

20 October 2017

By online form: <https://www.employment.gov.au/skilled-migration-occupation-lists-consultation>

**Re: Methodology for the 2017 review of the Skilled Migration Occupation List**

The Australian Dental Association (ADA) welcomes the opportunity to provide comment on the Department of Employment (DoE)'s Consultation Paper about the methodology for Migration Occupation Lists (MOL) (Consultation Paper):

**1. Are there additional labour market factors, for which there are national datasets available (ideally aligned to 6-digit ANZSCO occupation level), that are relevant to future refinements to the Department's analysis and methodology? What is the frequency of data release? [Max 1,500 characters]**

While the Consultation Paper appropriately refers to the Department of Health (DoH) workforce projections as an example of robust and reliable evidence (page 4), the ADA would like to specifically suggest the DoE use the DoH National Health Workforce Dataset (Dataset), which provides a comprehensive source of demographics of health practitioners, by registration, and employment status. The Dataset draws from the Australian Health Practitioner Regulation Agency (AHPRA), in conjunction with the national boards, which covers 14 nationally registered health professions and is updated yearly. Health practitioner registration boards, such as the Dental Board of Australia (DBA), also release registration data quarterly.

The Consultation Paper refers to the use of "Graduate Outcomes Data and Field of Education Occupation Destination data". Graduate Outcomes data is problematic as this survey has a low response rate, particularly when considering each profession and course. Similarly, with respect to vacancy data from the DoE, dentist jobs are not often advertised in the manner of many other occupations, and so their usefulness in illustrating the number of vacancies in this sector will be limited. The ADA recommends that the DoE obtain data on the number of dental students undertaking study across the Vocational Education and Training and higher education sectors to obtain data on the prospective influence on future labour supply, including the proportion of domestic and international students.

**2. The Department is also seeking submissions on suitable datasets that are disaggregated by region. Please provide details if you are aware of such a dataset, including whether it is aligned to ANZSCO occupations and how often the dataset is updated. [Max 1,500 characters]**

The DoH also provides a workforce planning tool that can be used to undertake health workforce supply and demand projections by each state and territory to identify potential gaps and oversupply in Australia's health workforce at local and national levels. Please note health practitioner registration data from the Australian Health Practitioner Regulation Agency and the health boards (such as the DBA) also provide data by state.

**3. Is there any other advice or evidence that the Department should consider in its review of the methodology? We are particularly looking for research, surveys or modelling that is Australian based, recent and aligned to ANZSCO occupations. [Max 3,000 characters]**

The ADA urges the MOL methodology ensure that it not only takes into account the latest sets of research, surveys and modelling, but also draws upon reports that may not be as current (in terms of publication date), but nonetheless contain comprehensive and applicable data and analysis. Such reports can also be used to cross validate other data.

For example, dentists in Australia are experiencing a persistent and continuing oversupply in the labour market. Health Workforce Australia's (HWA) report "Oral Health Workforce 2025" was based on broad consultation, closely

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examining who is providing dental services and the type of dental services provided in both public and private sectors. HWA applied seven alternative workforce planning projection scenarios, including increasing the demand for services; increasing productivity; and reducing both migration and university graduate numbers. All scenarios presented the same result: supply of the dentist workforce is projected to exceed demand. Considering that the report included forecasts up until 2025, its findings are still relevant to the DoE's updates to the MOL. The report provides useful insight and analysis into the supply and demand projections for all dental practitioners, specialists and allied dental personnel.

The ADA urges peak bodies representing occupations subject to possible changes in status on the MOL be consulted so that any additional workforce data and surveys of the profession are properly taken into account in the DoE's recommendations to Ministers. For example, the ADA regularly conducts a dental practice and workforce survey every two years, which also measures the level of actual hours worked and additional hours that are currently available to meet demand. The ADA represents the majority of Australia's 15,000 registered dentists as well as dentist students so would be able to provide helpful and credible information.

**4. Do you have any supporting material for your submission?\***

The ADA will attach to this submission the HWA report "Oral Health Workforce 2025".

Should you require further ADA comment, please contact Damian Mitsch at [ceo@ada.org.au](mailto:ceo@ada.org.au) or 02 9906 4412.

Yours sincerely



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President