussion Paper in December 2022 ([click here](#)) CCF contends that one of the most effective ways to boost completions in the infrastructure sector is to classify civil occupations as major trades within the Australian and New Zealand Standard Classification of Occupations (ANZSCO) Coding system. The current ANZSCO code system does not accurately reflect the occupations within the civil construction industry, and where it does the skill level requirements are at too low a level. These skills include bridge, road and tunnel constructors, civil plant operators, pipe layers and line markers. As the Department would be aware, listing on ANZSCO is a pre-requisite for being listed on Australian Apprenticeships Priority List (AAPL) and subsequent government funding under the \$2.4 billion federal government Australian Apprenticeships Incentives Scheme (AAIS).

CCF therefore urges the Department of Employment and Workplace Relations to work with the Australian Bureau of Statistics to address the anomaly whereby civil occupations are not reflected as major trades in the ANZSCO and therefore unable to access government incentive funding under the AAIS. Specifically, we seek the Department's support to encourage the ABS to appropriately classify civil occupations when the ABS undertakes its review of construction occupations in the ANZSCO in 2023. Action in this area is critical to addressing the Government's objectives to drive up the apprenticeship completion rate in civil occupations, to encourage and support apprentices from diverse backgrounds and to provide more targeted support for current and future needs of apprentices and employers.

Thank you for providing CCF with an opportunity to provide feedback on this important initiative. Please do not hesitate to contact me if you require any further information in relation to this submission.

Yours sincerely



Chris Melham
Chief Executive Officer
Civil Contractors Federation (National)
22 May 2023