

HumanAbility Submission

Consultation: Updating ANZSCO: Reflecting a modern Australian Labour Market

September 2024



HumanAbility is a Jobs and Skills Council funded by the Australian Government Department of Employment and Workplace Relations.



Acknowledgement of Country

HumanAbility acknowledges the Aboriginal and Torres Strait Islander peoples as the Traditional Custodians of the lands on which we work and live and recognise and their continuing connection to both their lands and seas.

We pay our respects to Elders past and present.

About HumanAbility

HumanAbility is the Jobs and Skills Council for the Care Economy. One of 10 Jobs and Skills Councils established in 2023, our role is to provide leadership to address skills and workforce challenges for our industries, with a focus on the Vocational Education and Training (VET) qualified workforce.

We are responsible for ensuring the aged care, disability, children's education and care, health, human (community) services and sport and recreation sectors are supported with skilled, adaptable and sustainable workforces to achieve positive economic and social outcomes for industry, community and individuals.

Human Ability's four key functions are:

- Workforce planning
- Training Product development
- Implementation, promotion and monitoring
- Industry stewardship

We are tripartite. Our governance structure and stakeholder engagement approach reflect government, union and industry.

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Executive Summary

HumanAbility is the Jobs and Skills Council for the Care and Support Economy. Our remit covers aged care, disability support, early children's education and care, health, human (community) services and sport and recreation. We have a specific focus on addressing skills and workforce challenges in the Vocational Education and Training (VET) qualified parts of the workforce.

We welcome the Australian Bureau of Statistics ANZSCO Comprehensive Review and are optimistic the proposed changes will be of significant benefit to the care and support sectors and roles within them as it continues to grow and evolve over the coming decades.

As a Jobs and Skills Council, HumanAbility uses all levels of the ANZSCO classification hierarchy. This is to understand sector workforces within our remit which include the Aged Care and Disability, Early Children's Education and Care, Health, Human (Community Services) and Sport and Recreation and as a whole care and support sector. This informs the understanding of the workforce, including demographics, distribution and the education, skills and training options of the current and future workforce. It also informs the advice we provide to government on where training package developments or review and other projects are necessary.

The Occupational Level enables us to understand the nuance of many occupations within our sector. We currently face challenges understanding key aspects of our sectors and occupations within it because of the inability to filter too many six digit ANZSCO codes. The proposed changes to disaggregate Aged and Disabled Carers, for example, are a very positive step that will enable us to better understand and describe these key occupations and whole workforces.

The classification hierarchy is also significant to HumanAbility stakeholders. Since our inception, limitations of the current ANZSCO have been raised in stakeholder engagement we have conducted – from our regional and remote and national forums, state and territory roadshows through to the many one-to-one meetings we've held with more than 1000 stakeholders across our sectors, nationally.

Noting the current ANZSCO is largely based on the 2001 labour market this review is timely to ensure the evolution and changes to Australia's industry and occupations that have happened over the last twenty years (just one example is the introduction of the NDIS) are reflected within the ANZSCO codes.

We note that, having only been established in July 2023, HumanAbility has not engaged extensively to date in the earlier ANZSCO comprehensive review consultations. Broadly we are pleased that most concerns raised with us by our stakeholders have been addressed in the proposed changes set out at this consultation stage.

Informed by our stakeholder engagement and written consultation with our five sectoral Industry Advisory Committees, we highlight in this submission aspects of the current ANZSCO list that do not adequately capture the significant changes in our sectors over the past two decades nor those we anticipate in the decades to come. We have considered whether proposed Skill Levels are appropriate, where there might be misalignment of similar roles across sectors that could have an adverse impact on another sector's workforce, sought to ensure specialisations are appropriately reflected in descriptions and highlighted where the proposed language is out of date with modern usage. Importantly we highlight the critical importance of Aboriginal and Torres Strait Islander cultural knowledge, skill and understanding being suitably valued and acknowledged through the associated Skill Level.

We are confident that by incorporating these final changes to the current proposals HumanAbility, and our stakeholders will have stronger data to understand our workforce in its current form as well as its future needs and opportunities.

Recommendations

Below is a summary table of HumanAbility recommendations, with a deeper explanation and further detail included under each section of this submission.

Code (current / proposed)	Recommendations
423111 Aged or Disabled Carer	-
423115 Disability Support Worker	Increase the proposed skill level to Skill Level 3.
42114 Disability Team Leader	Increase the proposed skill level to Skill Level 2.
423112 Aged Care Team Leader	Clarify or remove the specialisation from being linked with Aged Care Team Leader. Clarify the suitable settings for an Aged Care Team Leader.
Occupational code to be established (Childcare services)	Change the 'Childcare Services' occupational sector to 'Children's Education and Care'. Establish an Occupational code for 'In-Home Care Educator' role.
272111 Careers Adviser	Change the main title to Career Practitioner rather than listing this as an alternative.
311215 Pharmacy Technician	Maintain the Skill Level of a 311221 Community, and 311222 Hospital Pharmacy Technician at Skill Level 2 rather than decrease, as proposed, to Skill Level 3.
411511 Aboriginal and Torres Strait Islanders Health Worker	Increase to a Skill Level 3.
411513 Aboriginal and Torres Strait Islander Health Practitioner	Develop a distinct occupational code for Aboriginal and Torres Strait Islander Health Practitioners within the Health Diagnostic and Promotion Professionals (251) and retain these roles at Skill Level 2.
452315 Swimming Coach or Instructor	Reverse the order of words in the occupation name to be 'Swimming Instructor or Coach' and increase to Skill Level 3.
462331 Lifeguard	Make changes to the description and main tasks to better reflect the role and environments in which lifeguards work.
462131 Fitness Instructor (General)	Include 'Aqua Exercise Instructor' in the specialisation section of the proposed 452112 Fitness Instructor (general) occupational classification.
149113 Sports Centre Manager	Establish an Aquatic Centre Manager occupational code.
899937 Swimming Pool or Spa Technician	Change the name of this occupation to Swimming Pool and Plant Equipment Technician, that this role is a Skill Level 3 and that is re-categorised into the 3999 occupational category rather than be categorized in the 8999 occupational area. Add text to the description and main tasks of this role.

Response to each of the consultation lists within HumanAbility's remit

Consultation 1 Focus Areas

Aged Care and Disability Services

423111 Aged or Disabled Carer

The proposed separation of the Aged or Disabled Carer into five roles is a more up-to-date reflection of the diverse roles that have emerged within the Disability and Aged Care sectors. We highlight below important considerations to tighten the proposed re categorisation of the roles.

423115 Disability Support Worker

Currently the proposal is for this role to be Skill Level 4. It is our strong recommendation that this should be increased to a Skill Level 3.

This change would better align the role with findings related to Recommendation 3 of the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with a Disability (Disability Royal Commission), that the recognition and accreditation of workers' qualifications, including a mandatory minimum qualification equivalent to a Certificate III in Individual Support is considered.

In addition, the SCHADS Award Schedule B.2. defines Certificate IV as the appropriate qualification for disability support work, aligning Disability Support Worker to a Skill Level 3

Recommendation: Increase the proposed skill level to Skill Level 3.

42114 Disability Team Leader

Currently the proposal is for this role to be Skill Level 3. It is our recommendation that this should be increased to a Skill Level 2. Following on from our recommendation for the Disability Support Worker which should be a Skill Level 3 this would necessitate the Disability Team Leader being a skill level higher at Skill Level 2.

This change would also align the Disability Team Leader role with 423112 Aged Care Team Leader which is recognized as a Skill Level 2 in the proposed new classifications. These are equivalent roles with equivalent main tasks. To avoid attraction and retention issues in the disability sector, the two roles should be recognised as consistent Skill Levels.

Recommendation: Increase the proposed skill level to Skill Level 2.

423112 Aged Care Team Leader

The current proposal includes Specialised Dementia Worker as a specialisation category for this role. An Aged Care Team Leader who has the skills, knowledge and experience of a Specialised Dementia Worker is supported. However, as the proposal currently reads, the function of Specialised Dementia Worker (which is an important hands-on role with significant direct interaction with residents) could be confused or subsumed with the largely supervisory component of a leader's role.

Recommendation: more clarification or that the specialisation is removed from being linked with Aged Care Team Leader.

In addition, the creation of the Aged Care Team Leader role appears to be suitable for home care settings where a team leader may oversee multiple support workers. As Enrolled and Registered Nurses typically

manage this function in a residential care setting, the distinction should also be clarified to avoid confusion or inadvertent redundancies of nursing roles in residential care settings.

Recommendation: Clarify the suitable settings for an Aged Care Team Leader.

Childcare services

HumanAbility supports the changes to wording and occupational changes proposed. Outlined below are two additions of importance we recommend.

To reflect modern terminology, we strongly encourage further changes to the wording of this occupational sector to 'Children's Education and Care' rather than childcare services.

Recommendation: Change the 'Childcare Services' occupational sector to 'Children's Education and Care'.

421 xxx In-Home Care Educator

Currently there remains no proposed occupational code for In-Home Care Educator roles.

In-Home Care educators support the education and care of children in the child's home. These are funded roles that are provided to families who cannot access other types of approved care due to non-standard or variable work hours, geographic isolate from other types of care and complex or challenging needs.

The omission of this group as an occupation leaves a key group of educators without an occupation, the fall between Family Day Care Educator and Early Child Educator. Due to the description of both occupations, they actively exclude In-Home Care Educators from those occupation codes. The omission of these key childcare roles impacts accurate data collection and is likely to have impact on funding of these roles. Currently federally funded through the CCS program.

In-Home Care Educators would have a skill set aligned with 421115 Family Day Care Educator.

Recommendation: Establish an Occupational code for 'In Home Care Educator' role Welfare and Social Assistance

272111 Careers Adviser

The title "Career Practitioner" reflects the comprehensive, professional, and specialised nature of the work done by career development professionals.

In contrast, the term "Careers Adviser" is considered outdated and misses the opportunity to ensure that the updated ANZSCO provides a contemporary classification of occupations.

Further, the title "Career Practitioner" aligns with the Career Industry Council of Australia's (CICA) Professional Standards, reflecting the diverse roles in career counselling and development, unlike the more limited "Careers Adviser". Further it aligns with international terminology, ensuring consistency as the profession adapts to evolving labor markets and educational needs.

Aligning the title with "Career Practitioner" ensures that the profession is recognised for its full contribution to individuals' career development and aligns with national and international professional standards.

Recommendation: Change the main title to Career Practitioner rather than listing this as an alternative.

Consultation 2 Focus Areas

Medical Nursing and other care services

311215 Pharmacy Technician

Skill Level 2

The work done by a Pharmacy Technician, including taking medication history, assisting in dispensing and assisting in clinical and prioritisation and referral of medical and other allergies, is a high skill role and should remain as a Skill Level 2. Lowering the required Skill Level does not meet the role's Skill Level requirements and will likely have exacerbate existing challenges with attraction, retention and remuneration into these roles.

Recommendation: Maintain the Skill Level of a 311221 Community, and 311222 Hospital Pharmacy Technician at Skill Level 2 rather than decrease, as proposed, to Skill Level 3.

411511 Aboriginal and Torres Strait Islanders Health Worker

Proposed Skill Level 4

Deep Aboriginal knowledge and understanding is critical to the strength of these roles and the activities the staff are required to undertake.

The proposal to lower the Skill Level of these roles to a Skill Level 4 continues the undervaluing of the skills and deep knowledge and understanding that is needed to undertake this work.

A more accurate reflection of the skill and knowledge of the Aboriginal Health Practitioners and Workers roles would be as a Skill Level 3.

Recommendation: the Skill Level for Aboriginal and Torres Strait Islander Worker is increased to a Skill Level 3.

411513 Aboriginal and Torres Strait Islander Health Practitioner

Proposed Skill Level 3

Aboriginal Health Practitioners are AHPRA-registered health professionals who provide essential health services to priority populations in Australia. Their current classification under the Community and Personal Services major code group fails to accurately represent their status as clinically trained health professionals.

This misclassification is at odds with the Australian Government's National Aboriginal and Torres Strait Islander Health Workforce Strategic Framework and Implementation Plan, which emphasizes the importance of these practitioners. Furthermore, excluding this profession from professional recognition in censuses may inadvertently contribute to the delegitimization of Indigenous health knowledge by implying it is secondary to other allied health and medical treatment services.

Reclassifying Aboriginal Health Practitioners would not only provide a more accurate representation of their role but also align with government initiatives and support the recognition of Indigenous health practices.

Skill Level 2 maintain:

Aboriginal and Torres Strait Islander Health Practitioners are highly qualified professionals who must hold at least a qualification in Aboriginal and Torres Strait Islander Primary Health Care Practice and engage in continuous professional development to maintain their registration. While Aboriginal and Torres Strait Islander health workers primarily focus on liaising with patients, clients, and visitors in healthcare settings, Health Practitioners undertake more advanced responsibilities. These include developing and implementing self-management health programs, providing primary health care to clients, and conducting higher-level clinical assessments and care. These tasks, combined with the specialised knowledge required to deliver culturally safe healthcare, exceed the Skill Level 3 classification.

The complexity of their role, which integrates clinical expertise with cultural competence, warrants a higher skill level classification that accurately reflects their professional capabilities and the critical nature of their work in Indigenous healthcare.

Recommendation: develop a distinct occupational code for Aboriginal and Torres Strait Islander Health Practitioners within the Health Diagnostic and Promotion Professionals (251) and retain these roles at Skill Level 2.

Consultation 3 Focus areas

Sports Activities

We note that the feedback in this section has wide support in the sport and recreation sector and that the HumanAbility sport and recreation Industry Advisory Committee has provided support for the following feedback.

452315 Swimming Coach or Instructor

In the typical learn to swim journey, instruction is undertaken before coaching. For consistency, the occupation name should be reordered from the current proposed name.

Swimming coach or Instructor requires skill sets that are at the Certificate III level, and as such Skill Level for Swimming coach or Instructor should be increased to align with this from a Skill Level 4 to a Skill Level 3.

Recommendation: reverse the occupation name to be ‘Swimming Instructor or Coach’ and increase the Skill Level to 3.

462331 Lifeguard

We propose additional text (in the description and main tasks sections) as outlined below, clarifies the role of lifeguards and the environments in which they work.

The current description limits lifeguards to the preconceived areas of pools and beaches only. The tasks have been expanded in three places to describe the roles more completely and highlight the rules and regulations that Lifeguards operate within.

Recommendation: that the following changes (underlined) are made to the:

1. Description with the addition of the underlined text:
 - Looks after the safety of people at beaches, inland water environments, swimming pools, and aquatic facilities through supervision, accident prevention and rescue, and educating the public on water safety.
 - High levels of personal commitment, vigilance, physical fitness, and sporting ability may substitute for formal qualifications or years of experience.
2. Main tasks with the addition of the underlined text:
 - Supervises, scans and patrols designated areas to ensure the safety of swimmers and beachgoers
 - Identifies and assesses potential risks and hazards in the water and in immediately surrounding areas, e.g. on the beach, riverbanks or pool concourse
 - Enforces rules and regulations at beach, pool or other swimming locations to prevent accidents and maintain order

462131 Fitness Instructor (General)

The role of an Aqua Exercise Instructor is a specialisation that is required for fitness instructors and requires a different specialisation to that of Personal Trainer and Gym Instructor. This should be reflected through the inclusion of Aqua Exercise Instructor in specialisations for this role.

Recommendation: include ‘Aqua Exercise Instructor’ in the specialisation section of the proposed 452112 Fitness Instructor (general) occupational classification.

149113 Sports Centre Manager

The regulations and requirements for an Aquatic Centre Manager differ from that of a Sports Centre Manager rather than being specialist skills within a Sports Centre Manager occupation. It is a unique occupation with specific skills and requirements that differ from a Sports Centre Manager.

Recommendation: that Aquatic Centre Manager is created as a stand-alone occupation aligned with Sports Centre Manager rather than a specialisation of the 149113 Sports Centre Manager role.

899937 Swimming Pool or Spa Technician

There are several changes recommended for this role.

- Currently this role is coded 899937 (Other Miscellaneous Labourers) the current occupational category (8999) does not adequately align with the occupational grouping of roles that are technical and involve handling of chemicals. A change to 3999 category (Other Miscellaneous Technicians and Trades Workers) would be a more appropriate categorisation. Other more appropriate category alternatives include
 - 3699 Other Building Completion and Related Trades Workers,
 - 312 Building and Construction Technicians or,
 - 3991 Chemical, Gas, Petroleum and Power Generation Plant Technicians other classification is considered to better align with the occupational requirements.
- The current name does not adequately describe the occupation. An Aquatic Technical Operator is a distinct role from a Swimming Pool or Spa Technician; the title “Swimming Pool and Plant Equipment Technician” better reflects this distinction. Should a change of occupation name not be an option, at a minimum the existing name should be updated to Swimming Pool or Spa Technician (Aquatic Technical Operator).
- Skill Level 3 more appropriately reflects the key skill requirements of this occupation, including the handling of chemicals than the proposed Skill Level 4.

Recommendation: change the name of this occupation to Swimming Pool and Plant Equipment Technician, that this role is a Skill Level 3 and that is re-categorized into the 3999 occupational category rather than be categorized in the 8999 occupational area.

In addition, the current description and main tasks are missing key aspects of the role that relate to the skilled nature of this occupation and the activities that needed to be carried out.

Recommendation: add text (underlined) below, to the description and main tasks of this role.

1. Description: Installs, maintains, and repairs pool or spa equipment and systems, including handling of chemicals. Maintains, services, cleans, and assesses water quality in swimming pools or spas in both residential and commercial environments.
2. Main tasks: Conducts pool or spa maintenance, including storage, handling, and application of chemicals used for testing water quality, i.e. water sanitation and chemical balance, in accordance with relevant health and safety regulations and standards