



## AUSTRALIAN HOTELS ASSOCIATION

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[nsnlreview@employment.gov.au](mailto:nsnlreview@employment.gov.au)

To the Department of Employment, Skills, Small and Family Business,

### **RE: REVIEW OF THE AUSTRALIAN APPRENTICESHIPS NATIONAL SKILLS NEEDS LIST**

The Australian Hotels Association (AHA) and Tourism Accommodation Australia (TAA) welcome the opportunity to make a submission to the review of the Australian Apprenticeships National Skills Needs List (NSNL).

The AHA and TAA are the peak industry bodies representing Australia's tourism, hotel accommodation and hospitality industry. Our membership is diverse and serviced by a network of branches based in every state and territory, plus a Canberra-based National Office. Our membership represents licensed businesses from small bars, restaurants, taverns, pub-style hotels through to three, four and five-star international accommodation hotels located in each state and territory.

Our role is to represent the best business and commercial interests of our members through services, advocacy, and policies. We are committed to ensuring the future development and growth of the sector within Australia's vibrant tourism industry.

The AHA and TAA recognises the importance of working with government departments and stakeholders and we have a demonstrated history of achievement in working with national, state and local government, law enforcement agencies, educators, universities, and other organisations.

#### **THE NATIONAL SKILLS NEEDS LIST**

The AHA and TAA agree there is a need to reconsider the NSNL. The infrequency of updates to the NSNL and restrictive criteria have led to a list which is not representative of skills shortages in occupations for which an apprenticeship or traineeship is an entry pathway to the occupation. The Australian Chamber of Commerce and Industry (ACCI) submission recommends the NSNL no longer be used. The AHA and TAA agree this should be a consideration by the Department as it is clear the present NSNL is not suitable. However, in the event of pursuing a review of the NSNL, below is some feedback on the methodology.

Regarding methodology, the AHA and TAA have concerns about regional differences in shortages and stress this needs to be considered in the review. Whilst a 'single coherent approach' would allow for simplification of identifying occupational skills shortages, we urge caution that this does not become a blunt instrument inflexible to deal with variances across industry and location of employers.

AHA and TAA make the broad comment that the language used around apprenticeships sometimes – but not consistently – refers to an inclusion of traineeships. Our sector utilises traineeships as a part of the training process and we request the Department view traineeships as a recognised aspect of industry training, including them consistently in language and communications moving forwards.

Engagement with industry on shortages is needed to ensure incentives are available to employers who need them – AHA and TAA welcome the Department’s openness with industry and urge this to continue.

Although the NSNL review does not seek comment on the structure of the incentives, the AHA and TAA agree with ACCI’s position that incentives are important and welcome the reinstatement of incentives from 2020 for part time and diploma level traineeships.

We look forward to continuing to work with the Department on addressing the important issue of skills shortages and are open to further communications on this topic.

Yours Sincerely,



Stephen Ferguson  
CEO  
Australian Hotels Association



Michael Johnson  
CEO  
Tourism Accommodation Australia