



Brotherhood of St. Laurence
Working for an Australia free of poverty

Jobs and Skills Australia Act review

Brotherhood of St. Laurence

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For further information or to discuss this submission, please contact:

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Summary

The Brotherhood of St. Laurence (BSL) welcomes the review into the operation of the *Jobs and Skills Australia (JSA) Act 2022*. BSL is a social justice organisation working towards an Australia free of poverty. Our purpose is to advance a fair Australia through our leadership on policy reform, our partnerships with communities and the quality of our services. Our approach is informed directly by people experiencing disadvantage and uses evidence drawn from our research, together with insights from our programs and services, to develop practical solutions that work.

BSL makes several recommendations in response to the terms of reference of the review.

Recommendations

Recommendations for changes and or additions to JSA functions under the act

1. JSA should expand its work program to explicitly include research and advice on areas including under-utilisation, strengthening employment enablers, supporting long-term unemployed people into work, and skills recognition.
2. A commissioner-level role should be established in JSA with a specific focus on skills and credit recognition. JSA should undertake a specific program of work to identify implementation options for a nationally coordinated skills and credit recognition system.

Recommendation for additional analysis and reporting

3. JSA should include analysis of intersecting demographic characteristics in the next phase of the Vocational Education and Training National Data Asset (VNDA) program. This should include

combined analysis of gender, where people live, previous education, language background, migration status, Indigeneity and disability.

Recommendation for additions to JSA's stakeholder model

4. JSA should allocate at least three membership positions in the yet to be established Education and Training Advisory Group to community organisations working with learners and jobseekers who are under-represented in training and the labour force.

Recommendation for evolving JSA's operating model

5. JSA should include up to three membership places on the Ministerial Advisory Board for representation from community organisations working with and representing priority learner, jobseeker and worker cohorts. This should be seen as a means to strengthening insight of the intersecting system conditions impacting and enabling access to and outcomes from training, and access to employment.

Evolving JSA's current functions under the Act (ToR 1)

BSL strongly endorses JSA as a key economic advisory body to government, and a critical function within the Department of Employment and Workplace Relations. As an organisation working to alleviate poverty, in all its forms, we see a critical role for JSA in producing and releasing public data and evidence that highlights how the skills and employment systems are, and are not, working for learners, jobseekers and communities experiencing disadvantage.

BSL considers that JSA's functions can be strengthened to enhance alignment with government priorities (TOR 1c) in the following areas:

- Greater analysis and reporting on how to reduce structural underutilisation of labour and skills (e.g. skills gaps, geographic barriers, discrimination).
- Development of options to strengthen learning and employment enablers including employment services, childcare and education.
- Finding ways to better support long-term unemployed Australians into work.

These areas can support the government's productivity agenda, reduce barriers to work – particularly for people experiencing disadvantage, and contribute to a more inclusive labour market. These priorities are consistent with those articulated in *Working Future: The Australian Government's White Paper on Jobs and Opportunities*.

In addition, BSL believes JSA's current work program lacks sufficient focus on improving the recognition of skills at a national level. BSL recommends that JSA prioritise research and advice to government directed at improving how qualifications – both local and international – are recognised and help build a unified national system for skills and credit recognition.

Government has shown strong interest in skills recognition during its second term. At the Economic Reform Roundtable in August, the Treasurer highlighted the need to better recognise qualifications

and improve credit transfer.¹ On 16 October, Home Affairs Minister Tony Burke expressed concern that many skilled migrants, especially humanitarian entrants, international students and those without sponsorship, are working below their qualification level due to delays or barriers recognising overseas credentials.²

As a member of the [Activate Australia's Skills campaign](#), BSL also recommends establishing a commissioner-level role within JSA directed at improving skills and credit recognition, and that JSA examine options for a nationally coordinated skills and credit recognition system.

Addressing social and economic exclusion is central to alleviating poverty in Australia. Timely and relevant insight into the impact of structural barriers will support policy and practice change to reduce labour market exclusion. The research undertaken by JSA so far has been beneficial in understanding returns on investment from qualification completion, changes needed to address gender inequality, and improvements to the architecture of the skills system itself. However further focus is needed on structural inequality, and the structural and systemic contributors to inequity and exclusion in skills and employment.

Recommendations for changes and or additions to function under the act:

1. JSA should expand its work program to explicitly include research and advice on areas including under-utilisation, strengthening employment enablers, supporting long-term unemployed people into work, and skills recognition.
2. A commissioner-level role should be established in JSA with a specific focus on skills and credit recognition. JSA should undertake a specific program of work to identify implementation options for a nationally coordinated skills and credit recognition system.

BSL understands that these recommended functions are not prevented under the current Act, however the current JSA work program does not explicitly include the areas noted above, and the structure of JSA does not currently include the role suggested above. These recommendations are consistent with the review ToR that include consideration of JSA's current functions under the Act.

Effectiveness of JSA reporting and advice (ToR 2)

Since its launch in November 2022, JSA has delivered strong analysis on skills and employment systems. However, its public reporting lacks intersectional data and there is limited insight into how overlapping factors affect access to training and jobs. Under-represented learners and jobseekers often face 'bundles' of barriers to training and employment, including where they live, access to services and their historical experiences of the education, training and employment. JSA does not currently publish data that illustrates the impact of cumulative factors inhibiting access to training and work. Examples of how people experience cumulative barriers include:

- Women from non-English speaking backgrounds who live in regional and remote areas.

¹ Press conference, Treasurer Jim Chalmers MP, 21 August 2025.

² Transcript, National Press Address, Home Affairs Minister Tony Burke MP, 16 October 2025.

- Young people living with a disability who live in low-socioeconomic regions.
- Older workers with low education attainment who live in outer metropolitan areas.

While BSL welcomes the inclusion in JSA's VET National Data Asset (VNDA) program of additional demographic characteristics (e.g. First Nations, gender, disability and location), further work to analyse and report the impact of intersecting barriers and demographic factors faced by learners and workers is needed. BSL recommends that JSA include intersectional analysis and reporting as part of the next phase of the VNDA program. This intersectional reporting should prioritise analysis of combined factors known to impact access to and outcomes from training and work, including gender, where people live, previous education, language background, migration status, Indigeneity and disability.

Recommendation for additional analysis and reporting

3. JSA should include analysis of intersecting demographic characteristics in the next phase of the VNDA program. This should include combined analysis of gender, where people live, previous education, language background, migration status, Indigeneity and disability.

While intersectional analysis is not prevented under the current Act, it is not analysis that JSA has published to date. BSL is providing this recommendation in line with the ToR that includes consideration of JSA's current functions under the Act.

JSA's stakeholder model (ToR 3)

To improve JSA's stakeholder model, BSL recommends increasing engagement with, and input from, community sector and civil society organisations, charities and support services. This would complement existing JSA engagement with education providers, industry, and unions who currently provide a focus on workforce development and policy outcomes. Civil society groups and community sector input can offer additional insight into areas where current training and employment systems fail to support disadvantaged and marginalised jobseekers and learners with whom we work. This can include insight and advice on potential improvements based on our direct experience of working with young jobseekers; migrants facing barriers to their skills and qualifications being recognised; older workers re-skilling and upskilling; working with jobseekers and learners in thin training and labour markets in regional Australia; inclusive employment programs and other demonstration projects; and service delivery with under-represented learner and jobseeker cohorts.

BSL notes that the JSA's Education and Training Advisory Group is yet to be established. This presents an opportunity for JSA to prioritise at least three membership opportunities for community stakeholders in this group.

Recommendation for additions to JSA's stakeholder model

4. JSA should allocate at least three membership positions in the yet to be established Education and Training Advisory Group to community organisations working with learners and jobseekers who are under-represented in training and the labour force.

BSL understands this change may require amendment to the Act.

JSA's operating model (ToR 4)

BSL believes the JSA operating model should align with its stakeholder model (discussed above). The current JSA Ministerial Advisory Board reflects JSA's 'tripartite' engagement with education providers, industry and unions, but lacks representation from community organisations that support priority and under-represented learners, jobseekers and workers. Of the 15 available seats, four are currently allocated to people with lived experience of systems and disadvantage. BSL strongly supports retaining lived experience representation, to ensure the Board has direct understanding of the impact of policies and systems impacting on learners and jobseekers. However, BSL notes there is no representation from community organisations who work with learners, jobseekers and workers experiencing disadvantage. Community organisations would complement the lived experience perspective and bring a broader systems lens to the challenges in the current system, and opportunities for reform – informed by experience working directly with people experiencing disadvantage. The JSA operating model could be strengthened through inclusion of up to three community organisations on this key advisory group – without reducing the current representation of lived experience members.

BSL's Regional Roadmap submission³ highlighted the need to actively involve community organisations with deep expertise in engaging under-represented groups. The inclusion of this perspective on the Ministerial Advisory Board would bring much-needed expertise to support analysis and Ministerial advice on the systemic opportunities for widening workforce participation, addressing structural barriers to training and supporting economic productivity.

Recommendation for evolving JSA's operating model

5. JSA should include up to three membership places on the Ministerial Advisory Board for representation from community organisations working with and representing priority learner, jobseeker and worker cohorts. This should be seen as a way to strengthen insight into the intersecting system conditions impacting and enabling access to and outcomes from training, and access to employment.

BSL understands this change may require amendment to the Act.

Fiscal environment

The ToR advise that recommendations should be conscious of fiscal environment.⁴ BSL considers that the recommendations above would involve little or no additional expenditure. BSL also considers that strengthening JSA's functions and effectiveness can assist in easing fiscal pressures in the medium to longer term by improving learning and employment outcomes, resulting in benefits in areas including productivity growth, reduced income support and increased tax revenue.

³ Brotherhood of St. Laurence 2025, *Submission to Jobs and Skills Australia Regional Roadmap Phase 1*.

⁴ [Terms of Reference - Jobs and Skills Australia Act 2022 Legislated Review.docx](#)