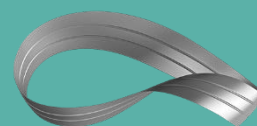


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# DRAFT CORE SKILLS OCCUPATIONS LIST (CSOL) FOR CONSULTATION

ISA SUBMISSION

31 May 2024



INDEPENDENT  
SCHOOLS  
AUSTRALIA

## Acknowledgement of Country

Independent Schools Australia acknowledges the traditional custodians of country throughout Australia and recognises the continuing connection to land, waters and community. We pay respect to Elders past and present, and commit to the ongoing journey of reconciliation.



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## 1. ABOUT ISA

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Independent Schools Australia (ISA) is the national peak body for Independent schooling in Australia. ISA represents the sector on national issues and engages with the Australian Government, national agencies, media, key stakeholders, and the wider Australian community.

Working with the eight state and territory Associations of Independent Schools (AISs), ISA represents 716,800 students, over 1,215 schools and a workforce of 122,000 people.

The latest available data shows that one in six Australian school students attends an Independent school, and for secondary students, it is over one in five.

Students at Independent schools reflect the full diversity of Australian society – including those who experience one or more forms of disadvantage, and there is considerable diversity in the size and location of schools, and the fees they charge.

The latest data shows that the majority of Independent schools charge annual fees of less than \$6,000 per year, and that more schools charge less than \$1,200 per year than \$20,000. Some Independent schools charge no fees at all.

Most families with children enrolled in non-government schools are middle-to-low-income earners, increasingly from culturally diverse backgrounds, and live in outer-suburban and inner-suburban communities. Many of these families are making substantial sacrifices for their children's education.

Many Independent schools provide a religious or values-based education. Others promote a specific educational philosophy or interpretation of mainstream education, and often schools have been established by community groups seeking to meet particular needs or to reflect religious values. Independent Catholic schools are a significant part of the sector, accounting for eight per cent of enrolments.

Most Independent schools are set up and governed independently on an individual school basis. However, some schools with common aims and educational philosophies are governed and administered as systems, such as Lutheran schools. These systemic schools account for 20 per cent of schools in the sector.

Independent schools are long-established partners in Australia's education system, alongside government and Catholic schools. They make a valuable contribution to society and the learning and wellbeing of Australian children.

## 2. INTRODUCTION

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ISA prepared this submission in response to Jobs and Skills Australia release of the Draft Core Skills Occupations List (CSOL) for consultation. ISA consulted with the state and territory Associations of Independent Schools (AISs) in preparing this submission.

### 3. RECOMMENDATIONS

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The Core Skills Occupation List (CSOL) will be integral to schools' ability to recruit and employ overseas principals, teachers and other school staff from overseas. This recruitment is critical for many schools in the face of current teacher shortages and other staff shortages.

- ISA strongly recommends the inclusion of principals, teachers, school support staff and allied health professionals on the CSOL. Inclusion on the CSOL will make it easier for all schools to employ much-needed staff and will also enable schools to recruit teachers for hard-to-staff specialist areas such as science, technology, engineering and mathematics (STEM) and for boarding schools and regional and remote school to recruit teachers and staff to fill workforce shortages.
- ISA also recommends that Jobs and Skills Australia consults with the Independent and Catholic sectors, the non-government sectors of schooling, to ascertain their particular workforce needs and skills shortages.

### 4. INDEPENDENT SCHOOLS AND THE CORE SKILLS OCCUPATION LIST

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Since changes made to skilled migration visas in 2017, ISA and other independent sector bodies have raised concerns about the omission of several school-related occupations from skilled occupation lists associated with longer visa lengths. This change has significantly impacted Independent schools' ability to recruit internationally to fill staffing shortages.

In the intervening years, it has become clear that not only is Australia experiencing a national teacher shortage but there is in fact a global teacher shortage. This means that more needs to be done so that skilled migration can be used effectively, and Australia can attract highly skilled school professionals. Without this change, Australia is at risk of potential school staff choosing to work in other countries.

The 2021 Australian Teacher Workforce Data National Teacher Workforce Characteristics Report notes that seventeen per cent of the total number of teachers employed in the school sector were born overseas. Furthermore, 15% of school leaders in Australia were born overseas.<sup>1</sup> These school staff are a critical component of Australia's school workforce.

In an increasingly globalised context, it is natural that Independent schools would wish to recruit highly skilled principals with international experience and skills. And it is not just teachers that schools need but also other school related professions such as student counsellors, residential care officers and other senior staff.

A 2017 survey undertaken by the Australian Heads of Independent Schools of Australia (AHISA) showed that in addition to school principals, Independent schools extensively used the then 457-visa program to employ a range of staff. These include the following:

- Heads/Directors of Learning or Learning Innovation or Social Emotional learning.
- Business Managers
- Teachers in recognised difficult to staff areas including native speakers for Languages other than English (LOTE) subjects; teachers of mathematics, chemistry, physics, Latin and music; teachers of special education.

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<sup>1</sup> AITSL, "Australian Teacher Workforce Data National Teacher Workforce Characteristics Report," December 2021, [https://www.aitsl.edu.au/docs/default-source/atwd/national-teacher-workforce-char-report.pdf?sfvrsn=9b7fa03c\\_4](https://www.aitsl.edu.au/docs/default-source/atwd/national-teacher-workforce-char-report.pdf?sfvrsn=9b7fa03c_4).

- Staff with experience in international schools
- Leaders of International Baccalaureate (IB) programs (primary, middle years and senior secondary) and teachers in all IB subject areas
- Religious Studies teachers or others with specialist religious qualifications
- Boarding supervisors and Heads of Boarding.<sup>2</sup>

## 5. TEACHER SHORTAGES

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The latest data from the Australian Teacher Workforce Data initiative shows that the teacher workforce growth cannot meet the growing demand of student enrolments. Fewer people are entering the profession and the high proportion of registered teachers aged 50 years and over (38% of all registered teachers) will contribute to future workforce shortages.<sup>3</sup> A 2022 AHISA survey also found that most staff departures were those staff aged 41-50 years old. It is predicted that the demands on the current workforce will continue to increase alongside shortages, placing additional pressure on existing teachers and the broader sector.

The national teacher workforce shortage has been widely discussed at the Jobs and Skills Summit and is a national priority for Education Ministers. A Ministerial Direction was to deliver more efficient visa processing for skilled applicants and their sponsors across industries, particularly those in schools.

According to the 2022 Skills Priority List Key Findings Report, the labour market has tightened for school professionals. The number of suitable applicants for school professionals more than halved between the 2021 and 2022 period and employers had greater difficulty filling vacancies.<sup>4</sup> This includes early childhood teachers, primary school teachers and secondary school teachers.

Staff shortages were also exacerbated by the COVID-19 pandemic and border closures with the pandemic placing significant additional pressures on the sector and the teacher workforce. Many principals and teachers brought forward retirement plans or simply left the profession after COVID.

To address these teacher shortages, we now have the National Teacher Workforce Action Plan (NTWAP) which was agreed to by all Education Ministers in 2022.

“The Action Plan builds on a range of initiatives already underway in jurisdictions, sectors and individual schools. It is the first step of an ongoing strategy to attract more people to the profession and retain more teachers in the workforce”.<sup>5</sup>

Prioritisation of visa processing for skilled visa applications in the education sector to improve teacher supply is part of the NTWAP. The CSOL should match this intent.

### 5.1 Specialist teachers

Employing overseas staff enables Australian Independent schools to increase the range of expertise available. According to AHISA, the most prevalent secondary teacher shortages were in mathematics, physics and chemistry. In 2021, there was a significant increase from 2019 in difficulty recruiting teachers of design & technology, special education, English and religious education (see Table 1).

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<sup>2</sup> AHISA, “Skills Priority List Consultation National Skills Commission 2020,” 2020, [https://www.ahisa.edu.au/AHISA/Advocacy/Submission\\_Resources/Submissions\\_2020/Skills\\_Priority\\_List\\_consultation\\_National\\_Skills\\_Commission.aspx](https://www.ahisa.edu.au/AHISA/Advocacy/Submission_Resources/Submissions_2020/Skills_Priority_List_consultation_National_Skills_Commission.aspx).

<sup>3</sup> AITSL, “Latest Data Reinforce Teacher Workforce Pressures,” AITSL, accessed December 16, 2022, <https://www.aitsl.edu.au/secondary/news-and-media/media-release---latest-data-reinforce-teacher-workforce-pressures>.

<sup>4</sup> Australian Government, National Skills Commission, “2022 Skills Priority List: Key Findings Report,” 2022, <https://www.nationalskillscommission.gov.au/>.

<sup>5</sup> <https://www.education.gov.au/national-teacher-workforce-action-plan>

Furthermore, 92% of respondents indicated that the greatest challenge in recruitment is the shortage in teachers with specialist discipline knowledge.<sup>6</sup>

**Table 1. Hard to staff teaching positions 2019 and 2021, by proportion of respondents selecting each option<sup>7</sup>**

Subject area	2019	2021	% change
Mathematics	67%	67%	0%
Physics	61%	55%	-6%
Design & Technology	33%	42%	9%
Chemistry	36%	34%	-2%
Languages other than English	34%	32%	-2%
Education support/special needs	16%	23%	7%
English	13%	21%	8%
Religious education	4%	20%	16%

## 5.2 Regional and remote schools

In 2020, 23% of overseas trained teachers worked in regional or remote areas. This was a decrease of 5% since 2018.<sup>8</sup> One third of Independent schools are located outside of metropolitan area and the attraction and retention of teachers in 'difficult to staff' regional and remote locations is a critical issue for these schools.

The Independent school sector is quite different to the larger systemic government and Catholic sectors as Independent schools have the sole responsibility for hiring suitable and experienced staff. They are not able to encourage staff within a large system to take up positions in schools in non-metropolitan areas or to move staff to address specific shortages. Attracting overseas teachers and staff is one way that regional schools can fill critical staffing shortages.

## 6. OTHER SCHOOL STAFF

Schools are not only experiencing teacher shortages but also shortages of other skilled school staff in a range of key areas.

### 6.1 Boarding schools

The Independent school sector is by far the largest provider of boarding schools for Australian school students (74% of the total number of boarding schools). Independent boarding schools sometimes must look overseas for staff who have strong boarding school experience to engage qualified workers. Overseas recruitment is the most common way to address staffing shortfalls of teachers and boarding staff for many of these schools.

<sup>6</sup> AHISA, "Skills Priority List Stakeholder Survey 2022," 2022, [https://www.ahisa.edu.au/AHISA/Advocacy/Submission\\_Resources/Submissions\\_2022/Skills\\_Priority\\_List\\_Stakeholder\\_Survey\\_.aspx](https://www.ahisa.edu.au/AHISA/Advocacy/Submission_Resources/Submissions_2022/Skills_Priority_List_Stakeholder_Survey_.aspx).

<sup>7</sup> AHISA.

<sup>8</sup> AITSL, "ATWD: Key Metrics Dashboard," AITSL, accessed December 20, 2022, <https://www.aitsl.edu.au/research/australian-teacher-workforce-data/key-metrics-dashboard>.

ISA's 2021 Report, *Independent Boarding – A National Perspective*, which was based in part on extensive discussion with boarding schools, identified attraction, training and retention of boarding school staff as a key workforce issue. The report noted particular challenges with the employment of sufficient supervisors, tutors and specialists as well as attracting high calibre heads of boarding and managing the workload of those staff who often have a teaching load in the school in addition to their boarding leadership role.<sup>9</sup>

## 6.2 Allied health professionals

Student wellbeing and the provision of adjustments for students with disability are significant concerns in Australian schools and it is accompanied by a lack of access to allied health professionals. There is a range of work underway to look at workforce issues in allied health services<sup>10</sup> and inclusion of these occupations on the CSOL must also be a priority.

## 6.3 Early Childhood and Care

Based on data provided by the AISs in 2022, ISA estimates that two thirds of Independent schools provide early childhood services, which overall equates to approximately 790 schools.

Most Independent school providers operate early learning services for 3- to 5-year-olds. Some Independent schools operate both Long Day Care (LDC) and sessional kindergarten/preschool or may have Outside School Hours Care (OSHC) available for both preschool and school aged children.

Australian Bureau of Statistics data shows that in 2022, there were 8,251 children aged 4- and 5 years enrolled at Independent sector preschools. This represented approximately seven per cent of the total number of preschool enrolments across all sectors and almost eleven per cent of the total number of preschool enrolments in the non-government sector.<sup>11</sup>

# 7. DRAFT CORE SKILLS LIST

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ISA supports the inclusion of the occupations list below in the 'Confident on list'.

**Table2: 'Confident On' List**

134311	School Principal
241111	Early Childhood (Pre-primary School) Teacher
241213	Primary School Teacher
241411	Secondary School Teacher
241599	Special Education Teachers nec
272312	Educational Psychologist
272313	Organisational Psychologist
272311	Clinical Psychologist
272399	Psychologists nec
272511	Social Worker

<sup>9</sup> <https://isa.edu.au/documents/independent-boarding-a-national-perspective/>

<sup>10</sup> <https://www.health.gov.au/topics/allied-health/what-we-do>

<sup>11</sup> <https://isa.edu.au/documents/a-path-to-universal-early-childhood-education-and-care-draft-report/>



411716	Youth Worker
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ISA is concerned at the potential exclusion of the following occupations as they are currently listed in the 'Confident Off List'. While teaching staff, many of the occupations below would be employed by non-government schools.

As noted above, many Independent schools also operate Early Childhood and Care services and there are a number of occupations on the 'Confident Off' and 'Targeted for Consultation' lists related to the provision of those services.

Finally, as noted above, student wellbeing is a significant issue in schools and there is a high degree of concern at the lack of allied health professionals in all contexts – metro, regional and remote – for students and schools to access. ISA is concerned that a number of these occupations are included in the 'Confident Off' and 'Targeted for Consultation' lists.

**Table 3: Confident Off' List**

134111	Child Care Centre Manager
134412	Regional Education Manager
224611	Librarian
249111	Education Adviser
249311	Teacher of English to Speakers of Other Languages
272211	Minister of Religion
272613	Welfare Worker
311414	School Laboratory Technician
313199	ICT Support Technicians nec
411711	Community Worker
411712	Disabilities Services Officer
423411	Child or Youth Residential Care Assistant

ISA is concerned about the potential exclusion of the following occupations as they are currently listed in the 'Targeted for Consultation' list and ISA would support their inclusion in the CSOL. The range of occupations relating to the educational needs of students with disability is particularly concerning to the sector, especially in the context of the recent Disability Royal Commission and Review of the NDIS.

**Table 4: 'Targeted for Consultation' list**

134411	Faculty Head
134499	Education Managers nec
139913	Laboratory Manager
241311	Middle School Teacher \ Intermediate School Teacher

241511	Special Needs Teacher
241512	Teacher of the Hearing Impaired
241513	Teacher of the Sight Impaired
242211	Vocational Education Teacher \ Polytechnic Teacher
249112	Education Reviewer
272115	Student Counsellor
421111	Child Care Worker
421114	Out of School Hours Care Worker

## 8. CONCLUSION

ISA strongly urges Jobs and Skills Australia to consider the concerns raised in this paper regarding the inclusion of specific occupations in the CSOL.

The Core Skills Occupation List (CSOL) will be integral to schools' ability to recruit and employ overseas principals, teachers and other school staff from overseas. This recruitment is critical for many schools in the face of current teacher shortages and other staff shortages.

— ISA strongly recommends the inclusion of principals, teachers, school support staff and allied health professionals on the CSOL. Inclusion on the CSOL will make it easier for all schools to employ much-needed staff and will also enable schools to recruit teachers for hard-to-staff specialist areas such as science, technology, engineering and mathematics (STEM) and for boarding schools and regional and remote schools to recruit teachers and staff to fill workforce shortages.

— ISA also recommends that Jobs and Skills Australia consults with the Independent and Catholic sectors, the non-government sectors of schooling, to ascertain their workforce needs and skills shortages.

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