

HumanAbility Submission

Jobs and Skills Australia 2025-26 work plan development -
Consultation paper

February 2025



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 Australia 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, the Jobs and Skills Council for the care economy, welcomes the opportunity to contribute to the Jobs and Skills Australia 2025/26 work plan. We have thoroughly enjoyed the collaborative approach to our mutually relevant work such as the ECEC Capacity study and note this work has been well received by our stakeholders across providers, unions and government.

The Care and Support sector is Australia's largest employer and fastest-growing industry ^{1 2}. Collectively the sectors employ over 20 per cent of the national workforce³.

One of five 'significant forces' identified in the government's 2023 Intergenerational Report³, the rise in demand for care and support services is driven by Australia's ageing population, greater participation by women in the workforce and the expansion of formal care arrangements for people with a disability, children and older people.

The people working in these sectors are supporting Australians to live healthier, more fulfilling lives. Their work is of critical importance to the nation's wellbeing and future growth. Yet, the current lack of workforce availability is one of the constraints impacting service provision and contributing to a significant level of unmet demand for services.

This submission, informed by extensive engagement with stakeholders across governments, unions, peaks and employers and workers, highlights allied health as an area of significance across care and support (aged care, disability, health and community services) where there is currently concerning incomplete data nor an understanding of the entire workforce.

Jobs and Skills Australia is well-placed to undertake a much-needed allied health capacity study that either includes, or has a focus on, the Allied Health Assistant workforce. This would develop a clear understanding of the size and breadth of the workforce, scope of practice and career pathways, and enhance workforce forecasting and planning.

Additionally, the sport and recreation sectors contribute significantly to the economic, health, and social fabric of society. However, data limitations obscure workforce trends, skills shortages, and employment pathways. Jobs and Skills Australia is ideally positioned to undertake a systematic aggregation of existing data and identify key data gaps, which would enhance workforce visibility and provide an evidence base for effective workforce planning.

Finally, as Jobs and Skills Australia continues work on the Core Skills Occupation List (CSOL) in its next workplan, we reiterate the concern we raised in our May 2024 submission to the CSOL consultation. Concurrent work on the essential skills pathway is critical to ensuring those roles that are lower paid and now excluded from the CSOL threshold but remain in severe shortage, have a migration pathway available to them.

¹ Overseas Health Practitioner Regulatory Settings Review – Final Report, 2023, p63.

² Care and Support Economy – state of play, Prime Minister and Cabinet, May 2024. <https://www.pmc.gov.au/sites/default/files/resource/download/care-support-economy-state-of-play.pdf>

³ Australian Bureau of Statistics (ABS) 2021, Labour Force, Australia, Detailed, August 2021

Recommendations

We recommend that Jobs and Skills Australia include the following in their 2025/26 workplan, which we have mapped to the 'JSA five strategic commissioner outcomes' (in blue).

- 1. Undertake an Allied Health Capacity Study in partnership with HumanAbility that considers, comprehensive workforce mapping, collection and synthesis of data on scope of practice, and career pathways.**

[Understanding today's workforce](#)
[Shaping Australia's Future Workforce](#)
[Optimising pathways and system architecture](#)

- 2. Conduct a targeted sector-wide sport and recreation capacity study that aggregates existing workforce data, identifies data gaps (including seasonal workforce trends), enhances classification frameworks and would support capacity-building for industry.**

[Understanding today's workforce](#)
[Shaping Australia's Future Workforce](#)
[Optimising pathways and system architecture](#)
[Activating Informed Dialogue](#)

- 3. Engage with Department of Home Affairs to ensure the Essential Skills Pathway noted in the Migration Strategy is initiated to provide a migration pathway for essential, lower paid roles, particularly in the care and support sector.**

[Shaping Australia's Future Workforce](#)
[Optimising pathways and system architecture](#)

Allied Health

Allied health is an integral part of Australia's care sector but there is little data or understanding of the Allied Health Assistant workforce.

Extensive research shows that demand is increasing across the care and support sector, that the models of care are evolving, and the scope and complexity of care is changing. Allied health plays a significant role in meeting this demand and is forecast to have an increasing role in the changing shape of care in decades to come.^{4 5 6 7}

Allied health is a part of aged care, disability support and primary health care. It includes but is not limited to audiometry, physiotherapy, speech pathology, podiatry, dietetics, optometry, orthoptics, counselling and psychology, social work, prosthetics and orthotics, occupational therapy, and a broad range of other services.

The Royal Commission into Aged Care Quality and Safety includes forecasts of the Allied Health Workforce making up the bulk of growth in the Workforce over the coming decades.

Between 2019-20 and 2020-21 there was a 36 per cent increase in Australians receiving at least one Medicare-subsidised allied health service. A total of 27 million Medicare-subsidised allied health services were accessed in one year.⁸

Yet, as with the Royal Commission into Aged Care, the Independent Review of Overseas Health Practitioner Regulatory Settings (the Kruk review)⁹ highlighted, there are extensive shortages across allied health professions and challenges in recruiting and retaining Allied Health Professionals in primary care, disability support and aged care services. This is exacerbated in regional and remote areas.

However, there is currently limited data to provide policymakers a strong understanding of the whole allied health workforce that is, the Allied Health Professional and the Allied Health Assistant workforces. The current *Draft Allied Health Workforce Strategy*¹⁰ specifically excludes Allied Health Assistants.

The Allied Health Assistant workforce provide direct care and support in the implementation of programs with clients, developed by Allied Health Professionals and to undertake administrative tasks to assist in client care being efficient and effective.

Up to 17 per cent of an Allied Health Professional's workload could be carried out by Allied Health Assistants¹¹. The work that is (and could be) carried out by an Allied Health Assistant enables the Allied Health Professional to complete more complex work and would lead to greater access to services for a larger number of consumers¹².

⁴ Jobs Skills Australia, Early Childhood Education and Care Workforce Capacity Study, 2024.

⁵ Royal Commission into Aged Care Quality and Safety. *Final Report: Care, Dignity and Respect* 2021

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⁷ National Nursing Workforce Strategy, Consultation and Research Summary Report, 2024.

⁸ Australian Institute of Health and Welfare (AIHW) (July 2022) General practice, allied health and other primary care services Independent review of Australia's regulatory settings relating to overseas health practitioners. Final Report. Robyn Kruk 2023

¹⁰ Draft Allied Health Workforce Strategy: Accessed 20 February 2025 at https://consultations.health.gov.au/primary-care-mental-health-division/nahwsdraft/supporting_documents/Consultation%20Draft%20v2.0.pdf

¹¹ Somerville, L., Davis, A., Elliott, A. L., et al., 'Building allied health workforce capacity: a strategic approach to workforce innovation', Australian Health Review, Aust Health Rev, 39(3): 264-270, <https://doi.org/10.1071/ah14211>.

¹² Victorian Government, 2023, Victorian Allied Health Assistant Workforce Project (p2)

Allied Health Assistants can make a significant contribution to reducing the pressure in services that have shortages of Allied Health Professionals. Their function can free up a significant amount of capacity in the already-stretched Allied Health Professional workforce, it can increase access to services in regional and remote areas and contribute to reducing waitlists.

While there is a recognised national shortage for some allied health professions, data on other Allied Health Professionals is limited or difficult to quantify and there is little to no data on Allied Health Assistants. Studies have shown that Allied Health Assistants are underutilised in alleviating the service delivery pressures currently faced by practitioners and service providers¹³. However, the lack of data available on workforce demographics, the nature and location of services, and the number of workers required, inhibits a full understanding of what is needed to change this.

The Draft National Allied Health Workforce Strategy is currently open for consultation. The draft strategy specifically excludes Allied Health Assistants, despite including specific actions to support progression from vocational education and training sector pathways into higher education for Allied Health Professional qualifications¹⁴. Without changes to the final strategy to incorporate the whole Allied Health workforce, the strategy will not be able to address the significant gaps in understanding the Allied Health Assistant workforce.

Aggregating existing data and identifying where there are gaps would be a significant contribution to workforce planning across not only the allied health workforce but the care and support sector workforce more broadly. Comprehensive data would enable:

- Identification of where Allied Health Professionals are working below their Scope of Practice (which could be addressed by Allied Health Assistants) and where Allied Health Assistants may be being used beyond their Scope of Practice (such as in hospitals during the COVID-19 pandemic) to fill other workforce shortages.
- Determination of whether Allied Health Assistants are in shortage, and if so, where (sectors and geographically) and in what disciplines.
- Consideration of the role of the allied health workforce (both Allied Health Professionals and Allied Health Assistants) in meeting the ambition of other national workforce strategies including nursing, mental health, aged care, and the National Disability Insurance Scheme (NDIS).
- Provide focused analysis of the role of Allied Health Assistants in regional and remote areas, particularly in First Nation communities and in the ACCO workforces.
- Analysis of the extent to which Allied Health Assistants provide multi-functional support, such as implementing care plans from multiple Allied Health Professionals for a single patient or their role in virtual or home-based care models.
- Better understanding of Allied Health Assistant demographics and workforce trends, aligned with Allied Health Professional data, to inform workforce planning and address issues of attraction, retention, and job satisfaction

Recommendation 1: JSA to undertake an Allied Health capacity study in partnership with HumanAbility

Using the ECEC capacity study as a model, HumanAbility suggest JSA undertake an Allied Health capacity study that considers:

¹³ Huglin J, Whelan L, McLean S, Greer K, Mitchell D, Downie S, Farlie MK. Exploring utilisation of the allied health assistant workforce in the Victorian health, aged care and disability sectors. BMC Health Serv Res. 2021 Oct 23;21(1):1144. doi: 10.1186/s12913-021-07171-z. PMID: 34686210; PMCID: PMC8540135.

¹⁴ Draft Allied Health Workforce Strategy, page 7, 20, 26-28 and 30-31 : Accessed 20 February 2025 at https://consultations.health.gov.au/primary-care-mental-health-division/nahwsdraft/supporting_documents/Consultation%20Draft%20v2.0.pdf

- **Comprehensive workforce mapping:** A snapshot of the entire allied health workforce (both Allied Health Professionals and Assistants) detailing numbers employed, distribution across service settings and geographic location,
- **Scope of Practice Analysis:** Collect and synthesize data on how tasks and responsibilities are allocated across the allied health workforce, particularly between Professionals and Assistants, to inform workforce planning. This could also inform potential interaction between the scope of practice of the allied health workforce and delivering on reforms to the NDIS and current commonwealth workforce strategies (allied health, nursing, aged care, disability and early childhood education and care).
- **Career Pathways Overview:** Gather and present data on typical progression route.

Sport and Recreation

The Sport and Recreation Workforce's role in Public Health

The sport and recreation workforce is a key contributor to community well-being and public health, including preventative health. The industry provides essential employment pathways for many Australians, into meaningful job opportunities, including but not limited to, young people entering the workforce, women returning to work, and Aboriginal and Torres Strait Islander people^{15 16}. Many individuals begin their careers in the sector through voluntary roles such as coaching, umpiring, or supporting local clubs, gaining transferable skills in leadership, teamwork, and communication. For First Nations communities, sport and recreation can also serve as an avenue for cultural connection, community leadership, and economic participation^{17 18 19}.

Beyond its workforce impact, sport and recreation plays a crucial role in preventative health. Regular participation in physical activity helps reduce the risk of chronic illnesses such as heart disease, obesity, and mental health conditions. Structured programs—including youth sports initiatives, school camps, and adventure-based activities—encourage lifelong healthy habits while alleviating pressure on the healthcare system. The benefits extend beyond individuals, fostering healthier, more connected communities.^{20 21}

HumanAbility has engaged extensively with stakeholders at our state, territory, and national forums and through our Industry Advisory Committee within the sport and recreation sector. We have gained additional deep insights from our interviews and workshops associated with the review of the Outdoor Leadership and Recreation qualifications. What we have heard during these engagements are supported by other relevant research and sources. One of the most prominent themes emerging from these engagements—and supported by additional research—is the lack of reliable, comprehensive workforce data in the sport and recreation sector.

¹⁵ <https://www.dlgsc.wa.gov.au/department/publications/publication/careers-in-sport-and-recreation>

¹⁶ <https://www.royallifesaving.com.au/about/news-and-updates/news/2021/may/lifeguard-and-swim-teacher-shortage-provides-opportunities-for-job-seekers?>

¹⁷ <https://www.csi.edu.au/education/student-stories/the-ripple-effect/>

¹⁸ <https://www.abc.net.au/news/2024-06-30/desert-lifeguards-reviving-pools-remote-central-australia/104003608>

¹⁹ Sport, more than just a game – contribution of sport to Indigenous wellbeing and mentoring, House of Representatives Standing Committee on Aboriginal and Torres Strait Islander Affairs, June 2013, Canberra.

²⁰ <https://www.clearinghouseforsport.gov.au/kb/vb-preventive-health>

²¹ <https://auscamps.asn.au/about/latest-news/why-camps-and-outdoor-education-experiences-are-so-essential-school-students>

Workforce Data Challenges

Despite its significance in the lives of Australians, the sport and recreation sector does not have particularly useful or comprehensive workforce data. This makes it difficult for the sport and recreation industry and workforce to be accurately reflected in broader policy settings. It also hinders the ability to plan for future workforce needs and makes it difficult to accurately assess workforce trends, economic impact, and training needs.

International examples demonstrate quality workforce data that can drive better policy and training alignment and strengthen sector planning and training pipelines²². HumanAbility has identified areas that require further examination, including:

- Until recently, ANZSCO data for the sport and recreation field was largely at the four-digit level, grouping vastly distinct roles together (e.g. lifeguards and professional athletes under "sportspersons"), making workforce insights difficult to extract. Further analysis of the newly available six-digit data could help improve sector understanding and workforce planning.
- ANZSIC classifications fail to adequately distinguish between different business types, such as outdoor education providers and amusement parks, further complicating workforce tracking.
- Concerns have been raised by the sector that seasonal and part-time employment results in many workers being classified under other industries, leading to workforce underreporting in census data.
- Regional and remote workforce dynamics are poorly understood, despite the sector serving as an important employment entry point in these areas.
- Skills shortages may not be accurately reflected in data and workforce planning, particularly in high-demand areas such as water safety, outdoor recreation, and fitness.

The recent addition of six-digit occupation codes in the Jobs and Skills Atlas is a positive step, and future OSCA improvements will further enhance workforce visibility.

Recommendation 2: Strengthening Workforce Data and Sector Collaboration in sport and recreation

While we recognise that the necessary elements to fully achieving recommendation two fall within the remit of a range of stakeholders, there are some immediate and much needed steps that JSA could initiate, as set out below:

- **Lead targeted workforce mapping** to identify existing workforce data, gaps, and opportunities for improved classification (e.g. in ANSZIC).
- **Enhance data aggregation and workforce analysis**, ensuring the sector has access to reliable workforce insights from existing data sources.
- **Identify opportunities for data improvements**, aligning workforce tracking with broader national skills and employment strategies.

Given the challenges outlined above, HumanAbility proposes that JSA undertake some targeted work with this sector, to:

- **Aggregate and analyse existing data** to better understand workforce composition and employment trends.
- **Identify workforce gaps** that support training and workforce development.

²² <https://www.cimspa.co.uk/globalassets/document-downloads-library-all/insight/cimspa-workforce-insight-report-2023.pdf>

- **Examine seasonal workforce trends and sector mobility data**, including gaps in data, and other sources of data that can support improved knowledge of the seasonal workforce and, ideally, what industries seasonal workers transition between, including within the health and community services industries.
- **Support sector-led capacity building** by exploring sustainable workforce analysis tools for industry stakeholders.

Consideration of the Essential Skills Pathway alongside developing the Core Skills Occupation List

HumanAbility was pleased to respond to the Jobs and Skills Australia consultation on its draft Core Skills Occupation Lists (CSOL) in 2024 and note JSA will continue work on the CSOL in its 2025/26 workplan.

In our submission to that consultation, we recognised that many of the Care and Support sector roles within our remit fall outside the new CSOL income parameters (earning above \$70,000 and below \$135,000 per annum). We raise that until the Department of Home Affairs begin undertaking a consultation on the Essential Skills Pathway (with a specific focus on the ‘low-paid’ essential care and support workforce) proposed in the migration strategy, Jobs and Skills Australia is limited in drafting or developing an Essential Pathway occupation list.

However, in the context of JSA’s 2025/26 Workplan and a continuing focus on the CSOL, we again highlight the significant inter-connection of the VET (‘low-paid’) workforce to the *whole* workforce. Migration pathways for ‘low-paid’ roles are often important in temporarily filling immediate shortages, identifying where temporary migration can present a career pathway to more skilled and higher paid roles (also experiencing shortages) and in reflecting the number of support roles that are often needed to support the more specialised care and support roles.

Without a simultaneous consultation or clear timeline of how some of the shortages that have, to-date, relied on temporary migration to fill gaps, our stakeholders continue to highlight where there are critical sectors facing uncertainty about their workforce.

We encourage Jobs and Skills Australia to raise this with the Department of Home Affairs in the interests of JSA fulfilling its role in ensuring evidence-based workforce planning.

Recommendation 3: JSA to engage with the Department of Home Affairs to ensure the Essential Skills Pathway supports critical roles where domestic supply remains a challenge.