

The Hon Brendan O'Connor MP
Minister for Employment Participation
Parliament House
CANBERRA ACT 2600

Dear Minister O'Connor

The TAFE NSW – Language, Literacy & Numeracy Program (LLNP) Steering Group welcomes the opportunity to work with you and your Department on improving the range and structure of employment services and programs provided by the Australian Government. The Department's combined areas of responsibility of Education, Social Inclusion and Workplace Relations provides a unique opportunity to positively impact on the most marginalised in our society.

We appreciate your Government's long-overdue emphasis on education in all sectors but are concerned that during the election campaign and in initial policy releases to date there have been few references to new policy or programs focusing on adult literacy, numeracy or English language programs which are key to the success of quality employment services.

The Steering Group represents all TAFE NSW Institutes and OTEN (Open Training & Education Network) who are currently contracted to deliver LLNP. Since 1 July 2006 this Program has generated approximately \$24 million and has provided Language, Literacy & Numeracy services to over 5,000 clients. As well, membership includes representatives from the NSW Department of Education and Training's Multicultural Education Unit and Access & General Education Curriculum Centre. This Group was formed in January 2002 to provide consistent and quality program delivery across the TAFE NSW. We have concerns about whether the LLNP, in its current structure, is able to provide the key outcomes required for learners needing to increase their essential skills in order to access meaningful employment and meet the objectives of the Government's Social Inclusion agenda.

Our comments and suggestions below, identified in *italics*, focus on the objectives identified in the Government's Social Inclusion and Skills policies.

1. Employment services are relevant to the circumstances and needs of the jobseeker and prospective employer

Issue #1:

Inflexible LLNP guidelines that are too rigid and prescriptive in specifying achievements required in each 160 hour block. This negates theories and practice of adult language and literacy learning. TAFE NSW, who provides LLNP, have qualified and experienced staff that are able to identify learner needs and gaps and plan programs that will allow learners to develop customised programs to meet those needs in skills gaps areas. In the Language, Literacy & Numeracy Program there is no flexibility and opportunity to customise programs that address skills shortage areas.

Suggested improvement #1:

More creative training solutions such as:

- *collaborative programs with community organisations and local employers as partners would be more relevant to the needs of some learner groups but fall outside current LLNP guidelines*
- *programs for groups such as recent refugees from African communities and clients with disparate levels of oracy and literacy*
- *programs for clients with disrupted education or for Aboriginal clients in isolated communities who need individual solutions in terms of program design*

These cannot be accommodated under current LLNP guidelines.

Issue #2:

LLNP clients with family responsibilities, especially sole parents, demonstrate a high level of absenteeism and have difficulty meeting the minimum weekly hours of training required, particularly during school holidays. Many such clients cannot access programs due to lack of childcare places.

Suggested improvement #2:

More community-based programs in school hours need to be made available to this client group. Regional and Rural areas have poor access (if any) to public transport particularly in school holiday periods. There is the need for a transition period to ease these clients into training i.e. from 5 to 10 to 15 hours per week so that they learn what support services are available in Australia and how to access them.

Issue #3:

Close to 70% of migrants have overseas-gained qualifications, skills and experience. Many of these new arrivals, including those with high levels of proficiency in English, require access to gap training combined with employability skills training for the Australian labour market to gain employment in their area of specialist skill. The LLNP does not address the needs of these skilled migrants and limits their contribution to skills shortage areas.

Suggested improvement #3:

There is an immediate need for a specialist service that can be accessed by skilled migrants and provides them with employability skills and gap training as required for their area of expertise. This would address skills shortage areas and reduce the number of skilled migrants who access entry level employment and do not work in the area of their skills and qualifications.

The Australian Government should consider resourcing the development and implementation of a complementary skilled migrant employment and training program to assist these entrants, including those who are under-employed to use and/or develop the skills necessary for meaningful and sustainable employment in Australia.

Issue #4:

The training needs of adult humanitarian entrants and young people (19-24 years) who have had little or no access to formal schooling and limited employment experience, particularly those from the African region need to be more adequately addressed. These humanitarian entrants generally need access to vocational education and training pathways over a much longer duration with multiple entry points and with sustained learner support that often includes bilingual support as well as an intensive integrated English language and literacy training.

The current model that pays financial incentives to Job Network Members for clients' employment outcomes is of concern to us as educational providers dealing with the same clients. In some instances these clients are being removed from training programs that would improve their language, literacy and employability skills to undertake unsuitable employment not well matched to their skills and experience. Often employment for such clients is short term and then many return to the classroom with decreased levels of language, literacy and confidence.

Suggested improvement #4:

It would seem more sustainable both for individuals and communities for clients to have the opportunity to obtain a relevant vocational qualification as well as the underpinning language, literacy and employability skills instead of a short-term job. More individual career planning and pre-vocational programs is required for such clients.

2. Incentives for training that will improve the employability of jobseekers including incentives for long term training and education to address labour market needs

Issue:

TAFE NSW – LLNP Steering Group members agree that a revised incentives system for long-term training and education will enhance the employability of jobseekers and assist with placement into sustainable employment. Currently LLNP Providers are being disadvantaged by placing LLNP clients in employment that is not considered an outcome for training providers. When clients gain employment during a training program, a provider's Key Performance Indicators (KPIs) can be adversely impacted as this outcome can only be recorded as a withdrawal that affects KPIs linked to retention rates. Unless other arrangements outside of the LLNP contract are made, the student fails to attain the qualification in which they were enrolled.

Suggested improvement:

There needs to be greater incentives for clients to gain qualifications that will lead to more sustainable job outcomes, particularly in identified skill shortages areas. In the current climate of national skills shortages, this issue needs to be addressed to get the balance right between employment versus course completion outcomes.

There is also the need for closer partnerships and alliances between Job Network Members, RTOs, Community organisations and Industry groups to provide a more effective and seamless service and appropriate programs for individual jobseekers.

Personalised, flexible arrangements to achieve sound education and training outcomes are needed for jobseekers as an incentive. If an employment outcome is not immediately obtained, a Job Network Member must find alternative approved activities such as training for the jobseeker. Some of the requirements of the current Participation Agreements are at odds with sound educational outcomes. For example, the requirement that recipients of the Parenting Payment be placed in an approved activity for a minimum of 20 hours per week has resulted in a significant demand by both enrolling students and Job Network Members. With this new requirement, jobseekers with family responsibilities demonstrate a high level of absenteeism even in programs where relatively few hours are offered particularly during school holidays. This is made particularly difficult in an environment where there is a shortage of childcare places.

The requirement that training places be programmed for known absentees also reduces our ability to provide training places for those not eligible for Job Network assistance particularly in certain areas of delivery such as English as a Second or Other Language. Whilst it is possible to split the activities required to fulfil welfare obligations i.e. 10 hours of training and 10-20 hours of job search activities, there is little motivation either on behalf of Job Network Members or jobseekers to do so.

3. Jobseekers with higher levels of disadvantage receive intensive assistance

Issue:

In times of current high employment, many clients accessing employment programs have multiple areas of disadvantage and are incapable of completing the required number of weekly, specialised training hours. These clients have high levels of absenteeism and do not achieve required outcomes.

Suggested improvement:

More individual, negotiated arrangements are required for such clients so that they can overcome their disadvantage and access meaningful employment.

4. Performance management principles including star ratings and business reallocation that support sustainable outcomes and promote quality service delivery

Suggestion improvement:

The TAFE NSW – LLNP Steering Group believes that performance management of Job Network Members should be reviewed to ensure that:

- *skills shortages within the labour market are addressed by referring clients to employment they are trained for and not just manual or low skills jobs*
- *as a recognised outcome, clients should be referred to training that matches skills gaps areas*
- *jobseekers are properly equipped with language, literacy and numeracy skills, as well as vocational and employability skills that are transferable across a range of vocations before being placed in employment*
- *jobseekers are provided with user choice both when selecting Job Network Members and educational/training providers*

5. The minimisation of time and money spent on administration

Issue:

The Language, Literacy & Numeracy Program requires micromanagement in order to meet Commonwealth contractual requirements. This demands significant amounts of time to administer the program. Flexibility must be given to focus resources on clients rather than labour-intensive reporting and administration.

Suggested improvement:

We support any improvement in efficient program administration including an IT system that has a number of reporting functionalities and the ability of the system to interface with other agencies information such as Centrelink and Job Network Member LLNP client records.

All TAFE NSW Institutes currently delivering the Language, Literacy & Numeracy Program (LLNP) have the capacity and experience to provide Job Placement Services, initial or concurrent core skills development and the full range of vocational training including Multicultural support and counselling services.

The TAFE NSW – LLNP Steering Group would value the opportunity to meet with your Department to further discuss programs and services and we look forward to hearing from you regarding this submission.

Yours sincerely

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