

HumanAbility Submission

Jobs and Skills Australia draft Core Skills Occupation List (CSOL)
consultation

May 2024



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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.

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Executive Summary

HumanAbility is the Jobs and Skills Council for the Care 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 Government's recent review of the Migration system and subsequent migration strategy, and we are pleased to respond to the Jobs and Skills Australia consultation on its draft Core skills Occupation Lists (CSOL).

Our submission reflects the workforce shortage challenges we have heard our stakeholders consistently raise over the course of the last 12 months, and which are frequently exacerbated in rural, regional and remote areas.

We acknowledge 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) and that the Department of Home Affairs will be undertaking a consultation on an Essential Pathway (with a specific focus on the 'low-paid' essential care and support workforce). We also note that the JSA modelling considers the multiple ways in which shortages can be addressed, including and beyond migration.

None-the-less we take this opportunity to 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 but are now on the 'confidently off' list, there are critical sectors facing uncertainty about their workforce.

Finally, we highlight recent data and specific stakeholders in the Early Children's Education and Care sector that we encourage JSA to consider in making a final recommendation on roles within this sector for its final draft CSOL.

Recommendations

Recommendation one: More clarity is required to determine how roles that no longer meet the CSOL parameters will be required in other migration lists.

Recommendation two: The finalisation of the CSOL should reflect consideration of whole-of-sector workforce implications by ensuring workforce shortages in both the tertiary and VET qualified workforces have a migration pathway, where that is deemed a necessary part of filling workforce shortages.

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.

Our Submission

Trends indicate that the care and support workforce will need to double in size to meet demand in the next 40 years.

The Care and Support sector is Australia's largest and fastest-growing industry: accounting for 15 per cent of total employment and increasing by 6 per cent in the last year.¹ This growth in employment is not limited to the tertiary educated workforce; 'around 44% will have VET as the primary pathway (Skill Levels 2 to 4) over the next 10 years'².

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.

Our Stakeholders

Since our inception, HumanAbility has spoken with well-over 500 stakeholders representing employers, peak bodies, associations, unions, training organisations, workers, students, government, Aboriginal Community Controlled Organisations and providers, from metro, regional, rural and remote locations across Australia. The experience of our stakeholders is consistent with that of broader research not limited to that noted in the Australian draft Care and Support Strategy, the Intergenerational Report 2023 and Working Future: The Australian Government's White Paper on Jobs and Opportunities. Their experience, knowledge and perspectives inform our position and recommendations to the Jobs and Skills Australia (JSA) draft Core Skills Occupation List (CSOL).

The role of migration for the Care and Support Sector workforce

Migration is not the sole channel of supply for these sectors. Workforce shortages across the care and support sector exist because of a lack of recognition of skills, a lack of applicants, low wages, and applicant perceptions that the job is unattractive and that workloads are unacceptable. Workforce and skills shortages are further exacerbated in regional, rural and remote communities.

There are significant opportunities that lie within the domestic marketplace. This is further reiterated in the Australian Government's White Paper on Jobs and Opportunities which recognises the importance of investing in domestic skills and training, with targeted migration pathways complementary to domestic workforce supply activities.⁴ All parts of the education and training sector (i.e. school, VET and higher education) play an enabling role in the supply of workers and skills to industry, along with the wider Industrial Relations, tax and policy reform environments.⁵

However, targeted migration is an important part of addressing care and support workforce shortages and both temporary and permanent migration pathways contribute to filling these shortages.

¹ Jobs and Skills Australia, National Careers Institute (2023). Australian Jobs 2023.

² Jobs and Skills Australia (October 2023), Towards a National Jobs and Skills Roadmap – Summary <[2023_annual_jobs_and_skills_report\(2\).pdf](#)>p14

³ Australian Government. [Intergenerational Report 2023 Australia's future to 2063](#). Source: Commonwealth of Australia.

⁴ Commonwealth of Australia (September 2023) [Working Future. The Australian Government's White paper on Jobs and Opportunities](#), accessed 26 September 2023

⁵ HumanAbility (December 2023) Workforce Plan, Australia p7

Our submission outlines ways in which proposals in the draft CSOL will affect the care and support workforce.

The parameters of the draft CSOL and implications for the VET Care and Support workforce

A key finding of the Migration Review which informed Australia's Migration Strategy⁶ was that 'labour needs are growing in some lower paying sectors... and may not be able to be fully met from within a domestic workforce'. We acknowledge and appreciate the Government's commitment to explore an 'Essential Skills Pathway'⁷ primarily related to pathways in the care and support economy.

HumanAbility agrees with the sentiment expressed in the Migration Strategy, that 'increased lower paid migration presents complex economic and ethical challenges.' It is also the view of HumanAbility low pay is a fundamental deterrent for people to enter and remain in the care and support sector, and this should be addressed through a range of other mechanisms outside the migration system.

However, there is a risk that the JSA drafting recommendations for the CSOL, reflecting the changed parameters recommended in the Migration Strategy, without simultaneous consultation on the 'Essential Skills Pathway' or alternative avenues for roles that are not on (or have been removed from) the CSOL could exacerbate some sector workforce shortages, at least in the short term.

We acknowledge the changed income parameters for the CSOL (lifting the minimum income of occupations listed from \$53,000 to \$70,000) is the reason that many areas that continue to have clear evidence of workforce shortages are now on the 'off' or 'consult' lists, and not because they are no longer roles in need. However, without information of alternative temporary migration pathways for recruiting into these roles, stakeholders across our sectors are concerned about the workforce implications they face in the immediate or longer term.

Recommendation one: More clarity is required to determine how roles that no longer meet the CSOL parameters will be required in other migration lists.

There are many roles on the 'off' list (see full list of identified roles in table below) that benefit directly from temporary or permanent residency to fill shortages. In addition, there are areas of workforce shortage that can be addressed by having clear pathways (often via VET as an entry point) e.g. Community Worker to Social Worker, Ambulance Officer to Paramedic. Further, some roles on the 'off' list play a specific and essential function in supporting higher paid roles and providing a buffer where there are workforce shortages that have a long lead time to train or fill (because they are more specialist roles). These 'support' roles often help to minimise the adverse effects of shortages in more skilled roles, by supporting clients or patients to some extent, until they can see a specialist.

For example:

- An audiometrist can conduct hearing tests and assist with hearing aids, in the absence of an audiologist. This is particularly important in supporting regional and remote audiology workforce shortages.
- There is increasing capacity for pathology collectors with additional training to use technical advancements that allow them to do pathology tests on site, in the absence of a pathologist.
- Welfare workers, counsellors, and similar roles play an important role in minimising escalation to need social workers and psychologists.
- Enrolled Nurses and Health Assistants can take significant pressure off Registered Nurses.

⁶ The Australian Government Department of Home Affairs, (2023), Migration Strategy, Canberra, Australia <[Migration Strategy \(homeaffairs.gov.au\)](https://www.homeaffairs.gov.au/migration-strategy)>p51

⁷ A recommended area for future reform is to 'consider how best to regulate migration for lower paid workers with essential skills'. In explaining an 'Essential Pathway' the strategy goes on to say 'The Government consideration [of this] is primarily in the context of the care and support economy...'. <[Migration Strategy \(homeaffairs.gov.au\)](https://www.homeaffairs.gov.au/migration-strategy)>p51

There are roles now listed on the 'off' list (particularly but not limited to those in the sport, recreation and outdoor education sectors) that have typically been filled by overseas travellers who are an appropriate fit for this kind of work, for temporary periods of time. This allows the necessary time to train and qualify more permanent staff, locally e.g Outdoor Adventure Guides, White Water Rafting Guides. The removal of these roles from the draft CSOL in the absence of consultations occurring regarding other migration pathways for such roles risks industry and workforce uncertainty.

Recommendation two: The finalisation of the CSOL should reflect consideration of whole-of-sector workforce implications by ensuring workforce shortages in both the tertiary and VET qualified workforces have a migration pathway where that is deemed a necessary part of filling workforce shortages.

Our response to each of the draft lists

Roles that appear on one of the three JSA draft lists ('to consult', 'confidently on' or 'confidently off'), fall into the HumanAbility care and support VET-qualified workforce and that we are concerned remain in shortage, are listed in the three tables below.

We encourage JSA and the Department of Home Affairs to consult further with affected stakeholders on roles that may no longer meet the parameters of the CSOL to find alternative migration pathways where appropriate.

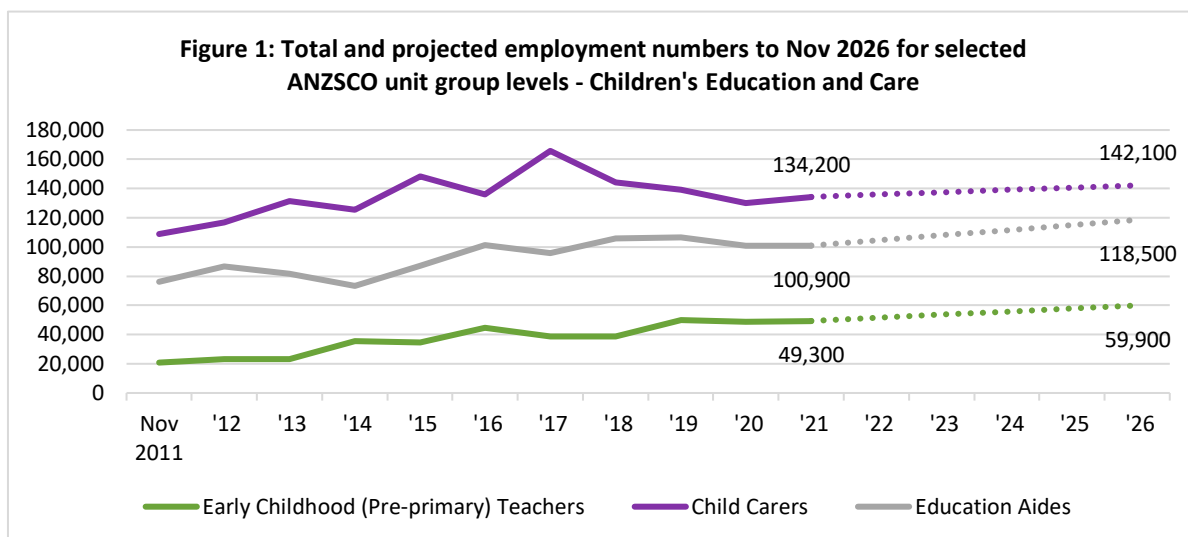
The 'consult' list – Child Care Workers and Out of School Hours Care Workers

ANZSCO	ANZSCO Description	
272612	Recreation Officer \ Recreation Coordinator	
411611	Massage Therapist	
411715	Residential Care Officer	
421111	Child Care Worker	In critical shortage.
421114	Out of School Hours Care Worker	In critical shortage.
452313	Horse Riding Coach or Instructor	
452315	Swimming Instructors	We suggest adding 'swim instructors' to the consultation list.

There is a national shortage of qualified ECEC workers across the country across all segments. This has a direct impact on service quality and meeting regulatory requirements, with the educator-to-child ratios and minimum qualification requirements set under the Education and Care Services Regulations having become challenging for service providers to meet.

Given the significant social and economic benefits that flow from ECEC, attracting, developing and retaining a high quality ECEC workforce is an imperative.

Strong growth is forecast across all areas of the workforce (see Figure 1). Between November 2021 and November 2026, an additional 36,100 workers are forecast to be needed across the sector. The forecast and vacancy trends further stress the need to urgently address shortages with long-term sustainable solutions.



Note: Forecasts are based as of November 2021. Source: National Skills Commission (NSC), [Employment Projections to 2026](#), Labour Market Insights website, accessed 26 September 2023.

The labour shortages facing the sector involve multiple and interconnected issues for service providers and regulators to navigate. The evidence-based connection between educator-student ratios, educator qualification levels, and service quality makes managing these shortages an even greater challenge.

As there has been little prior or subsequent research on how issues raised in the migration review affect the Early Children's Education and Care sector specifically, we encourage JSA and the Department of Home Affairs to consult closely with Goodstart, Australia's largest provider of ECEC services. HumanAbility also suggests JSA consulting with Community Childcare Association, Community Early Learning Australia and Early Learning Association Australia. We note and are confident that the Jobs and Skills Australia Early Childhood Education and Care Report, when released, will provide an invaluable resource to inform these considerations.

The 'confidently off' list

The following roles continue to have significant shortages and we encourage consideration of a migration pathway on an alternative list before finalising their removal from the CSOL.

ANZSCO	ANZSCO Description	
134111	Child Care Centre Manager	
149112	Fitness Centre Manager	
149113	Sports Centre Manager	
272199	Counsellors	This role can be Higher Ed. or VET qualified, suggest this should be on the 'consult' list.
272613	Welfare Worker	As above.
311216	Pathology Collector \ Phlebotomist	
411711	Community Worker	
411712	Disabilities Services Officer	
423411	Child or Youth Residential Care Assistant	
423413	Refuge Worker	
452214	Mountain or Glacier Guide	The necessary range of courses are not available in Australia. The industry and we rely on specialists from overseas or Australians training overseas for specialist roles.

452215	Outdoor Adventure Instructor	
452216	Trekking Guide	
452217	Whitewater Rafting Guide	
452299	Outdoor Adventure Guides	
452314	Snowsport Instructor	
452414	Lifeguard	

The 'confidently on' list

Feedback from HumanAbility stakeholders indicates that the inclusion of the following roles on the draft CSOL is necessary and supported.

ANZSCO	ANZSCO Description	
241111	Early Childhood (Pre-primary School) Teacher	(AQF level 1. HumanAbility supports this inclusion because they are needed to supervise Diploma level students in the workplace)
272112	Drug and Alcohol Counsellor	
411111	Ambulance Officer	
411411	Enrolled Nurse	
411713	Family Support Worker	
411716	Youth Worker	