14 June 2024

Aviation Australia's response to the Draft International Education and Skills Strategic Framework

Aviation Australia supports the focus on quality training and education to meet industry needs. Aviation Australia has a proud and long history in the delivery of skilled workforce to domestic and international markets. It has been Aviation Australia's experience that skill shortages are not only local. The advent of globalisation has given a label to a well held practice of overseas aviation markets recruiting from Australia. Therefore, Aviation Australia is actively addressing workforce issues from a domestic and international perspective. This enables Aviation Australia to support the Australian Aviation industry growth through training both domestic and international students in the Civil Aviation Safety Authority (CASA) and European Union Aviation Safety Agency (EASA) regulatory outcomes. Addressing these critical license outcomes ensures that the Australian skilled workforce is more resilient to combat broader aviation workforce pressures.

In relation to the Draft International Education and Skills Strategic Framework, Aviation Australia provides the following feedback:

Objective 1

- Aviation Australia supports the focus and future governance of quality and integrity of skills training. It is important to note that Aviation Australia is an accredited aviation training maintenance organisation with both CASA and EASA approvals. These licensing outcomes provide additional rigour and oversight which exceeds that of the Australian Qualifications Framework (AQF) and is complementary to achieving student learning outcomes and employment prospects.
- Aviation Australia supports reforms on Agent outcomes, although would caution against taking a broad brush view of the education and training industry. We believe the focus should remain on those agents and institutions that recruit students who do not achieve AQF and/or regulatory outcomes ready for industry employment. This focus can address the majority of the concerns about providers and Agents that do not provide quality outcomes in education towards industry employment.

Objective 2

- Aviation Australia agrees that skills needs are critical to establishing a sound and sustainable system. Paramount to this is to acknowledge that a skilled workforce in a global society requires the quality of Australian Training and Education to train international students to return to roles in their home countries. By doing so, this reduces the risk of skilled workforce in Australia being recruited overseas and consequently avoiding a reduction to the domestic workforce. Therefore, Aviation Australia highlights that the focus only on Australian critical skills risks will cause further stress on the aviation workforce if we are unable to support sustainable regional growth in overseas markets. Many of these countries do not have the ability to train themselves or capacity to deliver on their own growth.

- This objective should consider regional and global workforce pressures in setting overall international student numbers within the framework of Australian Skills Needs. This would balance the local, regional and global views to ensure we are not at risk of training Australians for overseas markets at the expense of a domestic view of the problem.

- This objective should also consider that growing a workforce requires experienced and talented Subject Matter Experts (SMEs) to be instructors. For critical skills areas, the Strategic Framework must consider prioritisation of instructional and educational staff who are SMEs in their sector to support growing the Australian workforce. In Aviation Australia's context, recruiting Australian staff to instructional roles is now being undertaken at the expense of the operational and commercial needs of the general aviation and "remote" communities. This has a major impact on the domestic aviation industry's ability to function effectively. Allocation of critical skills growth positioning is fundamental to meet the future workforce needs in the Aviation sector.

- Aviation Australia believes that unaccredited regulatory training is important for delivery onshore. This is critical to standards for regulatory outcomes to Australian and international airlines flying into Australia. Aviation Australia believes that accredited and unaccredited regulatory outcomes that support the Australian aviation industry and those elements that fly into Australia is vital to a safe aviation system for tourism and business outcomes. Removal of this will impact Australian airlines, tourism and business activity through international travel generated by this training.

- Implementation of a new approach needs up to two years to be implemented. Aviation Australia works with businesses (airlines) and customers up to two years before a visa is required for travel. Understanding the housing and cost issues, Aviation Australia moved delivery of training overseas for theory, with the last 12 months comprising of practical components delivered out of our Brisbane Campus. With recruitment starting up to 12 months prior to the course commencement date, this means implementation of changes inside 24 months will impact professional delivery of the attract, enlist and retain models. Moving to a shorter timeline also risks reputational outcomes against the desire to achieve Objective 3 outcomes.

Objective 3

- Aviation Australia is already delivering in multiple countries with both accredited and unaccredited outcomes. The key barrier to this model is the regulatory overheads for both educational licenses and relevant civil aviation accreditation. This is compounded by meeting AQF standards and oversight in other countries. While we will continue to seek opportunity for remediating the aviation workforce shortfalls across the region, the Draft International Education and Skills Strategic Framework should acknowledge the costs and support needed to achieve the outcomes of the objective. This should include grants, cross departmental support and be cross jurisdictional.

Yours sincerely

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