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The Committee Secretary Ms Poala Cerrato-D'Amico Joint Standing Committee on Migration Parliament House CANBERRA ACT 2600

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Dear Poala,

# RE: ElectroComms & EnergyUtilities Industry – submission to the Joint Standing Committee on Migration.

Thank you for the opportunity to provide a submission to the Joint Standing Committee on Migration's current inquiry into skills recognition, upgrading and licensing.

The ElectroComms & EnergyUtilities Industry Skills Council, trading as EE-Oz Training Standards, is one of the nine recently declared National Industry Skills Councils, and has been chartered by the Australian Government to represent the training interests of Australia's Electrotechnology, Communications, Gas, and Electricity Supply industries.

A Board of Directors, comprised of key industry representatives, leads EE-Oz Training Standards, and the organisation is currently the peak vocational education and training (VET) advisory, and competency standards and qualification setting body for Australia's ElectroComms & EnergyUtilities industries.

The ElectroComms & EnergyUtilities industries are currently beset by severe skills shortages, particularly in the 'trade' occupations, and recent studies indicate little reprieve in the short to medium term.

In this light, EE-Oz Training Standards is pleased to see, and supports the continued listing of, Electrical Powerline Tradesperson, Electrician (general & special class), Electronic tradesperson (equipment & instrument) and Refrigeration and Air Conditioning mechanic occupations on the Australian Government's Migration Occupations in Demand List (MODL).

The Board also supports the inclusion in Clause 3.3 of the Uniform Assessment Criteria documentation of the wording "Accepted applicants may be subject to State Government licensing or registration requirements", as this is particularly pertinent to a number of trade vocations covered by the ElectroComms and EnergyUtilities suite of National Training Packages.

An Australian Government declared industry Skills Council for ElectroComms and EnergyUtilidies

PROVIDING ENERGY SKILL STANDARDS

In terms of opportunities for improvement in regard to the Committee's terms of reference for the inquiry, the EE-Oz Training Standards Board offers the following:

## 1. Opportunities for improvement of current arrangements for overseas skills recognition and associated issues of licensing and registration.

Whilst improvements to recognition processes should always be pursued ipso facto, as a means of aspiring towards excellence, the existing practice of utilising an expert agent such as Trades Recognition Australia (TRA) for coordinating trade vocation assessments for migration purposes is supported. The use by TRA of specialist technical committees to assess applicants against Australian standards enhances security for all Australians. The advantage of this arrangement is that it can significantly reduce opportunities for deception in skills and qualification recognition. However, improvements in quality processes are always welcomed and needed. Notwithstanding, at minimum they must enshrine the following tenants in order to assure transparency and the maintenance of quality processes:

- 1. A transparent benchmark for which those migrating to Australia for a given skill standard are to demonstrate. (The evolving National Skills Framework established by all Minsters of Vocational Education and Training provides the industry competency skill standards for benchmarking. Typically, these are contained in ministerially endorsed National Training Packages. Most have incorporated or aligned licensing and recognition arrangements.)
- 2. Prospective overseas migrants wishing to migrant to Australia must at minimum hold equivalence to the generic skills contained in the relevant industry National Training Packages; they will without doubt once arriving to Australia need to undergo gap training related to critical local context requirements, such as:
  - i). OHS regulation applying to the Australian environs, and
  - ii). Relevant literacy issues, and/or
  - iii). Regulatory applications.

(Attempting to dilute in anyway these three critical pillars from augmenting the skill standards benchmarks for which migrants must demonstrate once in Australia is, to expose employers and associated workers to risk of life, injury, commerce and/or property and the community at large.)

- Assess and benchmark overseas qualifications and/or skills recognition arrangements using respective Australian National Training Package qualifications/competency skills standards.
- 4. Establish and publicise memorandums of understanding (MOUs) between like Australian Industry Skills Bodies and those of other countries, as to skilled equivalences; including identifying relevant critical gaps in training, related to the three pillars mentioned above.

- 5. Maintain an intermediatory expert coordinating body that will facilitate the points above, and ensure:
  - a. Streamlined processes and gain efficiencies through economies of scale
  - b. Retention and holding of MOUs
  - c. Maintenance of the MODLs,
  - d. Maintenance of intellectual information on Country vocational training and credentialing systems
  - e. Information held is authoritative, transparent and can be used for promotion and communication within Australia, to Australian embassies, and other Country's' skills agencies/bodies.

Implementing the above arrangements will improve efficiencies in:

- streamlining migrant assessments prior to migration,
- streamlining migrant assessments for those who seek assessment/registration/upgrading after arrival in Australia, and
- establishing relevant programs (inc. bridging) for those after arrival or temporary residents who seek skills assessment/recognition, or for Australian citizens returning after significant times overseas with overseas qualifications.

In relation to EE-Oz Training Standards specific coverage of ElectroComms and EnergyUtilities, it has long recognised that local standards of workplace safety and work compliance such as the Standards Australia/New Zealand electrical wiring rules, limit overseas trained persons having skills equivalence to that of Australian trained persons. To this end EE-Oz Training Standards have identified the generic skills expected of a tradesperson (e.g. electrical) in Australia and identified the critical gap training that would be required to make them equivalent to bring them to the Australian standard. In addition to competency based performance standards from pre-trade to paraprofessional level EE-Oz Training Standards has developed a wealth of material to support training and assessment. These include:

- Tools to assist the assessment process,
- Competency standards for licensing registration for electrical, data communications and refrigeration and air conditioning trades,
- Requirement for licensing registration translated to learning and assessment material.

EE-Oz Training Standards in its declared role as an Industry Skills Council can act in effect as a technical specialist committee for its industry area. However, it has no authority to operate and resource such activity. EE-Oz Training Standards would be well placed to support an Australian skills recognition intermediatory body for its industry area of expertise. In recognising the need to establish benchmarking with other countries EE-Oz Training Standards has in relation to its coverage established MOUs with New Zealand under the TTMRA for the Electricity and Electrotechnology Industry using the Australian Electrotechnology, ESI – Transmission, Distribution and Rail Sector, and ESI - Generation Sector Training Packages and overseas equivalents. The MOUs where submitted to DEST/ANTA for declaration and authorisation under the TTMRA.

EE-Oz Training Standards has also been involved in other overseas benchmarking discussions with like bodies/organisations in the UK and South Africa for Electricity Supply Industry (ESI) lineworkers. This vocation is currently a skill shortage in Australia and Australian ESI companies are attempting to directly lure overseas lineworkers to Australia. They use the respective EE-Oz Training Standards Training Package skill competency standards as a benchmark for initial assessment, recognising the need to provide training in the three critical pillars mentioned above once the person arrives in Australia. They have direct control of the process and can respond to their duty of care employment arrangements.

Whilst this approach can be readily resourced by an ESI Company with EE-Oz Training Standards support, where needed, this is not possible in relation to contracting companies servicing the Industry. They do not have the resources or the wear with all to learn about the processes, manage, administer, or assess the quality of overseas personnel with relevant skills they may be seeking.

This scenario equally applies to many contractors across the ElectroComms and EnergyUtilities Industry and in particular, to small businesses, which represent are large and constantly growing proportion of where employment occurs. Without the support of quality intermediatory mechanisms of overseas skills assessments, they are limited in the prospects of expanding their businesses. Equally, if quality systems are not provided their businesses are exposed to significant risk if they are unable to confirm the quality of the skills of an overseas credential.

## 2. How Australia's arrangements compare with those of other major immigration countries.

Some countries like Australia have embarked on a competency based system for vocational education and training albeit with different approaches and structures.

EE-Oz Training Standards is active in promoting the adoption of the competencies under their coverage by overseas agencies. In one area of coverage interest has been expressed in submitting competency standards to an international standards body for review and eventual adoption. Although these strategies do not help the current issues they will go a long way to dealing with chronic skill shortages and global portability in the future.

As mentioned under the Trans Tasman Agreement EE-Oz Training Standards and their New Zealand equivalent bodies (ESITO/ETITO) have formally mapped equivalent qualifications for direct recognition.

There are ten ministerially declared national ISCs covering Australian Industry. An intermediatory body is needed as a repository and vehicle to coordinated areas of expertise. The ISCs could act as technical specialist advisory committees to it to ensure quality outcomes for all, and as mentioned above for small businesses.

#### 3. Opportunities for improvement of Australia's procedures in terms of:

#### a. Communication of processes to users

A clear and transparent understanding of what the work of a particular trade entails in Australia, the standards expected and process of assessment is likely to deter spurious applicants. Such communications are best person to person or group in the first language. Additionally, an intermediatory body with appropriate industry technical specialist networks would have the expertise and processes to provide quality advice and promotion.

#### b. Efficiency of processes and elimination of barriers'

The competency based approach taken by Australia and deployed by EE-Oz Training Standards through ministerially endorsed Training Packages, has eliminated artificial barriers to a qualification and recognition without compromising quality.

### c. Early identification and response to persons needing skills upgrading

See 1 above. Critical gaps as mentioned above are identifiable.

### d. Awareness and acceptance of recognised overseas qualifications by Australian employers

An issue not yet well addressed in gap training for persons with recognised overseas qualifications is, the Australian work culture which is beyond workplace safety and the like. Incorporating this into gap training may not only assist in employer acceptance but make it more comfortable for the immigrant.

## e. Achieving greater consistency in recognition of qualifications for occupational licensing by state and territory regulators,

The competency standards developed by EE-Oz Training Standards through the ministerially endorsed Training Packages are national and incorporate the requirements of all states and territories.

### f. Alternative approaches to skills assessment and recognition of overseas qualifications

Whatever approach is preferred it must at a minimum enshrine the suggested rationale outlined above, thus ensuring quality and consistency in assessment and advice outcomes for Australia. Failure to have transparent process leads to opportunities for credential deception and ultimately exposes Australian businesses and the community to risk.

EE-Oz Training Standards would be happy to provide any additional information, including verbal testimony, which the inquiry may require in support of this submission. We are also able to provide, given sufficient notice, direct testimony from employers in our industry groupings who are participating in the new national training system regarding the benefits for enterprises and workers that this demands.

Please contact the undersigned in the first instance.

Yours sincerely,

Tony Palladino Chief Executive Officer

Cc State/Territory Industry Training Advisory Boards Minister for Education Science and Training, the Hon Dr Nelson, MP Minister for Vocational & Technical Education, the Hon Mr Hardgrave, MP DEST – Mr Andre Lewis

Minister for Employment and Workplace Relations, Hon Kevin Andrews, MP DEWR – Department Secretary, Mr Peter Boxall

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