Submission to the Generative AI Capacity Study of Jobs and Skills Australia

HumanAbility

16 May 2025

HumanAbility

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, 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.

Table of Contents

HumanAbility

Executive Summary

The care and support sector within HumanAbility's remit—including aged care, disability, children's education and care, health, human (community) services and sport and recreation sectors —is one of Australia's largest and fastest-growing workforces. While not traditionally considered digitally intensive, the sector is beginning to integrate generative AI in ways that support, rather than replace, human expertise, with early adoption most prominent in the health care sector [reference].

HumanAbility's submission underscores three key priorities for the Generative AI Capacity Study:

- **Relevance and risk**: AI's indirect impacts—through documentation, triage, and systems analysis—are likely to reshape roles without automating them. If deployed without input from frontline sectors, AI may increase workforce risk, entrench inequity, and fail to address persistent workforce shortages.
- **Opportunity and attraction**: AI can help reclaim meaningful work by reducing administrative burden and enhancing relational care and support, which could improve job satisfaction, reduce burnout, and support workforce retention—critical in sectors experiencing high attrition.
- **Inclusion and capability building**: Effective AI integration requires role-specific, ethically grounded training that supports diverse cohorts, including Aboriginal and Torres Strait Islander workers, people with disability, culturally and linguistically diverse (CALD) workers, and those in trusted relational roles such as peer support and lived experience positions.

Finally, this submission highlights the importance of giving adequate weight to care and support sectors in this study and ensuring recommendations are shaped through sector-led, co-designed approaches that reflect real-world service contexts.

Submission

Introduction:

Generative Artificial Intelligence (AI) is expected to influence all sectors of the economy—but its impacts in human-centred roles will be distinct. In care and support sectors, AI is more likely to augment than automate work, with implications for training, service design, and workforce sustainability. This submission from HumanAbility seeks to ensure that implications for human-centred sectors are not overlooked, and that workforce and training strategies account for the specific characteristics and needs of care- and support-focused industries. These include the relational nature of work, the importance of ethical and safe service delivery, and the persistent workforce shortages that define these sectors.

Sector Context and Stakeholder Priorities

Stakeholder Insights

1. Our stakeholders are aware of, and responding to, the shifts brought about by Artificial Intelligence. Its implications intersect with the broader workforce challenges facing the care and support sectors. AI has surfaced in discussions during HumanAbility's state and territory forums, as well as through broader engagement during research and functional analysis for training package reviews. Some stakeholders have highlighted AI as both a challenge and an opportunity; however, most have not identified it as a current priority. This likely reflects the emerging nature of AI in the care and support sectors, as well as stakeholder focus on more immediate and persistent issues raised with HumanAbility including:
    a) Workforce shortages,
    b) Skills gaps,
    c) Limited career pathways,
    d) Ensuring training remains contemporary and fit for purpose,
    e) Supporting diverse and inclusive workforces,
    f) Strengthening the evidence base and addressing data gaps; and
    g) Ensuring policy and regulatory settings enable sustainable workforce development.[1]
2. These priorities align with the three streams of the Generative AI Capacity Study of Jobs and Skills Australia (JSA).
3. Peak bodies such as the Western Australian Council of Social Service (WACOSS) have highlighted the need for inclusive digital literacy, targeted community-based training, and support to build capability for ethical and effective AI use in service delivery. These insights reinforce the relevance of contextualised workforce development approaches.[2]
4. Some sectors within HumanAbility's remit are adopting AI in ways that support workforce capability – such as Health and Sport. For example, Royal Life Saving Australia, has highlighted opportunities for AI-enhanced

[1] HumanAbility (2024) *Workforce Plan* https://humanability.com.au/projects/humanability-2024-workforce-plan.aspx Accessed 14 April 2025
[2] Western Australian Council of Social Services (2024), *Submission to the Select Committee of Adopting Artificial Intelligence (AI), 31 May,* https://www.wacoss.org.au/wp-content/uploads/2024/08/WACOSS-Submission-Select-Committee-on-adopting-AI.pdf Accessed 15 April 2025

drowning detection systems[3], and Swimming Australia is exploring the use of generative AI to enhance roles like coaching by translating complex performance data into actionable insights. This example highlights how digital skills and AI literacy can support workforce capability without displacing human expertise and presence.[4] It reinforces the need to ensure AI applications in people-centred sectors augment rather than displace relational roles that require judgement and discretionary decision making.

Labour Market and Workforce Impacts

Workforce disruption, transition and augmentation

5. Generative AI is expected to disrupt some sectors more than others, particularly roles involving routine tasks or structured decision-making. Human-centred roles in care and support are less exposed to automation, but still likely to be reshaped as AI augments tasks such as documentation, triage, diagnosis and diagnostics, reporting, communication and quality assurance.[5] Transition strategies should support both workers displaced from other sectors including by supporting them to move into the care and support sector should they choose, where significant workforce shortages exist. Strategies should also support those already in care roles to adapt and upskill.

6. When ethically implemented, generative AI offers opportunities to reduce workload pressure, improve decision-making, and enable earlier intervention. For example, in aged care, child protection and family violence contexts, AI could detect patterns across case data such as trends in falls, individualised escalating risk patterns, or 'frequent flyers' in a service system and prompt timely evidence-based responses.[6]

7. More broadly, AI may help identify systemic issues, enabling targeted responses and allowing skilled practitioners to focus on direct care rather than administration.

8. To ensure alignment with frontline realities, policy, system design, and training investments should involve direct input from the care and support sectors. Without this, AI related training risks overlooking the relational nature of care and support sector work and could further entrench current workforce shortages. As

---

[3] Royal Life Saving Australia (2024), article *Advancing Aquatic Safety: AI-enhanced drowning detection,* RLS, https://www.royallifesaving.com.au/about/news-and-updates/news/2024/oct/ai-enhanced-drowning-detection-systems#:~:text=These%20AI%20drowning%20detection%20systems,enabling%20them%20to%20intervene%20swiftly , Accessed 5 May, 2025.

[4] Amazon Web Services, article *Swimming Australian uses data and machine learning on AWS to enhance Athlete Performance,* https://aws.amazon.com/solutions/case-studies/generative-ai-swimming-australia/ Accessed 15 April 2025.

[5] Lane, M. (2024), "Who will be the workers most affected by AI?: A closer look at the impact of AI on women, low-skilled workers and other groups", OECD Artificial Intelligence Papers, No. 26, OECD Publishing, Paris, https://doi.org/10.1787/14dc6f89-en; Parliament of Australia, Select Committee on Adopting Artificial Intelligence (AI), (2024) *Final Report, November* Accessed 14 April 2025 https://parlinfo.aph.gov.au/parlInfo/download/committees/reportsen/RB000470/toc_pdf/SelectCommitteeonAdoptingArtificialIntelligence(AI).pdf Accessed 15 April 2025

[6] Save the Children (2023) *Harnessing artificial intelligence for child protection: An ethical roadmap*, Save the Children https://www.savethechildren.net/blog/harnessing-artificial-intelligence-child-protection-ethical-roadmap Accessed 29 May 2025 ; Aged Care Insite (2025) *AI project to address over-prescribing in aged care,* Aged Care Insite, https://www.agedcareinsite.com.au/2025/04/ai-project-to-address-over-prescribing-in-aged-care/ Accessed 1 May 2025 ; Orygen (2024) *New study reveals Australians turning to AI for mental health support,* Orygen, https://www.orygen.org.au/About/News-And-Events/2024/New-study-reveals-Australians-turning-to-AI-for-me Accessed 1 May 2025.

one of the largest and fastest growing sectors,[7] it is essential these sectors can access, understand, and see the relevance of AI to their roles and systems.

9. There is a risk that early adopter may begin using generative AI for documentation, case notes, and assessments without sufficient training or safeguards. In high-stakes settings like nursing or family violence, inappropriate use of sensitive information or flawed AI generated content could lead to serious and detrimental client outcomes.

10. Given the scale of the care and support workforce, and the distinct nature of human-centred work, the risks of poorly implemented AI, it is essential that the JSA Study gives adequate weight to these sectors. Any recommendations for future policy, training, or system design should explicitly include direct consultation and co-design with the health, human services, disability, aged care, sport and recreation and early childhood sectors to ensure relevance, inclusion, and impact.

AI as a tool to reclaim meaningful work and increase attraction and retention

11. The sector consistently tells us that workers enter the care and support sector for its relational and human centred nature—supporting older people, people with disability, helping secure housing, and educating children. However, rising administrative burden has become a source of dissatisfaction, as it reduces the time available for the person-centred work, they value most.[8]

12. Thoughtfully implemented generative AI, could alleviate this burden by streamlining administrative tasks[9] and freeing up time for direct engagement. This has the potential to improve job satisfaction, reduce burnout, and retain skilled workers. For example, an NDIS workforce survey[10] specifically found that administrative burden was a significant factor in engagement and burnout; and an Aged Care Workforce report found a top motivator to work in the sector was client interaction.[11]

13. In a sector experiencing workforce shortages, AI may help reduce workload intensity, retaining existing staff by reducing the factors that drive attrition such as administrative load. Over time, this can help build a more experienced and resilient workforce, and in turn strengthening the workforce available for mentoring, leadership development, and continuity of care—improving both client outcomes and system sustainability.

---

[7] Jobs and Skills Australia (2024) Employment Projections May 2024-May 2034. Available at https://www.jobsandskills.gov.au/data/employment-projections. Accessed 24 April 2025

[8] Royal Commission into Aged Care Quality and Safety, 2021. Final report: Care, Dignity and Respect. Available at: https://www.royalcommission.gov.au/aged-care/final-report ; The Sector (2021) *ACECQA shares findings from National Workforce Strategy Survey as recruiting challenges persist,* Available at https://thesector.com.au/2021/07/26/acecqa-shares-findings-from-national-workforce-strategy-as-recruiting-challenges-persist, Accessed on 15 April 2025.
Education NSW (2024) *The Childcare and Economic Opportunity Fund Survey Results.* Available at https://education.nsw.gov.au/early-childhood-education/engagement-and-insights/insights/the-childcare-and-economic-opportunity-fund-have-your-say-survey Accessed 24 April 2025

[9] National Disability Practitioners (2024) *AI now: using AI in Care Settings*, NDP, https://www.ndp.org.au/learning-hub/workshops/ai-now-using-ai-in-care-settings Accessed 2 May 2025.

[10] Prime Minister and Cabinet, Australian Government (2022) NDIS workforce retention, Findings form the NDIS workforce survey. Available at: https://behaviouraleconomics.pmc.gov.au/sites/default/files/projects/ndis-workforce-retention-survey.pdf Accessed 23 April 2025.

[11] Department of Health and Aged Care (2024) Aged Care Worker Survey 2024 Report. Available at https://www.health.gov.au/sites/default/files/2024-12/aged-care-worker-survey-2024-report.pdf Accessed 24 April 2025.

Skills System Implications

Building workforce capability – role specific training

14. Preparing the workforce for AI integration requires access to role-specific and service-specific training that builds confidence, reinforces ethical practice, sound judgement, and interpersonal strengths. Training must go beyond basic digital literacy to reflect real service contexts and maintain professional standards. Rather than adding new units, AI and digital competency should be embedded in VET through revised companion volumes, strategic use of electives, strengthened digital foundation skills, targeted upskilling micro-credentials, and professional development for trainers to support implementation.

15. Without structured training and governance, frontline workers—particularly early adopters—may use generative AI tools to support documentation, case notes, client assessments, or court reports without understanding the privacy, safety, or ethical implications. While such tools can offer significant efficiency gains, improper use in high-stakes environments with vulnerable cohorts such as children, people with disability or families experiencing violence could lead to poor decisions or serious harm. Workers must be supported to audit both inputs and outputs, understand the tools' boundaries, and receive training to integrate them responsibly within established professional standards.

16. Training providers must design content that is grounded in real-world application and ethical frameworks. Without this, adoption may be uneven or inappropriate and frontline workers may disengage.

17. Role-specific digital capability may include using AI-enabled tools to support communication, manage documentation safely, and apply data privacy and consent principles, while preserving the relational and ethical foundations of care work.

18. Foundational capability must be complemented by sector-specific application and leadership—an area where cross-JSC collaboration may be valuable to ensure ethical AI use in relation work contexts.

Equity and Inclusion

Priority cohorts

19. Generative AI presents both risks and opportunities for workers and vocational education and training learners who are already underrepresented across parts of the care economy. This includes Aboriginal and Torres Strait Islander peoples, people with disability, those from culturally and linguistically diverse backgrounds, and others who may face barriers related to language, literacy, digital access, or systemic exclusion. Without inclusive design and implementation, AI could widen equity gaps in both employment and education.

Sector roles to support transition

20. People already working in, or training for, care-related roles may face compounding disadvantage if AI tools are not accessible or supported by tailored implementation. Trusted roles—such as allied health assistants, peer support workers, lived experience roles, and Aboriginal health support workers—could in help clients and service users navigate AI-enabled environments. These roles should receive targeted training that builds digital confidence while reinforcing existing strengths in trust-building, communication, and advocacy.

21. For example, People with Disability Australia (PWDA), highlighted in a submission,[12] the risks AI poses for people with disability, particularly in low-paid, low-skill roles. They called for inclusive digital skills programs to enable participation, co-designed training and employment transition supports. They raised barriers such as inaccessible platforms, inadequate accommodations and emphasised the need for human rights principles to underpin AI deployment and avoid reinforcing ableism. The Generative AI Study should actively consider these concerns to ensure that AI adoption supports accessibility, workforce participation, and culturally-safe service and training across the care economy.

22. These equity considerations reinforce the importance of co-designed, inclusive training approaches to close the digital divide and build confidence across diverse roles and learners.

Policy alignment and cross-sector collaboration

National initiatives

23. Significant work on AI and workforce change is already underway across government and industry, offering a strong foundation to guide national training and workforce planning. Key examples include:

    a) The *Policy for responsible use of AI in government,*[13]emphasises human oversight in decision making and highlights the need to build workforce capability in safe and ethical AI use, including through upskilling the public sector, many of which are in the care economy.

    b) The Senate Select Committee on Adopting Artificial Intelligence,[14] includes a full chapter on the impacts of AI on industry and workers, including specific reference to the health care sector.

    c) The *National Policy Roadmap for AI in Health Care*,[15] reflects broad consultation with over 180 organisations, and 30 peak bodies, offering clear insights into capability needs and risks.

    d) A recent sports innovation report[16] highlights convergence between health, fitness, wellbeing, and education. It identifies AI and digital trends, such as wearable technology, performance analytics, and smart facilities. It calls for improved workforce capability in digital literacy, data skills, and inter-disciplinary training, alongside stronger collaboration between government, industry, and education providers.

---

[12] Connor, S., (4 October, 2024) *AI For All – An Equitable Regulatory Framework for Australia - Submission to the Department of Industry, Science and Resources on Safe and Responsible AI in Australia*, People with Disability Australia, Sydney https://pwd.org.au/ai-for-all-an-equitable-regulatory-framework-for-australia/ Accessed 14 April 2025

[13] Australian Government, Digital Transformation Agency (2024) *Policy for the responsible use of AI in government, Version 1.1 September, https://www.digital.gov.au/sites/default/files/documents/2024-08/Policy%20for%20the%20responsible%20use%20of%20AI%20in%20government%20v1.1.pdf* Accessed 23 April 2025

[14] Parliament of Australia, Select Committee on Adopting Artificial Intelligence (AI), (2024) *Final Report, chapter 4 https://parlinfo.aph.gov.au/parlInfo/download/committees/reportsen/RB000470/toc_pdf/SelectCommitteeonAdoptingArtificialIntelligence(AI).pdf* Accessed 24 April 2025

[15] Australian Alliance for Artificial Intelligence in Health Care (November, 2023) *National Policy Roadmap for Artificial Intelligence in Health Care, November, https://www.mq.edu.au/__data/assets/pdf_file/0005/1281758/AAAiH_NationalAgendaRoadmap_20231122.pdf* Accessed 24 April 2025

[16] Australian Sports Technologies Network (2023) *Analysis of Australia's thriving sports tech sector with spotlight on industry insights and major trends* ATSN Sports Innovation Report, Second Edition.

Partnership opportunities with the Future Skills Organisation

24. The Australian Government Department of Employment and Workplace Relations leads on foundational digital literacy, while the Future Skills Organisation (FSO) is responsible for developing generalist and specialist digital capabilities, including generative AI, across AQF levels 2 to 4. HumanAbility is well placed to contribute to foundational and VET-level AI skill development for care and support roles.

25. We have met with FSO and understand that the units they are designing are adaptable and can be contextualised for sector-specific applications. As the JSC for the care and support sectors, HumanAbility can support FSO in testing the relevance of these units to people-centred roles—across one of the largest, fastest-growing sectors facing acute workforce shortages, and with significant potential for productivity gains and service improvement through AI integration.

26. We will continue to explore opportunities to work with DEWR and FSO to support the integration of AI and digital capabilities into care and support sector training. This could include collaborating with FSO on updates to companion volumes to incorporate examples of how AI is reshaping vocational tasks and suggesting simulated activities that reflect real-world digital practices. We could also work together to identify strategic digital electives that we could include within packaging rules to build AI readiness. In parallel, we are open to working with DEWR to support the design of optional digital foundation micro-credentials, offered alongside Certificate II to Diploma-level qualifications, to help learners build confidence with AI tools, evaluate digital content, and engage with technology safely and ethically across industries.