

12 September 2022

Director
Small Business Tax Unit
Treasury
Langton Cres
Parkes ACT 2600
E: SkillsBoost@treasury.gov.au

Dear Director,

RE: Skills and Training Boost Exposure Draft

Thank you for the opportunity to comment on the Skills and Training Boost Exposure Draft.

Royal Life Saving Society - Australia

Royal Life Saving Society – Australia is a nationally federated organisation with a physical presence in every State and Territory. Our member organisations are all Registered Training Organisations. We work extensively with the aquatic industry and community groups to prevent drowning. Critically, drowning prevention relies upon a skilled, motivated and engaged workforce to safely operate aquatic facilities and swim schools and provide water safety skills and training to the Australian community.

Royal Life Saving chairs and is secretariat for the National Aquatic Industry Committee (NAIC) which has the goal of strengthening the health, safety and viability of aquatic facility ownership and operations across Australia. Its members represent all sections of the aquatic industry, encompassing different industry ownership and management models.

The national aquatic industry

Research by Royal Life Saving Society – Australia and PricewaterhouseCoopers has shown that the National Aquatic Industry contributes \$9.1 billion in social, health and economic value to Australians.

The aquatic industry, including swim schools, employs approximately 67,000 frontline workers, almost half of the workforce are casual employees and three-quarters are female, and 40 per cent are between the ages of 18 and 24 years.

At the peak of the COVID-19 pandemic shutdown, Royal Life Saving estimates that there were more than 1,077 aquatic facilities, the majority of which are owned by local councils, and more than 1,176 swim schools, including many small businesses that were required to close.

A significant proportion of staff were forced to seek alternative employment during the pandemic closures and have not returned to industry.

There are significant shortfalls in staff at aquatic facilities and swim schools Australia-wide. While training costs are relatively affordable, for disadvantaged and marginalised people, including those who have disengaged from other forms of education, the costs can be prohibitive.

Aquatic industry facilities want to recruit people to keep these vital community facilities open with a safe level of staffing.

Our response to the Exposure Draft

We welcome the Skills and Training Boost Exposure Draft. This measure will allow aquatic facilities and swim schools across Australia to invest in new employees by providing them industry-approved training courses.

Critically, this measure will assist aquatic facilities and swim schools of all sizes to re-invest in upskilling staff with a mixture of core, transferable life skills (first aid, communication with different audiences) and industry specific instruction (water safety instruction skills) that equip people with nationally recognised qualifications in an industry with significant employment opportunities and the capacity for career growth.

Many aquatic facilities and swim schools are struggling to recover financially from the COVID-19 lockdown periods. For some facilities this measure will be a crucial lifeline to start recovering from financial hardship.

We particularly welcome the extension of the definition of small business for the purposes of this piece of legislation, which allows for the inclusion of aquatic facility operators who provide services in multiple communities. Equally, the definition provides for learn-to-swim operators who have one small location teaching children to swim. We do note that for small businesses such as swim schools, while 20% is a welcome deduction, a higher percentage may further incentivise a higher uptake.

The timeframe 2022-2024 gives the industry a reasonable period to find suitable staff and enrol for training with a Registered Training Organisation. It recognises that the key period for financial recovery of these businesses is in the immediate term. We also welcome the retrospectivity aspect, dating back to 29 March 2022 in recognition of all those operators who have already chosen to invest in training for their staff.

While there remain a number of challenges for the aquatic industry, this Exposure Draft will be of significant assistance to a broad spectrum of providers across the aquatic industry.

Yours sincerely,



Justin Scarr
Chief Executive Officer
Royal Life Saving Society – Australia