

To Whom it May Concern,

Thank you for the opportunity to respond to the 2025 Core Skills Occupations List (CSOL) consultation.

HumanAbility, the Jobs and Skills Council for the care economy, has engaged with stakeholders from across our five sectors to inform our response, which builds on our response to the 2024 Core Skills Occupations List consultation.

As the introduction of the CSOL and other initiatives in the Migration Strategy are still relatively new, industry are still adjusting to the changes in parameters and the impact of the changes to their workforce. As such, we particularly appreciate the comprehensive response Jobs and Skills Australia (JSA) provided to stakeholder feedback received on the 2024 CSOL. This has helped to further clarify the parameters to the CSOL and how it is informed.

However, the care and support economy is Australia's largest and fastest-growing industries. It employs around 15% of the total workforce and employment increased by 6% in the last year¹. The Intergenerational Report 2023² and Jobs and Skills Australia (JSA) projections, indicate the sector will need to more than double in size over the next 40 years to meet demand.³ Yet a lack of detailed, accessible and high-quality data continues to hinder the ability of all actors across the sector to make informed decisions, allocate resources efficiently and make improvements across the care and support industries⁴. This is a critical issue HumanAbility highlighted in our 2024

¹ Australian Bureau of Statistics, Labour Force Survey, Detailed, February 2025, Jobs and Skills Australia trend data.; Jobs and Skills Australia, Employment Projections produced by Victoria University, 2024; and Care and Support Economy State of Play, Prime Minister and Cabinet
<https://www.pmc.gov.au/sites/default/files/resource/download/care-support-economy-state-of-play.pdf>

² Commonwealth of Australia (2023) Intergenerational Report 2023, Australia's future to 2063
<https://treasury.gov.au/publication/2023-intergenerational-report>

³ Australian Government (2023) Working Future, The Australian Government's White Paper on Jobs and Opportunities <https://treasury.gov.au/sites/default/files/2023-10/p2023-447996-working-future.pdf> ; and Australian Bureau of Statistics, Labour Force Survey, Detailed, February 2025, Jobs and Skills Australia trend data.; Jobs and Skills Australia, Employment Projections produced by Victoria University, 2024

⁴ HumanAbility (2024) *Workforce Plan 2024*

Workforce Plan⁵, our 2025 Workforce Plan⁶, our submissions to the Occupation Shortage List (OSL)⁷, the 2024 Core Skills Occupations List (CSOL).⁸ It remains a challenge to HumanAbility and our stakeholders in providing a comprehensive response to this consultation.

Of the occupations listed on this year's CSOL 'targeted consultation list' – all are in shortage (whether nationally, regionally or in jurisdictions). All are essential to the delivery of quality care and for the health and wellbeing of Australians. Yet, there is not currently the range of data to adequately reflect this.

While the welcome changes introduced in the OSCA contribute to addressing the data challenges faced by the sectors within our remit, gaps remain. This is for several reasons including but not limited to:

- Defining the workforces is not straightforward due to overlaps across industries (ANZSIC), jobs (ANZSCO) and skills (National Training Register), which has the potential for a sector workforce to be over or understated.
- Counts of the number of delivered services often do not accurately reflect demand or waitlists. This can act as a false base in projecting future demand.
- Workforce censuses provide valuable insights but can be infrequent and the data generated can provide an incomplete picture of workforce numbers, specialisations, qualifications and job roles and functions. This can lead to policymakers and workforce planners making decisions with out-of-date information. This is particularly problematic if workforces are in shortage or operating in sectors undergoing substantial reform.

Given the continued inadequacy of data in these sectors, it is our strong recommendation that all occupations in the targeted consultation list (attachment one) and those proposed to be retained from the 2024 CSOL be on the 2025 CSOL and remain so until the data is more complete. This would avoid any unintended

⁵ HumanAbility (2024) *Workforce Plan 2024*

⁶ HumanAbility (2025) *Workforce Plan 2025*

⁷ HumanAbility (2025) Submission to JSA's proposed 2025 Occupation Shortage List (unpublished)

⁸ HumanAbility (2024) Submission to JSA's draft Core Skills Occupations List
<https://www.humanability.com.au/site/DefaultSite/filesystem/documents/Public%20Submissions/Jobs%20and%20Skills%20Australia%20draft%20Core%20Skills%20Occupation%20List%20Consultation.pdf>

consequences of excessive shortages causing delays in the delivery of care to people who need it.

As JSA is aware, a key function of Jobs and Skills Councils is to engage with and be informed by our stakeholders – unions, industry, government and training providers. For future CSOL consultations we would welcome a longer lead time to respond to this list, which would enable us to engage with our stakeholders in an informed way and provide a more meaningful response to the consultation.

To that end, HumanAbility has requested DEWR for a briefing prior to the end of 2025, with relevant parties from the Department of Immigration and with Jobs and Skills Australia. The purpose of the briefing is to assist HumanAbility and our stakeholders in understanding the range of migration pathways that may be available for occupations across our sectors, the status on progressing the ‘Essential Skills Pathway’ option and to understand where migration pathways may no longer exist for some occupations.

Please don’t hesitate to contact me should you wish to discuss this response further.

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Kind regards

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Attachment one Table 1: Care and Support Occupations on the targeted consultation list (OSCA-coded).

Count	OSCA Code	Occupation Title	Higher Education Level 1-2	Min. VET Qualification Level 3
1.	141331	Aged Care Manager	1	
2.	141334	Paramedic Manager	1	
3.	141335	Welfare Centre Manager	1	
4.	141399	Health and Welfare Service Managers nec#	1	
5.	261131	Counsellor (General)	1	
6.	261231	Psychologist	1	
7.	261931	Arts Therapist	1	
8.	261932	Behaviour Support Practitioner	1	
9.	261933	Music Therapist	1	
10.	261999	Allied Health Counselling, Psychology, Social Work and Creative Therapy Professionals nec#	1	
11.	262231	Exercise Physiologist	1	
12.	262232	Exercise and Sports Scientist	1	
13.	262999	Allied Health Physical and Sensory Therapy Professionals nec#	1	
14.	263933	Diabetes Educator	1	
15.	263999	Allied Health Science Professionals nec#	1	
16.	264335	Geriatrician	1	
17.	264336	Haematologist	1	
18.	264344	Public Health Physician	1	
19.	264345	Respiratory Physician	1	
20.	264399	Physicians nec#	1	
21.	264999	Medical Practitioners nec#	1	
22.	265331	Nursing / Midwifery Unit Manager	1	
23.	265432	Registered Nurse (Acute Care)	1	
24.	265435	Registered Nurse (Primary Health Care)	1	
25.	265499	Registered Nurses nec#	1	
26.	269432	Paramedic	1	
27.	269999	Health Professionals nec#	1	
28.	311299	Medical and Dental Technicians nec#	2	
29.	311331	Community Pharmacy Technician		3
30.	311332	Hospital Pharmacy Technician		3
31.	411131	Child Protection Practitioner	2	
32.	411132	Family Violence Practitioner	2	
33.	411231	Community Development Officer	2	

34.	411232	Community Support Worker	2	
35.	411332	Lifestyle Coordinator		3
36.	411333	Lifestyle Officer		3
37.	411633	Financial Counsellor (Community)	2	
38.	411634	Housing Officer	2	
39.	411635	Refuge Worker		3
40.	411636	Welfare Worker	2	
41.	411731	Residential Youth Worker	2	
42.	411732	Youth Justice Worker	2	
43.	411933	Volunteer Coordinator		3
44.	421131	Aged Care Coordinator		3
45.	421132	Aged Care Team Leader		3
46.	422131	Disability Services Officer	2	
47.	422232	Disability Team Leader		3
48.	441232	Myotherapist	2	
49.	441233	Remedial Massage Therapist	2	
50.	441331	Mental Health Worker	2	
51.	441933	Audiometrist	2	
52.	442131	Allied Health Assistant		3
53.	461132	Dermal Therapist	2	
Children's Education & Care				
54.	431131	Early Childhood Education Room Leader	2	
55.	431132	Early Childhood Educator		3
56.	431231	Family Day Care Coordinator	2	
57.	431232	Family Day Care Educator		3
58.	432131	Inclusion Support Assistant		3
59.	432231	Teaching Assistant		3
Sports and fitness				
60.	462231	Pilates Instructor		3
61.	462399	Sport and Recreation Safety Patrollers nec#		3
62.	462438	Outdoor Adventure Leader or Guide		3
63.	462441	Snowsport Instructor		3
64.	462532	Sports Umpire		3
65.	462599	Sports Officials and Umpires nec#		3
66.	462699	Sportspersons nec#		3