



Government  
of South Australia

Hon David Pisoni MP  
Member for Unley

20IS/00734

Hon Clare Scriven MLC  
Legislative Council  
Parliament House  
ADELAIDE SA 5000

Email: [scriven.office@parliament.sa.gov.au](mailto:scriven.office@parliament.sa.gov.au)

Dear Ms Scriven

**APPLICATION UNDER THE *FREEDOM OF INFORMATION ACT 1991***

I refer to your application made under the *Freedom of Information Act 1991* (FOI Act) on 1 June 2020 seeking access to:

*"All correspondence between Minister David Pisoni and Equal Opportunity Commissioner Dr Niki Vincent since April, 1 2018."*

A search for documents held by the Minister for Innovation and Skills was undertaken for the period 1 April 2018 to 1 June 2020 and two documents were identified within scope of your application. A detailed document schedule is attached for your reference.

I have determined to release both documents to you in full.

No fees and charges are payable for this application.

Yours sincerely

Franca Bergamaschi  
**Accredited FOI Officer**

27 / 7 / 2020

Minister for Innovation and Skills

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FREEDOM OF INFORMATION

DOCUMENT SCHEDULE

Agency: Office of the Hon David Pisoni MP, Minister for Innovation and Skills

Agency Ref: 20IS/00734

Title: "All correspondence between Minister David Pisoni and Equal Opportunity Commissioner Dr Niki Vincent since April 1, 2018."

Date: From 1/04/2018 to 1/06/2020.

Doc No	Brief Description	Date of Document	Released (Full/Part/Refused)	Exemption Clauses
1	Letter from the Commissioner for Equal Opportunity to the Minister for Innovation and Skills	19/08/2019	Full	n/a
2	Letter from the Minister for Innovation and Skills to the Commissioner for Equal Opportunity	03/10/2019	Full	n/a



1915/00974

19 August 2019



**Government of South Australia**  
Office of the Commissioner for  
Equal Opportunity

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Minister for Innovation and Skills  
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Dear Minister Pisoni,

**Re: Alignment of the Department of Innovation and Skills – Skilling South Australia  
and pathways to employment for mature age jobseekers**

As South Australia's Commissioner for Equal Opportunity, I administer the South Australian *Equal Opportunity Act 1984* (the Act). The Act prohibits discrimination on a number of grounds, including sex and caring responsibilities, in a range of public areas including in employment. My key responsibilities are to examine and respond to complaints of discrimination, promote equality of opportunity, and foster informed and unprejudiced community attitudes, with a view to eliminating discrimination on the grounds to which the Act applies.

I recently received correspondence from DOME, an organisation who have for the past 37 years assisted mature age jobseekers to gain employment in SA. In their correspondence DOME raised a number of concerns with me regarding the negative impact on mature age jobseekers of the Department of Innovation and Skills (DIS) - Skilling SA program.

In particular the decision to reduce DOME's funding in 2019 – 20 through the 'Workforce Development Project' and uncertainty about the future of this funding, as I understand it has been critical to their work in assisting unemployed mature age job seekers to access training opportunities and employment in South Australia.

Additionally the DIS's decision to no longer subsidise a number of VET qualifications i.e. a Certificate III in Business Administration except where there is a contract of training for an apprenticeship or traineeship.

While I realise the importance of this program in delivering and supporting the SA government's focus on creating apprenticeships and traineeships to fill skills gaps and reduce youth unemployment, the program in its current form does not appear to provide appropriate and sustainable pathways to employment for mature age jobseekers.

Another potential barrier to mature age jobseekers accessing the program are the images and language used to promote the Skilling SA program on the Skilling SA website along with the marketing campaign. The website and the marketing campaign primarily focuses on students, parents and under 25's and in my view are not inclusive of mature age jobseekers.

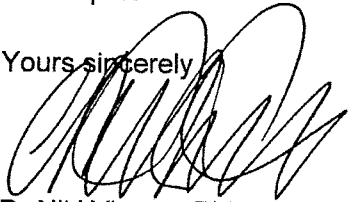
DOME have identified a number of specific barriers to mature age job seekers obtaining traineeships or apprenticeships as a pathway to employment in their report entitled 'Support for mature age jobseekers - November 2018'.<sup>i</sup> I have attached a copy for your reference.

I understand that representatives from DOME have previously met with staff from DIS and DIS has been provided with a copy of the above report, however at this stage they have not received a formal response from DIS.

As Commissioner for Equal Opportunity in SA, I remain concerned about age discrimination remaining a barrier to mature age jobseekers gaining employment and contributing to the South Australian economy. Noting that age discrimination in employment was the third most common complaint accepted by the Equal Opportunity Commission in the 2017/18 financial year.<sup>ii</sup>

I would therefore ask for your support in ensuring that DIS provide a formal response to DOME's report and where possible consider addressing the concerns they have raised in their report.

Yours sincerely



Dr Niki Vincent PhD  
Commissioner for Equal Opportunity

Cc: Johanna Milbank. DOME Association Inc.

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<sup>i</sup> Johanna Milbank, Support For Mature Age Jobseekers, DOME Association Inc., (Adelaide South Australia, November 2018) p.3-9

<sup>ii</sup> 2017-18 Annual Report, Equal Opportunity Commission of South Australia, (Adelaide South Australia, September 2018), p.22.  
<https://eoc.sa.gov.au/resources/annual-reports>

Attachments:

1. Johanna Milbank, Support For Mature Age Jobseekers, DOME Association Inc., (Adelaide South Australia, November 2018)



## SUPPORT FOR MATURE AGED JOB SEEKERS

November 2018

### ABSTRACT

DOME has supported mature aged job seekers for over 37 years. Recent changes to policy directions from the State Government for the delivery of Employment and Skills programs have the potential to negatively impact mature aged job seekers. This paper seeks to understand those impacts and to inform future directions for DOME and Government bodies.



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## Summary

DOME Association Inc has played a role in assisting mature aged job seekers gain employment for the past 37 years. With the South Australian Government's change in focus to apprenticeships and traineeships as the sole vehicle for employment support, this puts mature aged job seekers at a disadvantage. As a significant part of the South Australian workforce, many older job seekers do not fit the current focus and will potentially fall through the gaps, leading to increased unemployment for this demographic. This will also have flow on effects into health and well-being.

Dome has surveyed both mature aged job seekers and employers to ascertain their attitudes to apprenticeships and traineeships and mature (40 + years) workers. And while many older workers would like to consider or be considered for apprenticeships and traineeships, they see issues with employers willing to take them on and being able to financially support their families on a lower training wage, their physical capacity, other caring responsibilities and, particularly, the age discrimination they are likely to encounter.

Employers too have expressed similar concerns, with a number saying their work is too physical for older workers particularly in the trades and not being able to commit to ongoing employment following the apprenticeship or traineeship.

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*If I do a training program/apprenticeship, by the time I finish, I will be 63. I would be so close to retirement age, who is going to give me a short-term roll, anyway!*

*DOME Survey Respondent*

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Both groups indicated that it just was not viable to put an older person through an apprenticeship or traineeship when you look at the older aged groups of 55 – 60+ years when retirement was so close. Attitudes were more favourable for those 40 – 54 years of age, with some very willing and wanting to consider this option.

DOME requires the continuation of the funding through the Workforce Development Project that has supported mature age unemployed in South Australia. This will also allow DOME to support the government's election promise to create an additional 20,800 apprenticeships and traineeships over the next 4 years.

With this support DOME can provide specialist support and guidance to the current 2,000 + job seekers over the age of 40 years registered with DOME and the 2,000 + employers who use DOME to find suitable employees. Services needed are support and guidance for:

- employers who may be interested in traineeships and apprenticeships
- mature aged workers and jobseekers towards, and into contracts of training;
- mature age jobseekers who are not receiving Commonwealth job search support
- mature age jobseekers in VET qualification under the Skilling SA Quota program
- mature age jobseekers who (for a number of reasons) are not suitable or eligible for contracts of training or similar activities

If DOME does not receive the funding support, it will close! And South Australia will lose a unique service that has been acknowledged by Minister Pisoni at DOME AGM's as an important service for unemployed mature aged South Australians. The government would also lose the specialised support for a large part of the South Australian Workforce in their drive to achieve the election commitment for Skilling South Australia.

## Introduction

DOMe has been a strong advocator for mature aged job seekers for many years and actively engages in conversations around the needs and supports that mature aged people need to engage and re-engage them in the South Australian workforce across government, community and industry.

As is well known, older job seekers take longer to get back into the workforce often being unemployed for several years with many eventually giving up on the idea of obtaining work. There is strong discrimination towards older workers by employers combined with health and physical limitation, caring responsibilities, digital literacy and other issues.

Over it's lifetime, DOMe has provided a service to mature aged job seekers for the SA Government through their targeted employment and skills funded programs. There is no other service like DOMe's within South Australia that is specific and available to all mature aged job seekers. Many of these people would have access to zero support services to assist them in accessing the workforce without DOMe. DOMe also does not receive any Commonwealth funding for its activities to support the mature age unemployed in South Australian and is grateful for the support provide by the State government over the past 37 years.

## A new focus - Department of Industry and Skills, Skilling South Australia

Skilling South Australia was commenced mid-2018 and will invest \$100 million in creating more than 20,800 new apprenticeships and traineeships that is aimed to assist people build lasting careers and grow the skilled workforce to meet the economic opportunities presented by defence projects and growth in digital technology. Students and career seekers are being encouraged to view VET, apprenticeships and traineeships as a first choice to help them achieve rewarding, well-paid and transferable careers with opportunities for career progression. It also aims to equip young South Australians to seize the opportunities of the future and to thrive in a changing world. But what does this mean for older South Australians?

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*I would really love an apprenticeship. I had no idea they are available.*

*DOMe Survey Respondent*

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## South Australia Labour Force and Unemployment by Age

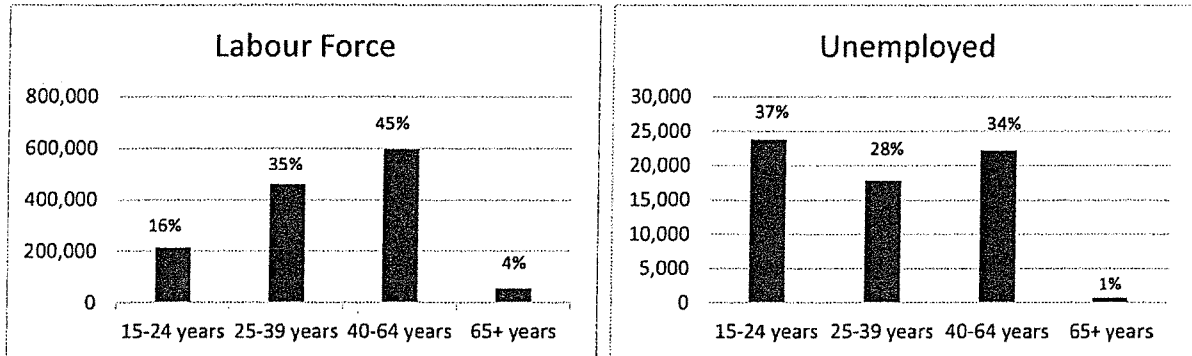
People 40 years and over make up 49% of the labour force and 35% of those unemployed without including the many that are under-employed and needing more hours of work to meet their financial needs.

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*If one person can see that I have the desire to do what younger apprentices do, except with maturity and a desire to be successful, then I believe the prejudice of age would be quickly overcome. Companies want to save money in order to make money. Companies need to understand investment and return, not just the short-term quick fix.*

*DOMe Survey Respondent*

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It makes sense for Skilling SA to target young people, as they represent 37% of the unemployed in South Australia. It needs to be also noted that the mature age (40+) are also a large cohort, 35% of the unemployed, and they too need specialised support and guidance to enter into a contract of training or to find employment.

As a Registered Training Organisation delivering VET qualifications over all age groups, DOMe understands and can assist the mature age unemployed into and through a VET qualification program, be it a straight learning qualification or as an apprentice or trainee.

A well-recognised effect of mature age unemployment is that it also creates long term unemployment (70 weeks +), which is known to also create generational unemployment. With the government's strong focus towards youth and younger workers, they should not neglect the mature age as they can play an important role in determining role models for the young worker.

### DOMe Services

DOMe has linkage to 2,000 employers, mostly SME's who would require support and advice in engaging mature aged workers, understanding transferable skills and how they can be applied in their workplace for potential traineeships and apprenticeships.

DOMe has linkages to 2,000 mature age (40+ years) job seekers who require advice and support in ascertaining the suitability of traineeships and apprenticeships for their situation, background, skills, training, and available job opportunities. Many of these will be unsuitable or ineligible for an apprenticeship or traineeship due to:

- Previous qualifications within an industry making them ineligible for a particular apprenticeship or traineeship;
- The physical nature of many apprenticeships making them unsuitable for older workers
- Requirement for flexible and part-time hours especially for those with health issues or caring responsibilities
- Being close to retirement age making the commencement of a longer-term training course not viable for either the individual or the employer

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*Guarantee of employment and pay for apprenticeships/traineeships are minimal (not worth it) as far as I am concerned. I am already highly qualified and in many occasions over qualified so what is another form of training going to do for me.*

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DOMe Survey Respondent

- A low training wage not being viable for the individual to cover family and household expenses, and while higher wages can be negotiated, many employers would be unwilling to do this and would opt for a younger person that they can pay less
- Discrimination of older workers

Data collected by DOME over many years has shown that around 50% of older jobseekers are not linked to Job Active or Commonwealth service, so without the support of DOME would not receive support to access the employment market.

DOME is investigating how we can support mature aged job seekers into traineeships and are currently working with aged care providers, like Resthaven, on this. Other initiatives that support pathways into apprenticeships and traineeships are also being investigated. This includes developing links with GTOs, delivery of pathway projects and pre-vocational training. However, given the barriers listed above for older workers, DOME still needs to be able to offer support for other options for mature aged jobseekers to get employment who do not fit the apprenticeship/traineeship model. These other supports include career advice and provision of information about areas of employment opportunities, general job matching and placement, literacy (including digital) and numeracy training and using volunteering for skill development, currency of work history and confidence building.

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*Having previously investigated adult apprenticeships, I came to the conclusion that the reduced wages for the training period at 58 years of age did not justify the end qualification, with still no guarantee of a full time position. Particularly with the level of age discrimination that exists from employers in South Australia.*

**DOME Survey Respondent**

*We are not attracted to the mature aged apprentice over the age of 30 (approx) - this is hard manual work and older employees find the work difficult.*

**Employer (DOME survey)**

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DOME is a specialist provider to mature aged job seekers. Without DOME, they would be unlikely to get the right support or advice specific to their particular needs.

As part of the DOME service we would work with 800 or more new jobseekers each year and would typically assist over 300 into employment. This service provides significant savings to Government in unemployment benefits, general contribution to the SA economy and in GST revenue.

To help DOME understand the attitudes of both mature aged job seekers and employers, in October 2018 we surveyed both groups. About half of the 45 businesses averaging 5-19 employees that responded from across a range of industries, 23 currently or had in the past, employed an apprentice or trainee. Eleven of these either had a current apprentice/trainee or had one within the past 12 months, 6 had not had an apprentice or trainee for 2-5 years and 2 for more than 5-years.

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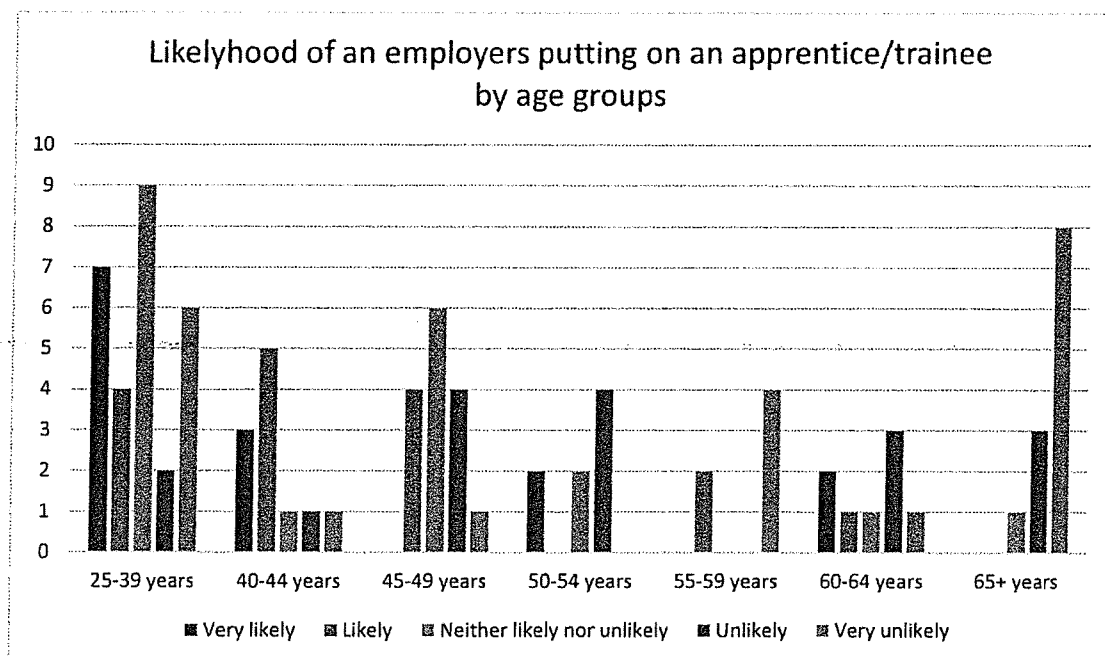
*I would welcome this opportunity to gain a new skill as I am wanting to make a career change myself. Open to any and all work chances.*

*DOME Survey Respondent*

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When employers were asked "what was the likelihood they would employ an apprentice/trainee" across the different age groups, responses indicated that for those aged 25-39 years and 40-44 years the likelihood was favourable. Though there were some that were 'very unlikely' to employ an apprentice or trainee regardless of age. Responses were mixed across the age groups 45-49 years and 50-54 years and

were quite negative for those aged 50-59 years. For the aged group 60-64 years and 65+ years responses were mostly "unlikely" and "very unlikely".



Some of the employers through their responses demonstrated an opinion that older workers were "too set in their ways" therefore difficult to train and as such, would be unwilling to have them as an apprentice or trainee.

Of the 171 individuals over the age of 40 years surveyed, 59% were male, 41% female. Fifty one percent had an education level of Diploma or above, 26% had Certificate levels of II to IV, and 23% had Year 12 or equivalent or less. DOME's data base of job seekers also shows that many also have multiple qualifications across multiple industries. This would make it difficult for many of these to qualify to undertake training through an apprenticeship or traineeship.

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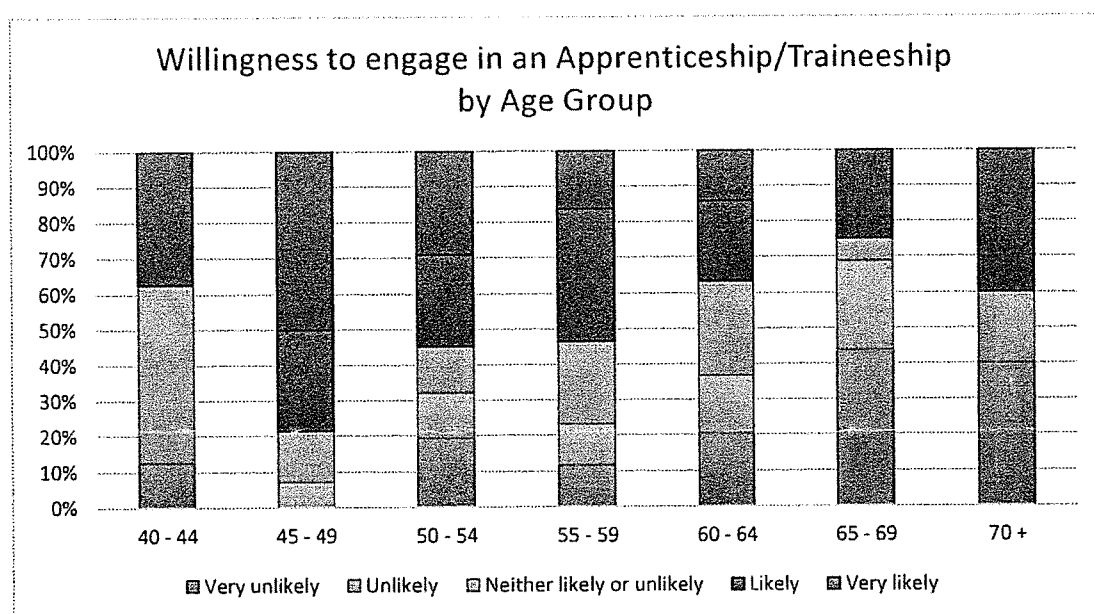
*I've got too many qualifications already: 2 bachelor's degrees, a graduate certificate, and a master's degree. My substantial education tends to put off potential employers as it is.*

*DOME Survey Respondent*

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Many were concerned about prejudice due to their age in being able to obtain an apprenticeship or traineeship, followed by there being no guarantee of ongoing work following the training period and being right back to where they started prior to commencing training but several years older. Many were also quite concerned by not being able to earn enough while training.

When asked about their willingness to undertake an apprenticeship/traineeship, half or less than ½ of 40-49 year olds indicated they would, 70-80% of those aged 50-64 years indicated they were neither likely or unlikely or unlikely / very unlikely, and for those aged over 65, 60-72% were unlikely or very unlikely to undertake an apprenticeship / traineeship.




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*I would rather hire good young kids from good families and start from scratch with them, rather than try and deal with someone that didn't have their act together when they were younger and didn't get a trade back then*

*Employer (DOME Survey)*

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## Conclusions

Mature aged people (40 + years) make up 49% of the workforce and 35% of the un-employed.

DOME has strong connections to the mature aged workforce ensuring the government has a vehicle with which to engage with this cohort

Assisting to engage and maintain mature workers in the workforce ensures we have good role models and mentors for our younger worker and provides a buffer for many families in reducing the likelihood of generational unemployment.

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*For us its about values and fit with the people we support*

*Employer (DOME Survey)*

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DOME has good connections to many employers that value mature aged workers providing examples for other businesses as to the value of older workers and an immediate link to employment opportunities for mature aged job seekers.

Without funding and without DOME, a larger gap would exist for mature aged job seekers increasing the barriers for them to re-engaging with the workforce and links to employers who are receptive to older workers.

There is a miss-match in the current focus of the South Australian Government and their Skilling SA program between apprenticeships / traineeships and mature aged workers. And while some may be suitable and willing, a large cohort would not be and will still require assistance through other mechanisms to gain employment.

Many mature aged job seekers are receptive to apprenticeships and traineeships but recognise how difficult it will be to actually find a fit with an employer willing to take them on under a contract of training.

Mature aged workers are concerned that a training wage would be insufficient to support them and their families and while higher wages can be negotiated there is strong scepticism that many employers would be willing to do this.

Many employers do not see any value in taking on a mature aged worker under a contract of training when they could potentially retire. Many employers cannot guarantee ongoing employment at completion, leaving the mature worker back a square 1 and several years older trying to gain employment.

Many older workers already have qualifications, with some with multiple qualifications over different industries making them ineligible for contracts of training. Being over qualified is another barrier many mature workers face.

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*The qualifications I have is bachelor and higher for electronics, electrical and IT engineering. This is my first career choice. I cannot work with labour work, I cannot lift heavy things!*

*DOME Survey Respondent*

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For some, obtaining qualifications are only one of many barriers that mature aged workers must face in accessing employment. A focus on apprenticeships and traineeships for mature aged



workers does not address the many other barriers they experience including age discrimination. Other supports are needed for this cohort, not only for the opportunities that apprenticeships and traineeships present but also other pathways to employment that might be more suitable for their situation.

DOME strongly advocates for continued funding of general employment support programs for mature aged job seekers, advocacy with employers about the benefits of mature workers and continued work in development of programs in this area that will improve opportunities for mature aged job seekers. Without funding support DOME will be unable to continue this important work.



Government  
of South Australia

Hon David Pisoni MP

Member for Unley

Ref Number 191S/00974

Dr Niki Vincent PhD  
Commissioner for Equal Opportunity  
Office of the Commissioner for Equal Opportunity  
GPO Box 464  
ADELAIDE SA 5001

Dear Dr Vincent *Niki*

Thank you for your recent letter regarding the services provided by Don't Overlook Mature Expertise (DOME) to assist mature-age job seekers to gain employment in South Australia.

The Marshall Liberal Government is growing jobs and building a competitive, dynamic economy for all South Australians. Since the March 2018 election, thousands of jobs have been created, with a record number of South Australians now employed. (ABS labour market data for August shows that since the March 2018 State election there are 14,600 more people employed to reach a record high of 855,400 workers.).

Importantly, we are supporting workers of all ages to access training to gain the skills required to enter the jobs required by industry - vital in a transitioning economy.

In addition to our \$200 million Skilling South Australia program, to create an additional 20,800 apprentices and trainees over four years, we are focussed on supporting existing workers to reskill, including through micro-credentialing qualifications.

Employment Facilitators have been engaged to work with South Australian job seekers, including mature-age job seekers, to connect them with training, employment opportunities and link them with existing Federal programs, for example, the *Skills Checkpoint For Older Workers* and the *Stronger Transitions* programs. The Marshall Liberal Government is working directly with the Federal Government to provide support for workers through tailored career advice, skills and training assistance, health and wellbeing initiatives and jobs search assistance.

Minister for Innovation and Skills

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Government  
of South Australia

The Department for Innovation and Skills (DIS) continues to work with DOME to support mature-age people to find work, and transition into employment opportunities through skills development programs.

I understand that in March DIS invited DOME to submit a 2019-20 Business Case with scaled delivery scenarios, starting at a service purchase value of \$300,000 with a ceiling of \$500,000.

I have been advised DOME will deliver a \$400,000 restructured Workforce Development Project that includes deliverables around its operational sustainability, a review of DOME's extensive employer registration list and facilitating employer workshops to connect job seekers. As a functioning RTO, DOME is also well positioned to earn revenue from training delivery.

In response to your correspondence, I have asked DIS to meet with DOME to discuss its concerns in more detail. In the interim, should you require any further information, please contact Mr Mark Kemperman, Manager Skills Initiatives on 8429-3044.

Yours sincerely

A handwritten signature in black ink, appearing to read "David Pisoni", with a long horizontal flourish extending to the right.

Hon David Pisoni MP  
**Minister for Innovation and Skills**

3/10/2019

