

Submission by the Australian Nursing and Midwifery Federation

Australian Government and Jobs and Skills Australia

Design of a National Skills

Taxonomy

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Federation



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Introduction

1. The Australian Nursing and Midwifery Federation (ANMF) is Australia's largest national union and professional nursing and midwifery organisation. In collaboration with the ANMF's eight state and territory branches, we represent the professional, industrial and political interests of more than 326,000 nurses, midwives and care-workers across the country.
2. Our members work in the public and private health, aged care and disability sectors across a wide variety of urban, rural and remote locations. We work with them to improve their ability to deliver safe and best practice care in each one of these settings, fulfil their professional goals and achieve a healthy work/life balance.
3. Our strong and growing membership and integrated role as both a trade union and professional organisation provides us with a complete understanding of all aspects of the nursing and midwifery professions and see us uniquely placed to defend and advance our professions.
4. Through our work with members, we aim to strengthen the contribution of nursing and midwifery to improving Australia's health and aged care systems, and the health of our national and global communities.
5. An initial concern of the ANMF is that while largely warranted, a vast number of complex and interrelated reforms are occurring in education and training, healthcare, migration, workforce and beyond. The potential benefit, value, and sustainability of a National Skills Taxonomy (NST) is likely to be hampered if the project is rushed and not properly planned, implemented, and developed in a genuinely consultative fashion. Here, wide stakeholder buy-in and support will be necessary for success.
6. The ANMF thanks the Australian Government and Jobs and Skills Australia for the opportunity to provide input into this consultation on the National Skills Taxonomy Discussion Paper and hopes that our feedback can assist in planning, designing, and implementing an effective and fit for purpose NST.



1. Lessons from existing taxonomies

1.1 What are the key benefits and/or limitations from existing taxonomies?

7. Many existing taxonomies offer a well-organized structure that categorises skills into hierarchical levels or domains, making it easier to understand and navigate. For example, the European Skills, Competences, Qualifications and Occupations (ESCO) taxonomy provides a clear structure for categorising skills and occupations. Additionally, established taxonomies often align closely with industry standards and requirements, ensuring relevance and applicability in real-world contexts. The National Occupational Standards (NOS) in various countries exemplify this alignment, helping ensure that skills and competencies are recognised and valued by employers.
8. Existing taxonomies also support career development and planning by helping individuals understand the skills required for different roles and career paths. The National Career Service (NCS) Skills Framework in the UK supports career development by providing detailed information on skills needed for various professions. Furthermore, taxonomies provide a standardised framework for assessing and certifying skills, enhancing the credibility and consistency of qualifications. The Skills Framework for the Information Age (SFIA) offers a structured approach for assessing skills in the IT sector, aiding in professional development and certification.
9. Many taxonomies are also designed to integrate with educational and training systems, supporting curriculum development, and aligning educational outcomes with industry needs. The Australian Core Skills Framework (ACSF) aligns with educational programs and assessment tools, providing a basis for developing relevant training and education. Finally, taxonomies might have application to help organisations and governments plan and develop the workforce by identifying skill gaps and informing training and recruitment strategies. The U.S. Department of Labor's O*NET provides valuable data for workforce planning and development, including detailed information on skills, tasks, and qualifications.
10. As explained by the discussion paper, NSTs have the potential to offer a valuable tool for workforce development, career guidance, education and training and labour market analysis for a range of stakeholders and sectors. The current taxonomies demonstrate a regulatory framework that has



offered quality and safety governance. While they limit transformational growth in the skills sector, they have delivered consistent service provision within defined parameters. In developing and implementing an NST, it will be vital to gain a comprehensive and in-depth understanding of the limitations of existing taxonomies (and how fragmentation is a particular challenge that must be addressed) to be able to address and respond to the variety of challenges that will assuredly arise through the development, implementation, and use of such a taxonomy. Limitations and challenges include limitations in terms of a taxonomy's scope, the degree to which a taxonomy is kept up to date and current, the clear and almost unavoidable complexity that will arise, potential lack of standardisation (or indeed the risk of an overly standardised taxonomy that overlooks important nuances), and the potential costs of developing, implementing, and maintaining a fit for purpose NST now and in the future.

11. There needs to be much more integration between different systems e.g., skills lists, migration, workforce planning. A key limitation of current taxonomies is that they do not integrate well with one and other. There is no single 'best practice' taxonomy that assists workforce development and planning or to align prior learning through educational preparation and training either in Australia or abroad in terms of skill acquisition. This often causes challenges in terms of recognition of prior learning for skill escalation and advancement into a higher qualification and is often evident in the VET sector where a person may have an entry level qualification at a particular specified level (i.e., within an AQF framework) and seek to move to a higher skills level. It is even more problematic where a person may seek to move from a VET qualification to a higher education qualification for the purpose of mapping competencies and educational preparation.

12. An Australian NST may benefit education providers and policy makers via the Commonwealth Government's skill reform agenda to provide an improved mechanism to order skills and skill acquisition into logical categories that align with and/or improve the taxonomies set out in the Australian Qualification Framework. There are also opportunities to provide consumers with an improved understanding of education structures and outcomes and provide a clearer vision to consumers (education providers/employers/graduates/students) about the way skills developed via education and training can be advanced and escalated to ensure and enable lifelong learning pathways.



13. Improved skill taxonomies may also assist to articulate similarities and differences between higher education and the VET sector qualifications, nevertheless any NST work must have sound boundaries and associated governance oversight and ensure that they are working documents that are designed to evolve over time and as the sector introduces new/emerging elements to the original design and intent. Here too, there might be a necessity to consider expanding the proposed scope of the NST to cover younger people as there is an increasing shift towards VET in school aged students.
14. Another identified limitation of existing frameworks or taxonomies is that some have specific and granular definitions of skills while others use broad terminology. This is almost unavoidable and highlights the fact that one size does not fit all. Here, the skills required for one job (or indeed one activity performed by a person in a role) might be singular and straightforward but is actually part of a complex and much more multifaceted set of skills, knowledges, and experiences for another individual or in another profession or role. For example, the skills and abilities of one nurse providing care to a First Nations Person might be very different from those of an Aboriginal and Torres Strait Islander nurse or healthcare worker from a different professional or even social and cultural background. This highlights a concern around how the taxonomy will manage and incorporate skills that are vital but much harder to measure, teach, or 'visualise' in the context of holistic and person-centred care such as empathy and cultural insight. Here, activities like critical thinking, innovation, and creativity might not be easily articulated as skills despite being necessary to many roles and jobs including those in health.
15. The discussion paper highlights that differences in taxonomies/frameworks might be understood as equivalent to two different parties speaking a different language, however this obfuscates and simplifies a very complex situation where it should instead be important to understand that two actors speaking different languages might both have significant knowledge, expertise, and skills that have been formed, developed, and guided by their different languages and perspectives but meet challenges when attempting to communicate or interface. Here, it is vital to acknowledge and understand that different languages underpin different approaches, perspectives, and understandings and that an ambition to simply create a shared, linear, and mutually understandably lexicon/language might result in important insights and differences being lost or unrecognised.
16. The very complexity and multifaceted nature of how different actors and sectors understand and define skills might very well be necessary and the creation of an overarching, single lexicon/taxonomy



might unintentionally lead to a poorer appreciation of the variety of skills and need to understand them from a range of perspectives. An example here is that skills in communication can be variously understood and defined and the nature of these skills and the way they are demonstrated can be quite different and linked to a range of other skills and competencies.

17. Communication skills are and should be considered differently depending on job and context. A health care professional needs different communications skills from a real estate agent and a nursing lecturer or educator will need different communication skills from a nurse working in a mental health clinic. A nurse or midwife must have highly developed communication skills, but the nuances of this skill might be different depending upon their role, place of work, the people they work with, and the people to whom they provide care. Here, a registered nurse working in a primary healthcare clinic that provides care for sexual health for diverse and vulnerable populations is likely to need different skills in communication in comparison to a registered nurse working in a surgical ward. By understanding these benefits and limitations, the design of the new NST can leverage the strengths of existing taxonomies while addressing their shortcomings, ensuring a more effective, relevant, and user-friendly framework.

1.2 What features from existing skills taxonomies are important to retain or address in a new NST?

18. The ANMF highlights that while changes to existing taxonomies are beyond the scope of the current consultation, codes in the current ANZCO framework are relied on heavily in workforce planning, labour market testing, skills shortage lists, and more, yet they are badly outdated and do not connect to real world job titles, descriptions, and labour market activity. This highlights where a proposed NST must seek to improve on existing systems and frameworks to avoid creation of similar redundancies that would limit future fitness for purpose. Changes and the development of a new NST must continue to deliver quality and safety to the standard currently experienced.
19. When designing a new NST, it will be crucial to build upon the strengths of existing skills taxonomies while addressing any gaps or limitations. Key features to retain or address include clear and consistent definitions to provide clarity and uniformity in understanding skills, ensuring each skill is clearly defined to avoid ambiguity. Maintaining a hierarchical structure to organise skills logically, with broad



categories subdivided into more specific subcategories, and including well-defined competency levels (e.g., beginner, intermediate, advanced) to differentiate skills based on proficiency levels, aiding in assessment and development is essential. Aligning the NST with established industry and educational frameworks and standards ensures relevance and consistency with current industry practices. Designing the taxonomy to be flexible and scalable allows it to adapt to changes in technology, industry practices, and emerging skills and research while ensuring compatibility with existing educational and accreditation frameworks that supports alignment with educational curricula and professional certification processes. Usability and accessibility are critical, so the taxonomy should be user-friendly and accessible to a wide range of clearly identified stakeholders, with an intuitive interface and supporting resources. Comprehensive coverage will ensure that the taxonomy captures a broad spectrum of skills, including emerging and specialised areas, while stakeholder involvement in the development process will be needed to ensure it meets the needs and expectations of industry professionals, educators, and other key stakeholders.

20. Including cross-references to related taxonomies and standards will be necessary to facilitate alignment and coherence with other frameworks. Leveraging data and feedback from skill assessments, industry trends, and workforce analytics to inform the taxonomy's design and updates will also be critical. Transparency and documentation will also be important to provide a clear rationale for the decisions behind the taxonomy's design and evolution. By retaining these important features and addressing any gaps or limitations, the new NST can build on existing strengths while providing a robust, relevant, and practical framework for skills across various sectors.

2. Potential use cases for a National Skills Taxonomy

2.1 Where could an NST best add value for individuals, employers, and educators and how?

21. As the discussion paper describes, an NST has potential benefits for users in terms of improved communication and interfaces across sectors, improved and more in-depth labour market insights and analysis, career and job guidance, workforce and career development including on the job/continuing training, and potential benefits for education providers around educational alignment with the job market. Here, the NST must be 'forward thinking' and able to incorporate planning for future jobs and skills needs five, ten, even twenty years from now to better understand what future



education and training pathways will be required to support emerging and necessary skills. One area where value could be gained is where the NST could contribute to enhancing articulation between assistant in nursing/personal care worker (AIN/PCW) and enrolled nurse (EN) roles and EN to registered nurse (RN) roles so that there is more certainty/standardisation in recognition of prior learning (RPL) processes.

22. In order to be of greatest value, particularly in terms of focusing on and responding to emerging and rapidly evolving skills needs (which is especially relevant for the care and support economy), it will be important for the NST and Jobs and Skills Australia to understand and reflect the whole journey of careers and qualifications – from on the job training and volunteer experiences through to vocational education and training, undergraduate, and postgraduate degrees and on to continuing education and training. There must be clear and flexible entry and exit points to ensure and support people to exit and re-enter training depending on their needs and preferences.
23. The discussion paper explains that one expected benefit of the NST would be to inform and assist individuals considering a career change better understand how their skills compare to those required by a target career, what specific skills they might need, and how they could acquire or improve them through education. Here, it will be important both for the NST to remain up to date and responsive to a variety of shifting and evolving factors and rely on contemporary (or even predicted) workforce data that is able to identify and convey current and future workforce and skills needs. Importantly, the NST will need to be able to be flexible and cover skills, jobs, and ways of acquiring skills far in advance (e.g., five to ten years) to be truly useful in establishing where future workforce needs and gaps will need to be filled and what future skills must be developed in the lead up. Again, this is where the NST might need to consider an expanded scope that covers younger school aged people who might already be learning in the VET sector or planning and preparing for a job or future career.
24. The NST could add value for skills training which is performed by a variety of roles and professions, e.g., phlebotomy and venipuncture. This skill is performed by people with a variety of education levels, including Cert III in Pathology Collection, bachelor's degrees and specialist medical and nursing qualifications. Generally, practical competency demonstration is required in the clinical environment/workplace following theoretical education. Here, education providers may be able to



reap efficiencies through high quality and accredited cross-course curriculums and employers may be able to achieve benefits by employing the appropriate level of staff required to meet each skill.

25. In relation to where the proposed NST could add value in education, the ANMF highlights that to be effective, educators in all universities, the vocational education and training (VET) sector, and private Registered Training Organisations (RTOs) must be appropriately supported to understand and work with the new taxonomy of the NST. Many educators are already struggling with insecure and part-time employment that does not allow them enough time to provide pastoral care and career advice to students. It is important to recognise that the education sectors have been suffering with reform fatigue for some years now, particularly the VET sector. The current Government has initiated numerous inquiries including the universities accord, the national skills passport, qualification design and reform, migration policy for skills, scope of practice review, understanding the role of the newly implemented JSA and JSC's and the AQF skills classification. As previously stated, many educators are working part-time, not supported to provide pastoral care, or paid to mark assessments or prepare curricula out of designated work hours. To come to terms with all the new innovations they require support and guidance.

2.2 What are the potential unintended consequences or challenges of an NST that will need to be overcome?

26. The discussion paper provides several well-articulated potential unintended consequences or challenges of an NST that the ANMF agrees will need to be overcome. Table 3 on page 13 outlines the potential tensions, which if realised could result in unintended consequences including: i) departure from established industry/education/ professional/ legislative standards, ii) potential negative changes to existing skills development methods, iii) increases in 'skill sets' rather than full and unique industry required qualifications, iv) unintended and potentially detrimental changes to wage skill groupings, v) education delivery issues including changes to the necessary teacher expertise and any associated clinical experiences necessary to show course/study advancement and competency articulation.

27. Establishing a functional NST that demonstrates a practical ability to deliver information in a manner that is consistent with current systems is a momentous task. The implementation and transition to



such a system must be completed in such a manner as to ensure the safeguards offered by current classification systems are maintained.

28. The NST proposed is necessarily broad and intended to cover the breadth of occupations with several potential benefits as well as a range of risks and challenges. The health, maternity, disability, and aged care space (and associated sectors/fields) is highly complex and demands a range of advanced and varied skills, knowledge, and education from those working there. The NST has the potential to create risks of unwarranted and unsafe role substitution and skills dilution for many professions that may result in a decreased level of service provision, create opportunities for the dis-regulation of services and reduce the safety of service provision for consumers. This could create uncertainty for consumers by providing an environment for duplicated or inconsistent service provision with varying standards which may result in greater market manipulation. This may occur because of taking a task-based view that leads to the belief the work is easily broken down and 'simple' denying the synergistic effects of a holistic approach.
29. Medication administration is an example of this where many aged care providers expect care workers to administer medication to residents. Aged care workers do not have the extensive education and ongoing training in medication management undertaken at tertiary level by RNs. Such providers fail to understand the complexity and process of administration and the way it is one small task embedded within a complex process of physiological and mental health assessment, monitoring and evaluation of the person to whom the medication is being administered. Administration also requires knowledge and education about human physiology and mental capacity, pharmacology, and pharmacokinetics to determine if the medication should be administered or withheld as well as the skills necessary to assess for medication efficacy and identify adverse reactions and subsequent actions. This must also be considered in the broader experience of the person and their context.
30. While taxonomies which include skills held by healthcare professionals and workers do exist, providing care to patients and clients is complex and multifaceted. The ANMF considers it to be much more challenging and fraught with potential risk to attempt to distil the work of a nurse or midwife into a range of quantifiable and measurable skills. The ANMF is concerned that an NST might undermine scope of practice developments for healthcare professionals including nurses and midwives and (currently) unregulated/unregistered personal care workers by unintentionally



promoting and perpetuating the notion that complex healthcare interventions are able to be simplified and broken down into separate and easily demarcated tasks/skills.

31. For example, the assessment of patients'/clients' healthcare needs and risk factors is complex and underpinned by considerable knowledge and skills. While undertaking assessments can be learned (i.e., compelling a falls or delirium assessment using a validated instrument or tool), there are many elements of undertaking these assessments (e.g., identifying when to undertake an assessment, understanding and responding to patient needs/preferences, providing individualised and person-centred care based on familiarity and continuity of care, knowing what to do with the results of an assessment etc.) that might not be well captured by aligning the task solely with a skill or skills.
32. Likewise, viewing healthcare activities through the lens of a set of skills/tasks risks overlooking other important factors such as the time component (i.e., how long an activity takes). An example of a potential risk here is that employers could generate a profile of the skills required by healthcare staff in a local workforce (e.g., a nursing home) based on the activities required to provide care to residents with little to no consideration of how much time it should take to undertake those activities to deliver best-practice care that supports high quality health and wellbeing outcomes, individualised and person-centred care, shared-decision making, dignified care experiences, and workplace safety and wellbeing for staff. This might result in a situation where the skills mix and staffing profile of a nursing home is developed to simply 'tick boxes' in terms of the range of skills that have been identified as necessary without sufficient consideration of how many staff members would need to have these skills and how much time is needed to appropriately put those skills into practice to underpin safe, high-quality care. In this way, an NST might lead to potential risks in terms of healthcare quality and safety.
33. Another unintended consequence or challenge that could arise in relation to developing and maintaining a fit for purpose NST could be how well (or even if) such a taxonomy is able to account for or incorporate differences in terms of individual and cultural/social understandings, expressions, and meanings as they relate to skills and/or activities undertaken as part of a work role. For example, providing culturally appropriate and inclusive care for diverse patient groups and individuals is vital to safe, effective, and appropriate healthcare delivery. Here, a workers' own cultural, personal, and



social background might give them important insights and understandings and is influential in shaping and guiding their work.

34. It is difficult to conceive of how an NST will account for cultural knowledge and understanding in a way that makes sense to and is sensitive to diverse populations where much knowledge is developed and acted on through both experience and often unconsciously. How will an NST account for, include, or engage with important issues such as Aboriginal and Torres Strait Islander/First Nations Peoples' knowledge and insight and how this relates to healthcare and beyond? Likewise, incorporating and accounting for wider cultural and linguistic diversity and the ways in which culture and society shape knowledge, skills, learning, and behaviour will also be challenging.
35. Consider for example, how an NST would engage with the skills, knowledge, insight, experience, and understandings needed to provide culturally sensitive, inclusive, and appropriate healthcare to recent migrants or refugees from vulnerable backgrounds who do not speak English and have limited health literacy and little experience or trust in the Australian healthcare system and institutions. Further, how an NST would account for and incorporate people with disabilities, people from varied vulnerable backgrounds, and people who are neurodivergent is unclear and would need considerably more thought and planning. A fit for purpose NST would be comprehensive and inclusive and ensure that the skills of all can be captured and fit within the NST while responsive to changes.
36. Another issue the ANMF considers important is that intersections with other reforms such as the anticipated registration and regulation of care workers in aged care must be thoroughly investigated and acknowledged. Here, it will be vital that an NST incorporates consideration of mobility, articulation, and interfaces between a currently unregulated workforce to a future where such roles will likely be overseen by a regulatory body in the same way health professionals are currently regulated.
37. This transition and these systems will need to be effectively and efficiently integrated. This is particularly important as there is currently no mandatory, uniform qualification or skill set and no shared professional identity or body of knowledge for unregulated occupations such as personal care workers/assistants in nursing. There are also issues with the ways that various systems connect (or



rather do not connect) with one another, for example migration and workforce planning, and labour market testing which will all need considerable attention and consideration.

38. One risk identified by the ANMF is that presented by micro-credentialling, particularly in the health and associated sectors. This form of skills recognition would be expensive, difficult to regulate, difficult to sustain, challenging in terms of consistency, and risk safety across trades and professions. Credentialling can be taken advantage of by unscrupulous education and training providers and employers and frequently increases personal expense for workers. This is particularly challenging in terms of equity of access, where individuals and groups with greater economic resources can pay for and gain greater skills and credentials (and therefore more high-paying jobs) in comparison to more vulnerable and less well-off groups which perpetuates and increases divides between those with more and fewer resources and educational opportunities. This also has gender implications as women – particularly those from vulnerable and low socioeconomic backgrounds - are likely to have less access to education, qualifications, and credentials and would add to existing gender pay, superannuation, and retirement savings gaps.
39. The ANMF advocates for care worker registration and an accreditation scheme with clear links between minimum mandatory qualifications, ongoing training and the wage and career structures as set out in the relevant industrial instrument. Credentialling undermines this type of positive workforce reform and will inhibit pathways between VET and tertiary education as well as career pathways. There is a risk that credentialling will stifle creativity and innovation especially if the United States' approach is adopted where criteria is put forward. While this may be developed as a guide – the risk is that those administering or using the NST see it as an absolute and do not push the boundaries resulting in another bureaucracy/administrative roadblock. This is seen in some areas of accreditation where providers see the guidance as an absolute or prescriptive approach rather than a 'guide'. In these situations, creativity and innovation is shut down. Here, there is a significant opportunity to better integrate VET and tertiary education which will be particularly important in terms of the wider care and support economy.
40. Implementing an NST can bring numerous benefits, but it also presents potential unintended consequences and challenges that need to be addressed. One key consideration is finding a balance between over-simplification and excessive complexity, ensuring the taxonomy is detailed enough to



capture essential skills while remaining user-friendly, and regularly reviewing it to address complexity issues. Potential bias and equity issues, such as underrepresenting certain skills or demographics, require thorough reviews for inclusivity and fairness, engaging diverse stakeholders to identify and address potential biases.

2.3 What do you believe should be the overarching vision for the NST?

41. The ANMF notes that the discussion paper suggest that ‘skills development’ is the background of the economy, however this might be better replaced with a broader and less reductionist perspective that it is healthy, well-supported, educated, and skilled workers with access to high-quality and equitable education and life-long learning that forms the backbone of the economy. Further, the focus on ‘productivity’ might be conceived of as too narrow and that a wellbeing focused economy that supports and enables the community’s health and wellbeing (including that of workers) might not solely be focused on driving productivity improvements and that this may come at a cost to people’s health and wellbeing.
42. In addition to those listed on page 12 and 13 of the discussion paper, other recommended inclusions should be practicality, efficiency, standards, regulation, governance, quality, and safety. Importantly, the overarching vision of the NST should be to improve the current system, reduce duplication and waste, and to be as simple and practical as possible.
43. A proposed vision for the NST could be to create a dynamic, comprehensive, and universally applicable framework that clearly defines and categorises skills, competencies, and qualifications and facilitates the development of a skilled workforce, enhances professional standards, and supports lifelong learning and career progression. This vision includes several key elements:
 - i. A dynamic and evolving framework that adapts to changes in industry practices, technological advancements, and emerging skill requirements, ensuring continuous workforce development.
 - ii. A comprehensive and inclusive taxonomy covering the full spectrum of skills across various professions, including emerging and specialised fields.
 - iii. Universal applicability across different sectors and regions, allowing for consistency and standardisation while accommodating local and sector-specific needs; clear definition and



categorisation of skills, competencies, and qualifications to facilitate understanding, assessment, and application.

- iv. Support for workforce development by identifying skill gaps, informing training and educational programs and pathways, and guiding flexible and evolving career development.
- v. Enhancement of professional standards to elevate the quality and consistency of professional practice across industries and regions.
- vi. Facilitation of lifelong learning to encourage continuous skill acquisition and adaptation throughout an individual's career.
- vii. Integration with existing educational, certification, and regulatory frameworks to ensure seamless application and recognition of skills.

2.4 What guiding principles should underpin the taxonomy? Are there any non-negotiables?

- 44. The ANMF is supportive of the proposed guiding principles, however, highlights that safety for both workers and consumers must be the foremost and a non-negotiable principle that underpins the taxonomy. Likewise, the principle of 'usefulness' or 'utility' must underpin the taxonomy otherwise the NST will be of little purpose and value.
- 45. Guiding principles must also include preparing and supporting the workforce that will underpin the taxonomy; this includes educators at all levels, stakeholders and regulators. Unions must be involved in every level of consultation; decision making and roll out of the NST. Non-negotiables for the ANMF include not undermining the scope of practice of healthcare professionals, such as nurses, not reducing the skills and knowledge of said professionals by denoting them to a set of tasks. Nor will we accept employers, particularly in the aged care sector where nurses work, to diminish the skills, knowledge, and experience of the staff in their employ. Rather we encourage them to embrace their workforce and treat them as valuable resources for their businesses. This includes supporting them to continue learning through continued professional development opportunities at their expense, and to encourage career progression and that be a part of their business plan.
- 46. The ANMF is also concerned about how the NST may affect the National Training system, which is currently undergoing numerous reforms. While these reforms are welcome, there is so much activity



in this space which can be confusing for all, not only for those already in the education system but those who will enter it such as new students.

47. The taxonomy must accurately reflect the skills and competencies required in nursing and midwifery, grounded in real-world practices to meet the actual needs of professionals.
- Clear and precise definitions are essential to avoid ambiguity and ensure consistent application.
 - Usability is critical, with an intuitive structure for easy navigation by practitioners, educators, and employers.
 - Flexibility and adaptability are vital for accommodating changes in skills, technologies, and practices over time, maintaining the taxonomy's relevance.
 - Consistency with other national and international frameworks ensures alignment and facilitates integration with existing systems.
 - Comprehensiveness is necessary to cover the full spectrum of required skills, including emerging areas and specialties.
 - Scalability allows the taxonomy to grow and adapt as the field evolves.
 - Alignment with educational and professional standards supports curriculum development, certification, and ongoing professional development.
 - Engaging a broad range of stakeholders, including professionals, educators, and industry representatives, ensures the taxonomy meets the needs and expectations of users.
 - Transparency and accountability in the development and maintenance process build trust and provide clear documentation and rationale for decisions.
48. These non-negotiable principles ensure the NST would be effective, practical, and aligned with the needs of the nursing and midwifery industries in Australia while accommodating future developments and changes. Considering the above in relation to extensive and robust engagement with all stakeholders, the NST cannot be rushed and must be clearly defined and designed in a time



frame that allows for all stakeholders to have their say.

2.5 How should principles be prioritised if trade-offs are required?

49. Principles must be prioritised in terms of learners within the education system and workers. Addressing their needs is paramount to ensuring the success of the NST and to improving the economy by ensuring those undertaking study of any kind can be employed at the end of their program and provide a valuable contribution to the Australian workforce and economy throughout their careers. The ANMF is concerned that considering ‘trade-offs’ in terms of the guiding principles of a proposed NST at this early planning stage suggests the potential for risk and dilution of the role and function of the NST.

3. Building a National Skills Taxonomy – Design Considerations

3.1 What should an NST look like? Considerations include:

Definitions and nomenclature

50. Clear Terminology: Use precise and universally understood terms for skills, competencies, and roles. Define all key terms for example related to nursing and midwifery to avoid ambiguity.
51. Consistent Language: Ensure consistency in language and definitions across the taxonomy to facilitate understanding and use by practitioners, educators, and employers as well as alignment across other taxonomies and frameworks.

Structure (hierarchy, skill groupings and typologies)

52. Hierarchical Structure: Organise the taxonomy in a hierarchical format, starting with broad categories (e.g., Clinical Skills, Patient Care, Professional Practice) and breaking them down into more specific subcategories (e.g., Medication Administration, Wound Care). Here, it will be important to consider how harder to define and categorise skills such as critical thinking, analytics, and transferability of these would fit in.
53. Skill Groupings: Group related skills into clusters or domains to reflect their interrelationships and facilitate easier navigation.



54. **Typologies:** Use typologies to classify skills by their nature and application, such as technical skills, interpersonal skills, and managerial skills. Levels of learning (E.g., technical to high-level thinking skills) could also be reflected. Here, it will be important to ensure that interdependence between skills and groups of skills be captured to avoid oversimplification.

Granularity

55. **Detailed Descriptions:** Provide detailed descriptions of each skill, including specific tasks, knowledge requirements, and practical applications. This will be challenging however, as over-detailed descriptions could become restrictive particularly for complex skills that are difficult to measure or conceptualise (E.g., cultural sensitivity).

56. **Scalability:** Ensure the taxonomy can capture the full spectrum of nursing and midwifery skills but also scalable to accommodate changes in practice and emerging skills.

Information attached to each skill

57. **Skill Description:** Include a comprehensive description of each skill and where possible outline its purpose, context of use, and importance.

58. **Competency Levels:** Define the different levels of proficiency required for each skill, ranging from basic to advanced.

59. **Assessment Criteria:** Where possible, attach criteria, methods, or benchmarks for assessing proficiency in each skill.

60. **Examples and Resources:** Provide examples or case studies of how each skill is applied in practice and link to relevant resources, guidelines, or training materials.

Proficiency and levelling

61. **Proficiency Levels:** Develop a system for categorising skills by proficiency levels (e.g., beginner, intermediate, advanced) to help in identifying the developmental needs of practitioners.

62. **Competency Frameworks:** Align proficiency levels with established competency frameworks in nursing and midwifery, such as those used for qualifications.



63. Progression Pathways: Outline clear pathways for skill development and progression, helping practitioners to plan their career development and training.

Alignment to other taxonomies

64. Integration with Existing Frameworks: Ensure the NST aligns with other relevant national and international taxonomies and frameworks, such as those from nursing and midwifery bodies, to facilitate integration and consistency.

65. Cross-Referencing: Provide cross-references to related taxonomies and standards to support interoperability and comprehensive skill assessment.

Additional Considerations for Nursing and Midwifery Context

66. Clinical Relevance: Ensure that the taxonomy reflects the specific clinical competencies and practice areas relevant to nursing and midwifery, including emerging fields such as telehealth and advanced practice roles.

67. Professional Development: Design the taxonomy to support ongoing professional development and lifelong learning, incorporating requirements for continuing education and skills updates.

68. Regulatory and Accreditation Standards: Align the taxonomy with regulatory and accreditation standards to ensure it supports licensure and certification processes.

69. By addressing these considerations above, the NST can be better designed to effectively support nursing and midwifery professionals, providing a structured and comprehensive framework for skill development, assessment, and alignment with industry standards.

70. While many jobs and sectors are similarly complex and demand a vast array of skills, healthcare, as noted above, is highly complex, multifaceted, and arguably less amenable to being understood solely through the lens of the range of skills that workers can or do possess. As peoples' health and wellbeing is the central focus of healthcare delivery, if a NST is to be developed that covers any and all industries and sectors, special focus must be given to ensuring that an NST in healthcare is fit for purpose and does not result in detrimental or negative outcomes that might lead to poorer health outcomes for patients/clients or risks to the health, safety, and wellbeing of staff.



71. As developing a working and effective NST is clearly a massive undertaking with a variety of both general/broad and very specific considerations, it might be advisable to focus in on health (and associated sectors) to ensure that an NST for this sector does not result in negative outcomes for stakeholders. Here, it will be vital that the various and complex skills required in healthcare are understood clearly. This is likely to require in-depth and specialised clinical knowledge, expertise, and insight across a vast range of healthcare specialisations. Another risk here, is that healthcare is highly individualised and necessarily person-centred and must account for an increasingly diverse population of patients, clients, and community members. How a NST will be able to account for the considerable and important diversity present in the healthcare system both in terms of healthcare interventions and activities as well as the diversity of staff/workers and patients/clients is unclear.

3.2 Are there any additional features or key considerations for an effective design of the NST to support its use?

Considerations could include supporting materials, usage guidelines or technological solutions that will enable or better facilitate NST usage.

72. Considerations around what supporting materials might be necessary could include clear, concise, and understandable skills descriptions, interactive mapping tools, and case studies for users with a range of perspectives. Usage guidelines must be clear and comprehensive and include detailed (but concise) information explaining the structure of the NST, how it can be navigated, and how users from a range of areas/perspectives can utilise it for different purposes. Training programs might also be offered online. Technological/technical solutions to be considered could include search functionality, interoperability capability with varied systems, and powerful and interactive data visualisation tools. Ensuring streamlined and efficient updates and corresponding guidance and support for users will also be necessary along with considerations for version control and ongoing evolution, adaptation and evaluation of the NST. Further, the NST must be supported by sufficient and sustainable funding and resources to implement, maintain, and support the taxonomy, as well as from an evaluation perspective.

73. To ensure the NST is effective and appropriate for nursing and midwifery, it should include several key considerations. Specialised content is crucial, with domain-specific categories that cover skills such as patient assessment, clinical procedures, emergency response, and patient education, while



aligning with existing competency frameworks. Supporting materials like links to clinical guidelines and practical case studies will aid in understanding and applying skills in real-world contexts. Usage guidelines should facilitate integration with accreditation processes and curriculum development, ensuring the taxonomy supports educational programs effectively. Technological solutions, such as integration with simulation tools and Clinical Decision Support Systems (CDSS), are essential for enhancing skill development and evidence-based practice. Feedback mechanisms must involve input from professionals to refine the taxonomy based on real-world experiences, with updates aligned with continuing education requirements. Data analytics will be used to identify skill gaps and measure the taxonomy's impact on patient care and professional development.

74. Accessibility and inclusivity are also important, ensuring resources are available to all professionals, including those in underserved areas, and incorporating cultural safety and competence. Security and privacy measures should protect patient and professional data. The taxonomy should be scalable and adaptable to changes in practice and regional needs. Finally, stakeholder collaboration with industrial and professional associations, and educational institutions will ensure alignment with standards and effective integration into curricula. These considerations will help tailor the NST to meet the specific needs of nursing and midwifery, supporting relevant skill development and competency recognition in these vital fields.

4. Building a National Skills Taxonomy – Implementation

Considerations

4.1 What are the most appropriate ongoing governance arrangements for the NST and why?

75. Strong, transparent, and well planned and coordinated governance arrangements will be fundamental to the operation of a proposed NST in order to establish and maintain sustainability, adaptability, and credibility as well as the level of multi-sector collaboration and engagement required. This might necessitate ministerial oversight and backing which would also help to align the NST to relevant policy priorities such as establishing and sustaining the health and care economy. Governance of the proposed NST should be overseen by a national independent, multi-stakeholder committee with genuine representation from a range of key stakeholder groups including



government agencies and departments, industry/employer representatives, education and training providers, and professional associations and unions.

76. Multi-stakeholder oversight would offer benefits in terms of balance, comprehensiveness, and consideration of multiple perspectives and views, broad industry-relevance and educational alignment ensuring the taxonomy remains aligned with current and future industry requirements. This includes ensuring the practical and research expertise of education providers (i.e., universities) can be utilised effectively, as well as supporting broader adoption through diverse stakeholder inclusion. The multi-stakeholder committee would be responsible for providing and governing the level of oversight, review and update, dispute resolution (e.g., through the appointment of an independent chair), and stakeholder engagement functions necessary to underpin a fit for purpose NST.
77. Quality assurance should be maintained through the development of standards, regular audits, and compliance reviews. Integration with other national and international frameworks, supported by advanced technologies, will promote coherence and interoperability. Securing ongoing funding and resource allocation is critical for supporting governance activities and updates. These considerations will ensure the NST remains relevant, effective, and responsive to the evolving needs of the labour market and educational institutions.

4.2 How should the NST be updated and maintained? Considerations include:

How skills are identified for inclusion, including initial identification and validation

78. To identify skills for inclusion in the NST it will be essential to establish a solid foundation with clear definitions and descriptions and identifying the audience to which an NST is aimed. Initial identification should involve reviewing both international standards and existing frameworks within Australia to ensure the taxonomy reflects global and local practices. Each skill must be thoroughly described, including its application and context. Additionally, it is important to organise skills within a hierarchical structure (where possible) that reflects the varying levels of complexity and usage, ensuring a comprehensive and practical representation of skill requirements without being overly prescriptive.
79. Consulting with key stakeholders, including professional associations, unions, and educational



providers, is fundamental to the inclusion process of skills in relation to specific professions. Engaging these groups ensures that the taxonomy accurately reflects industry needs, practices, and educational requirements, thereby enhancing its relevance and effectiveness.

The rate at which update should occur

80. A taxonomy should be updated regularly to remain relevant and effective. Generally, updates should occur depending on the pace of change in industry. In healthcare this might be more frequent than other sectors. This frequency allows the taxonomy to incorporate emerging skills, technological advancements, and shifts in industry standards while maintaining its usefulness and accuracy. However, more frequent updates may be necessary in rapidly evolving sectors, while less frequent updates might be sufficient in more stable fields. Regular reviews and stakeholder consultations can help determine the appropriate update schedule.

The development of data quality standards or a data quality framework

81. The ANMF highlights that it will be likely (and more effective) if a combination of approaches, both data-driven and consultative, is used to identify and validate skills for inclusion. This will be particularly essential for identifying and incorporating newly identified skills or skills that are likely to be necessary for emerging and future jobs and roles. In order to be useful, the NST will need to be regularly updated or it will fall into disuse, and it will not be fit for purpose. Likewise, the development and maintenance of rigorous data quality standards and a strong data quality framework is essential. The ANMF understands that the use of data is critical to inform policies that boost workforce participation and equity. Analysis of high-quality, rigorously collected, robust and reliable data will help improve workforce participation outcomes for First Nations people, people with disability, women, older workers, and other vulnerable groups.

4.3 Which storage or dissemination methods / infrastructure would be most valuable for enabling effective use of the NST?

82. As explained in the discussion paper, there is a range of storage and dissemination methods and infrastructure considerations that can be assessed for enabling effective use of the proposed NST. Considerations regarding storage and dissemination methods should cover broad accessibility and clarity, integration and interoperability with current and future resources, the need for regular



updates inline with a rapidly changing skills landscape, and sufficient usability/user-friendliness for the variety of stakeholders/users who navigate the NST.

83. Potential methods for storage and dissemination that should be considered include hosting the NST on a dedicated section of a relevant Government website (e.g., Jobs and Skills Australia) that would encourage easy access and government oversight, utilising an open-source platform to promote wider adoption and community buy-in, or even a mobile application.
84. Additional considerations regarding storage might include ensuring standardised data formats for integration with a wider range of systems and tools and supporting easy user access, as well as Application Programming Interfaces (APIs) to allow developers to create applications that leverage data in the NST.
85. To ensure the effective use of an NST selecting the right storage and dissemination methods is essential. Centralised database systems, such as relational databases and data warehouses, provide robust solutions for managing and analysing structured data. Cloud-based storage offers scalability and flexibility, with backup and recovery options to safeguard data. Data lakes are ideal for handling unstructured and semi-structured data, while content management systems help organise and share related resources.
86. For dissemination, web portals and interactive dashboards offer user-friendly access, with real-time updates and search functionalities. APIs facilitate data integration with other systems, enhancing interoperability. Mobile applications improve accessibility, allowing users to engage with the NST on-the-go. Public reports and policy briefs keep stakeholders informed, while training sessions and workshops provide guidance on using the taxonomy effectively. Data visualisation tools make complex information more understandable, and feedback mechanisms ensure continuous improvement. By employing these strategies, the NST can be a valuable, accessible resource for various users, including policymakers, educators, and employers.