

HumanAbility Submission

Occupation Standard Classification for Australia (OSCA) Maintenance Strategy

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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 Owners and Custodians of Country throughout Australia. We pay our respects to Aboriginal and Torres Strait Islander Elders – past and present, and recognise their enduring connection to their culture, lands, seas, waters and communities.

About HumanAbility

HumanAbility is the Jobs and Skills Council (JSC) 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 (CEC), 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

The transition from Australian and New Zealand Standard Classification of Occupations (ANZSCO) to OSCA represents a meaningful step forward for the care and support sectors. HumanAbility supports the five principles underpinning change to OSCA — particularly stakeholder engagement — as essential to ensuring the classification reflects real-world workforce dynamics.

The proposed maintenance strategy and review cycle provide a strong foundation to continue these improvements over time. We are especially pleased with the increased granularity and visibility of roles within the care and support workforce. The five-year structural review cycle, alongside occupation-level updates in 2027 and 2029, will create regular opportunities for stakeholder input and data refinement. We also support the March timing for updates, which ensures alignment with key inputs to the Skilled Migration Program.

In this submission, HumanAbility responds to questions 8, 9, 13 and 14, which relate to underpinning components of the OSCA maintenance model, impacts of timing, prioritisation criteria, and general comments on the strategy.

We would like consideration to be given to the following:

- **Introducing a sixth principle** that explicitly focuses on increasing visibility of traditionally female-dominated occupations across all sectors. This additional lens would help embed equity, social infrastructure, and inclusive workforce planning across the maintenance framework.
- **Earlier and staged engagement with Jobs and Skills Councils**, ideally six months prior to consultation phases, to enable evidence-based input and better sequencing of related policy dependencies such as Skilled Migration and Essential Pathways.
- **Increased granularity for underrepresented roles**, particularly in the disability, allied health, and nursing sectors, to better capture evolving occupational structures and extended scopes of practice.
- **Incorporation of gender, disability, and cultural lenses** into prioritisation criteria, including the use of sector-specific data sources (e.g., Aged Care Workforce Census, National Disability Services (NDS) datasets) to identify emerging roles and correct misclassification.
- **Recognition of the care and support sector as essential economic infrastructure**, and the inclusion of social infrastructure benefits in productivity-based prioritisation, acknowledging this sector's role in enabling workforce participation, especially for women and informal carers.

- **Stronger focus on Aboriginal and Torres Strait Islander roles**, ensuring culturally specific positions are not obscured within generic categories and that updates are shaped by meaningful engagement with First Nations communities, including co-design, as appropriate.

These changes would strengthen OSCA's role as a modern, inclusive, and responsive classification system that reflects Australia's evolving labour market—particularly in high-growth, high-impact sectors like care and support, which include sectors such as aged care, disability, children's education and care and sport and recreation.

HumanAbility Submission

This submission responds to the Australian Bureau of Statistics (ABS) survey questions 1, 8, 9, 13 and 14, which relate to underpinning components of the OSCA maintenance model, impacts of timing, prioritisation criteria, and general comments on the strategy.

Are there any other components which should underpin the maintenance of OSCA? (Question 8)

HumanAbility supports the 5 principles for implementing change to OSCA, in particular, principle 2 – stakeholder engagement – as a key source of expertise to ensure the updates reflect reality.

Further recommendation:

Introduce a 6th principle focussed on increasing the visibility of traditionally female-dominated occupations across all sectors, such as in the Health Care and Social Assistance sector, in which 76 per cent of the workforce are women, and the Education and Training sector, in which 70 per cent of the workforce are women.²

Changes introduced as part of the move from ANZSCO to OSCA will substantially increase the granularity and visibility of such traditionally female dominated workforces. HumanAbility particularly welcomes, for instance, the reclassification of Early Childhood Education and Care, and Aged Care and Disability Services, into multiple new 4-digit and 6-digit codes.

It is vital to continue to monitor and review opportunities to increase the visibility of gendered roles, as they evolve.

An example of areas where there is still opportunity to consider further granularity is for Enrolled Nurses (4411 OSCA). At last count there were 19-23,000 enrolled nurses with multiple specialisations.³

¹ Australian Bureau of Statistics (2025) *OSCA Maintenance Strategy Questionnaire* <https://consult.abs.gov.au/osca/osca-maintenance/consultation/subpage.2025-02-18.9240999729/>, accessed 17 March 2025.

² Jobs Skills Australia (2024) Industry profiles. Available at: <https://jobsandskills.gov.au/data/occupation-and-industry-profiles>, accessed 24 March 2025

³ N. Cortis, Y. Naidoo, M. Wong & B. Bradbury (2023) *Gender-based Occupational Segregation: A National Data Profile, final report*, Prepared for The Fair Work Commission, UNSW Social Policy Research Centre, Sydney, Table 5.1 on p.27. <https://www.fwc.gov.au/documents/consultation/gender-based-occupational-segregation-report-2023-11-06.pdf> (note the 23,000 figure on page 27, table 5.1 references ABS data. However, the figure of 19,400 is used in the Jobs Skills Australia (2024) *Industry Profile for Enrolled Nurses*,. <https://www.jobsandskills.gov.au/data/occupation-and-industry-profiles/occupations/4114-enrolled-and-mothercraft-nurses#:~:text=Summary,a%20Registered%20Nurse%20or%20Midwife>. Accessed 21 March, 2025.

This challenge has also been identified in workforce strategies and policy documents, particularly within the health care sector.

“The lack of consistent, nationally available workforce data remains a critical barrier to understanding the scope, distribution and capacity of the allied health workforce.”⁴

“There is limited national data on the specialisations or sub-sector roles undertaken by enrolled nurses despite their significant contribution in areas such as aged care, mental health, and disability... Workforce planning needs to capture more detailed role delineation, including where enrolled nurses are undertaking extended skillsets or specialist practice.”⁵

Further opportunities may exist to increase granularity reflecting a gender lens and disability lens. As highlighted in the Final Report of the Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability, for example, there is a scarcity of detailed data on the disability workforce — including key enabler roles such as Auslan interpreters and Disability Employment Services staff.⁶ This lack of visibility makes it difficult to identify workforce shortages and take informed action, such as investing in targeted training to meet demand.

What are the impacts of the proposed timing for your organisation? (Question 9)

HumanAbility supports:

- Maintaining a five-year review cycle for structural updates to ensure data comparability and track workforce trends over time, which we can use in our JSC dashboard, workforce and sector plans.

⁴ Department of Health and Aged Care (2025) *Draft National Allied Health Workforce Strategy- Consultation Draft - V2.0*, page 9, https://consultations.health.gov.au/primary-care-mental-health-division/nahwsdraft/supporting_documents/Consultation%20Draft%20v2.0.pdf accessed 20 March, 2025

⁵ Department of Health and Aged Care (2023) *Draft National Health Workforce Strategy 2023–2033*, page 47 developed under the Morrison Australian Government and formerly available via the Department of Health and Aged Care’s website in mid-2023. The document is no longer publicly accessible.

⁶ Royal Commission into Violence, Abuse, Neglect and Exploitation of People with Disability (September 2023) *Final Report- Volume 7, inclusive education, employment and housing* <https://disability.royalcommission.gov.au/publications/final-report-volume-7-inclusive-education-employment-and-housing> , accessed 27 March, 2025.

- The proposed occupation-level updates in 2027 and 2029, ahead of the structural update in 2030.
- The March timing for updates, as these directly inform Jobs Skills Australia's (JSA) inputs into the Skilled Migration program, including the Core Skills Occupation List (CSOL) and Occupation Shortage List (OSL) released each August.

Further recommendations and suggestions:

- HumanAbility would welcome engagement by the ABS with the Jobs and Skills Councils earlier than the proposed submission phase. A model similar to the JSA's engagement on the OSL, which begins six months prior to the OSL release, would allow for meaningful collaboration. Early engagement enables time for deliberation, evidence collection, and sector-specific analysis ahead of public consultation. Consultation processes should also be staged to ensure dependencies flow logically.
- In addition to the CSOL and OSL, the timing of updates should also support the Department of Home Affairs' Essential Pathway work, which focuses on low paid essential roles. This includes many occupations within the care and support workforce and is closely interconnected with the broader migration policy framework.

Are there any other factors which should be included within the prioritisation framework? (Question 13)

HumanAbility supports the early identification and prioritisation of specific roles for inclusion during key OSCA maintenance periods.

Recommendations and further suggestions:

HumanAbility recommends using high-quality sector-specific data sources—such as Department of Health and Aged Care's (DOHAC) Aged Care Workforce Census, NDS workforce data, and Ability First data—to ensure greater alignment between occupation classifications and the realities of care and support workforces.

This approach would enable more accurate and timely classification updates and reduce misclassification of emerging or blended roles. It would also help prioritise key occupations—such as NDIS navigators, service coordinators, brokerage workers, and employment support roles—which are often underrepresented or poorly defined in current classifications.

Examples of opportunities for further refinement include:

- The Aged Care Workforce Census, which provides rich detail on workforce composition and demand that is not currently reflected in broader ABS data, leading to mismatches between policy assumptions and actual workforce needs. Similarly, as mentioned earlier, in the disability sector, roles like Auslan interpreters and Disability Employment Consultants remain poorly captured, despite their strategic importance to the sector's growth and inclusivity.
- There is also an opportunity to review potential gaps in the data—particularly around the clarity of descriptors and the visibility of secondary or casual employment. Using available training and employment data, for instance, HLTAID011 (Provide First Aid) is consistently one of the top ten units of competency by enrolment.⁷ Despite this, JSA's data placemat (2023) reports only 980 First Aid Trainers (ANZSCO 451815 / OSCA 461933), as reflected in the ABS Census, even though hundreds of RTOs offer this training. First Aid Trainers are critical to maintaining compliance and safety across the care and support sector, so it is important to understand this workforce.

Finally, HumanAbility notes the importance of prioritising highly feminised sectors—as raised in our response to Question 8. Improving the visibility and accuracy of classifications in these sectors is essential to ensure that gendered roles are appropriately captured, valued, and supported through workforce planning, policy, and investment.

Economic and productivity prioritisation

Demand for, and provision of, quality care is increasingly recognised as a megatrend reshaping Australian society and the economy. This shift brings with it both a social imperative and a strategic economic opportunity. The care and support sector is not only essential infrastructure—it is also a major driver of employment, workforce participation, and long-term productivity⁸.

⁷ Australian Vocational Education and Training Statistics, Total students and courses 2023, National Centre for Vocational Education Research (NCVER), page 22.
https://www.ncver.edu.au/data/assets/pdf_file/0050/9689477/Total-VET-students-and-courses-2023_v3.pdf, accessed 26 March 2025.

⁸ Department of Prime Minister and Cabinet (May 2023) *Draft National Strategy for the Care and Support Economy Strategy*, <https://www.pmc.gov.au/resources/draft-national-strategy-care-and-support-economy>, accessed 21 March, 2025.

Recommendations and further suggestions:

HumanAbility further recommends the care and support sector be given increased weighting within economic and productivity prioritisation criteria, recognising its role as essential social infrastructure and its contribution to labour force participation, particularly for women.

While we acknowledge the importance of productivity and economic impact criteria, we recommend expanding these to include social infrastructure returns—for example, the economic value created through increased participation of informal carers and women in the workforce.

Investments in the care and support sector need to be weighted accordingly, as they deliver long-term economic and social benefits.⁹ The “*Shaping Our Future*” national strategy highlights how investment in the early childhood education and care workforce leads to improved educational and developmental outcomes, greater social mobility, and increased female labour market participation.¹⁰

The care and support sector employs approximately 1.7 million people,¹¹ with over 76% of the workforce being women.¹² It is one of Australia’s fastest-growing industries and a key enabler of broader economic activity across sectors.

According to the *Draft National Strategy for the Care and Support Economy*, this sector’s growth is essential to meet rising demand for care services and support economic prosperity.¹³

Prioritisation frameworks should reflect not only traditional economic outputs, but also how investment in care and support drives productivity and underpins a more inclusive, resilient economy.

⁹ Ibid.

¹⁰ Department of Education, (September 2021) *Shaping Our Future: A ten-year strategy to ensure a sustainable, high-quality children’s education and care workforce 2022-2031*

<https://www.acecqa.gov.au/sites/default/files/2021-10/ShapingOurFutureChildrensEducationandCareNationalWorkforceStrategy-September2021.pdf>, ACEQA Website, accessed

¹¹ Australian Bureau of Statistics (11 October 2022), Media Release *A Caring Nation* [A caring nation – 15 per cent of Australia’s workforce in Health Care and Social Assistance industry](#), ABS Website, accessed 14 March 2025.

¹² Jobs Skills Australia (2024) *Industry profiles, health care and social assistance profile* <https://www.jobsandskills.gov.au/data/occupation-and-industry-profiles/industries/health-care-and-social-assistance>, JSA Website, accessed 20 March 2025

¹³ Department of Prime Minister and Cabinet (May 2023) *Draft National Strategy for the Care and Support Economy Strategy 2023: Care and Support Economy Taskforce*. <https://www.pmc.gov.au/sites/default/files/resource/download/draft-national-care-and-support-economy-strategy-2023.pdf> DPC Website, accessed 17 March 2025.

Do you have any other comments about the OSCA maintenance strategy? (Question 14)

Recommendations and further suggestions:

Workforce classification changes must continue to reflect the roles and employment **pathways of Aboriginal and Torres Strait Islander workers in the care and support sectors**. OSCA updates have already made some important improvements—such as the split of *Aboriginal and Torres Strait Islander Health Worker* (ANZSCO 411511) into two distinct roles: *Health Practitioner* and *Health Worker*.

It is critical that future updates continue to support visibility of occupations within **community-controlled organisations**, recognising their unique workforce structures and qualifications. Updates must be designed to avoid inadvertently disadvantaging Indigenous-led service delivery models.

This includes engaging with First Nations peoples and communities during consultation and review phases to ensure that culturally specific occupational contexts are reflected in the classification system.

This could include recognising and appropriately classifying a range of culturally identified roles—such as *First Nations Mental Health Worker*, *First Nations Drug and Alcohol Worker*, *Family Support Worker*, and *Disability Support Worker*. These roles not only require the core competencies of the occupation, but also demand strong cultural competence. They often include “First Nations” or “Aboriginal and Torres Strait Islander” in the title and may be designated as identified positions.

Although OSCA is a classification system, it should still be responsive to culturally sensitive data collected by agencies like the ABS to ensure accurate representation of First Nations occupations and skills. This matters because roles such as cultural knowledge holders and Indigenous language workers—which may be included under ‘interpreters’ or not included at all—are vital in sectors like health, care, and recreation, yet risk being excluded or misrepresented if not appropriately classified. Rather than grouping such roles under generic or ‘not elsewhere classified’ categories, OSCA could support inclusion by refining descriptors and creating space for culturally specific occupations. As such, OSCA’s maintenance processes should ensure meaningful engagement with First Nations people during all relevant phases.