

Submission: 2025 Occupation Shortage List

Vacancy fill rates may indicate no shortage yet modelling and sector evidence point to substantial medium- to long-term shortfalls. Without recognition of this in the Occupation Shortage List (OSL), this risks undermining national workforce strategies, delaying targeted training investment, and weakening migration and retention policies. For occupations with long qualification pipelines and high attrition, the consequence will be service gaps that cannot be closed in time to meet projected demand.

Evidence Supporting Revision of 'No Shortage' Ratings

Registered Nurse (Acute Care, Specialist Streams): The [Nursing Supply and Demand Study 2023–2035](#) projects a national shortfall of more than 70,000 nurses by 2035, requiring almost 80,000 new nurses. The *National Nursing Workforce Strategy*, expected to draw on this study, is due for release in 2025 but has not yet been published.

- Acute Care: A projected undersupply of 26,665 FTE nurses by 2035 (OSCA 26432 – includes specialisations from ANZSCO for Critical Care & Emergency 254415, Perioperative 254423)
- Primary Healthcare: Projected shortage of 21,765 FTE. (OSCA 265435, which includes specialisations from ANZSCO for Child and Family Health 254413, Community health 254414, Disability 254416)
- Mental Health: Shortfall of 1,918 FTE. (OSCA 265434 and ANZSCO 254422)

For all nursing related occupations (including MCH and Mental Health nurses) we have strong stakeholder feedback through our forums and stakeholder engagement of shortages across all nursing occupations.

Additional sources; [ANMJ](#); [Migration Agency](#); [ANMF](#);

Maternal and Child Health Nurses / Child & Family Health Nurse: (ANZSCO 254413 Child and Family Health) The [Victorian MCH Workforce Project Final Report](#) identifies MCH nursing shortages as the most significant recruitment challenge in Victoria. The report's findings, although published in 2023, provide strong rationale for ongoing recognition of shortage status. In some localities, more than 40% of surveyed MCH nurses intended to leave within five years, and some councils were operating at less than 50% of required staff. Recruitment is constrained by the requirement for triple-qualified nurses, a process taking 5-7 years. Given that MCH

nurses also require midwifery qualifications, and RN midwives are recognised as being in shortage, Child and Family Health nurses should also be included on the shortage list. While Victoria has conducted the most comprehensive study, there is some evidence of similar shortages in [NSW](#) , and the issues may be more widespread but has not yet been systematically measured.

Mental Health Nurse: Estimates of additional workforce needs vary significantly. The Nursing Supply and Demand Study projects a requirement for only 1,918 additional mental health nurses, whereas in 2025 the Australian College of Mental Health Nurses estimates a need for 25-30,000 , with current workforce deficits of around 32%. Peak bodies report worsening shortages in acute, rural, and community settings, aligning these with the current mental health crisis and the suite of mental health policies and strategies that will require a dedicated mental health nursing workforce for effective implementation. Sources: [ACMHN statement](#); [RANZCP](#); [Nursing Supply and Demand Study 2023–2035](#).

Child Care Centre Manager & Child Carers (educators): JSA’s own national modelling indicates a need for 39,000 additional ECEC educators by 2026. ACA’s 2022 survey showed over 50% of centres were capping enrolments due to staff shortages, denying families access to care each week. JSA’s [employment projections](#) indicated the need for 13.2% additional Child Care Centre Managers by 2024. While the OSL recognises the shortage of early childhood teachers, there is still a clear need for educators and qualified managers.

Recent government reforms like the introduction of capped childcare fees, free access for some families, and extra subsidised early childhood education hours are increasing enrolments and driving greater demand for childcare services. This growth requires more early childhood educators and support staff, not just teachers. Peak bodies, including the Australian Childcare Alliance, warn that while wage increases are being delivered to attract and retain staff, workforce shortages remain a major challenge as affordable access expands.

Sources: [ACA Survey](#); [ECEC Workforce Capacity Study](#), [PMC](#); [2025-26 Budget](#);

Aboriginal & Torres Strait Islander Education Worker: Aboriginal and Torres Strait Islander educators are essential for culturally responsive, community-connected schooling, yet remain under-represented in the education system. While data specifically on Aboriginal and Torres Strait Islander Education Workers is limited – partly due to small workforce numbers, NACCHO has stressed to HumanAbility, that this is not a reason to exclude these roles from visibility in workforce data, including the OSL. Using available data sources, only 2% of registered teachers identify as First Nations compared to 5.7% of students nationally. Shortages are most acute in

remote areas, where 66% of principals report difficulty filling vacancies across their schools (including education workers), particularly in schools serving Aboriginal communities. Barriers include limited career pathways, qualification hurdles, and high turnover due to professional isolation. While initiatives such as “Growing Our Own” and the NT Remote Aboriginal Teacher Education (RATE) program aim to build the workforce, current measures are insufficient to meet existing and projected demand, leaving a persistent gap that directly impacts educational equity and outcomes for First Nations students.

Sources: [AITSL data](#); [AITSL Spotlight](#)

Optical Dispenser: Industry raised concerns about shortages of optical dispensers in 2022, this was backed up as still being a current concern in 2025 through HumanAbility’s functional analysis. It confirms widespread recruitment challenges for optical dispensers, particularly in regional and remote areas. Employers are increasingly hiring staff without formal qualifications due to shortages, and providing on-the-job training to meet immediate needs.

The functional analysis findings reveal that although employers typically prefer staff to hold the Certificate IV in Optical Dispensing, a shortage of qualified professionals has prompted shifts in recruitment practices. Many employers now recruit individuals with strong retail experience and customer service backgrounds, providing in-house training to build the required technical skills. While this approach helps meet immediate staffing needs, it also raises concerns about inconsistent service quality due to variations in training and skill development” (p.4), and "Employers consistently reported a shortage of skilled entry-level staff who are job ready. There can be targeted training for the entry-level skills gap that might support job readiness in customer service, product handling, and basic lens/frame knowledge." p.37

Sources: [Insight News 2022](#), HumanAbility Functional Analysis 2025

Disability Support Officer: Under current ANZSCO code the role of DSO incorporates providing ‘community access’ to people with disabilities – which is very broad and likely incorporates Disability Support Worker roles funded under NDIS community access and coordination roles. Under OSCA it has been singled out as Disability Support Co-ordination and Local Area Coordination (LACs). NDIA would be well placed to advise on shortages of LACs given they manage this program. Under both the ANZSCO and OSCA definitions, the scope of Disability Services Officers is broad.

The [NDS State of the Disability Sector Report 2024](#) presents clear evidence of workforce shortages specifically affecting intermediary roles and support coordination, classifications distinct from Disability Support Workers. According to data presented, vacancy rates for support

coordinators and intermediary staff remain consistently high. Employers across the sector identify these roles as among the most difficult to recruit and retain, citing factors including higher workloads, stress related to navigating complex NDIS processes, and a growing demand for specialised skills as participants' needs become more complex. The longitudinal nature of the survey demonstrates that these shortages are longstanding and have intensified in recent years, rather than being isolated to one survey period.

Significantly, these shortages are recognised by providers as critical barriers to both participant outcomes and business viability, especially as the sector adjusts to regulatory reforms and changing funding models.

Of note, additional insights will be available from the forthcoming NDS Workforce Census, due for release within the next two weeks. However, at this point, the 2024 Report remains the most up-to-date and authoritative published source on this topic.

Sources: [NDS Workforce Census](#) , [State of the Disability Sector Report 2024](#).

Outdoor Education Leader/Guide: [HumanAbility's functional analysis of the outdoor recreation and leadership](#) sector found that 74% of employers could not recruit sufficiently qualified staff, with persistent shortages compounded by low higher-qualification completions and high workforce attrition. These issues documented through national interviews, surveys, and job analysis demonstrate that the shortage is structural and ongoing, not merely cyclical.

The *Outdoor Census for NSW & ACT* is due to be released by September 2025. HumanAbility has read the draft. It confirms significant and sustained workforce shortages in the NSW and ACT outdoor industry, with overall staff numbers falling from nearly 50,000 in 2023 to just over 42,000 in 2025 a 44% decline since 2019.

Industry state that worker shortfall is the second-largest constraint on organisational growth (after rising operational costs), and demand is most urgent for those with Wilderness First Aid and Certificate IV in Outdoor Leadership.

Unfortunately, attrition is high at around 16% annually, driven by burnout, relocation, study, and casualisation. Shortages affect all sub-sectors of this industry: outdoor education, recreation, adventure tourism, and therapy, with almost 12,000 additional qualified workers needed but unavailable.

Employers identify workforce attraction, retention, visa pathways, and mental health support as critical priorities.

While this data covers only NSW and ACT, HumanAbility's functional analysis was conducted nationally and found similar structural issues across all jurisdictions. On this basis, it is reasonable to expect that comparable shortages exist in other states and territories, even if they have not yet been formally measured by industry peak bodies. Given this alignment of findings across two independent evidence sources, we recommend national recognition of these roles on the OSL, rather than limiting shortage ratings to the jurisdictions currently surveyed.

Dental Assistant: Shortages of dental assistants are a persistent and critical issue, particularly outside metropolitan areas. In a recent meeting, an industry representative covering more than 170 practices nationally sought out HumanAbility to raise concerns about the scale and impact of these shortages. When Dental Assistants were listed on earlier priority occupations lists, subsidised traineeships in many jurisdictions ensued and helped to stabilise supply. Since their removal off the OSL in 2024, shortages have re-emerged, showing up in the organisations workforce data for the NT and regional areas in particular. As such we would support an OSL rating of Regional Shortage for Dental Assistants.

Dentists cannot operate without a Dental Assistants due to regulatory and patient safety requirements. When Dental Assistants are unavailable or untrained, infection control and compliance are at risk, dentists experience greater stress, and patient services are cancelled or relocated. The Australian Dental Association's *Dental Assistant Workforce Challenges* report confirms ongoing difficulty attracting and retaining staff, especially outside metropolitan areas, with even small shortages having disproportionate impacts on service delivery.

Given the criticality of Dental Assistants to maintaining safe and accessible dental services, reinstating them on the OSL would restore pathways, enable subsidised training in more jurisdictions, and help address what is now an shortages.

Sources: [ADA Workforce Challenges](#), HumanAbility stakeholder feedback.

Health and Community Services Sectors

We also have concerns, based on broad engagement with the health and human services sectors, that there are likely national shortages of Social Workers, Drug and Alcohol Counsellors, Family Support Workers, Youth Workers, Community Workers, and Therapy Aides (Allied Health Assistants). Many of these roles provide essential and integrated supports for family services, child protection, mental health and addiction, aged care, disability, homelessness and hospital care. While we do not have current quantitative evidence to confirm this, the breadth of state

and territory strategies and policies targeting these sectors suggests that demand pressures are significant. With targeted investment in surveys or workforce censuses and registration schemes, supported by government or peak bodies these shortages could be more clearly established and monitored.