



Jobs and Skills Australia
CoreSkillsList@jobsandskills.gov.au

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AIMS and PPA Submission for the Draft Core Skills Occupations List (CSOL) for Consultation

To whom It may concern,

Thank you for the opportunity to provide feedback on the Draft Core Skills Occupations List (CSOL). The Australian Institute of Medical and Clinical Scientists and Public Pathology Australia believe that it is necessary to continue to include Medical Laboratory Scientist and Medical Laboratory Technician positions on the CSOL.

The **Australian Institute of Medical and Clinical Scientists (AIMS)** is the peak multi-disciplinary body in Australia for the medical laboratory sciences and is open to all professions including and not limited to medical laboratory scientists, pathologists, laboratory technicians and also pathology collectors. AIMS has a minimum standards document that sets out the requirements necessary for profession-entry-level medical scientists. This document is utilised across AIMS university program accreditation and for overseas qualification assessments.

AIMS is recognised as the assessing authority for people seeking immigration to Australia for the following occupations:

- Medical Laboratory Scientist (MLS) ANZSCO 234611
- Medical Laboratory Scientist ANZSCO 234611 Specialisation: IVF Embryologist
- Medical Laboratory Technician (MLT) ANZSCO 311213

Public Pathology Australia (PPA) is the peak body for public pathology services across Australia. PPA has 17 members across all jurisdictions in Australia. PPA members provide the vast majority of pathology services in Australia's public hospitals, service a number of private hospitals and operate community based collection services for patients. In addition to providing critical diagnostic pathology services, PPA members also provide clinical services, teaching, training, research and stewardship of the public health system. PPA members are a major employer of Medical Laboratory Scientists (MLS) and Medical Laboratory Technicians (MLT) in Australia.

Current Skills Assessment Status

The number of applications received for skills assessments for migration has increased over the past five years see figures below (Ref AIMS Annual Reports):

Occupation	2019-2020	2020-2021	2021-2022	2022-23	2023-2024 (as of 28 May 2024)
Total Skills Assessments completed	343	390	355	448	512 (200 on-shore and 312 off-shore applicants)
ANZSCO MLS 234611					90
ANZSCO MLT 311213					396
ANZSCO 234611 IVF specialisation	3	5	1	5	0

AIMS Skills Assessment Process

Applicants for skills assessment who have completed an AIMS accredited degree are assessed as Medical Laboratory Scientist (ANZSCO 234611) and are eligible for Graduate membership of AIMS. Applicants without an AIMS accredited degree but with subjects that meet the requirements of an acceptable science degree that is equivalent to at least an AQF level 7 qualification, along with a minimum of 2 years' postgraduate work experience are initially assessed as a Medical Laboratory Technician (ANZSCO 311213) and eligible to sit the AIMS Professional examination. On passing that exam they are then eligible for the occupational group of Medical Laboratory Scientist (ANZSCO 234611). The AIMS professional examination is intended to ensure that individuals who pass the exam can demonstrate comparable level of knowledge and understanding of the profession as graduates from AIMS accredited programs.

Applicants who do not meet the requirement of an acceptable science degree but who have a qualification in Medical Laboratory Science at least at an AQF level 5 and with a minimum of 2 years' postgraduate experience are assessed as Medical Laboratory Technician (ANZSCO 311213).

Reason for Increased Demand in the Profession

There is increased demand for experienced and skilled migrants across the MLS and MLT profession to support the pathology workforce. Workforce demand is driven by increasing pathology activity due to many factors including ageing of the population, the rise in chronic disease, consumer expectations and technological developments such as personalised medicine. The ability to meet this demand is impacted by an ageing pathology workforce with retirement high over the past five years and those in practice leaving the workforce due to pressures on the industry post COVID. This was evidenced in the 2023 Victorian Department of Health Pathology Workforce review which revealed an increased demand for another 71 scientists (21% increase) to support workload across Victoria

alone and 5 – 9% scientists intending to retire in the next 2 to 5 years. (Ref RCPA Victorian Department Health Pathology Workforce Review March 2023).

Pathology services currently have varying reliance on skilled migration. One PPA member reported 40% of MLS and 50% MLT positions are filled via skilled migration. Other services rely on skilled migration sporadically or only for senior scientist positions. Skilled migration is also relied upon for MLS and MLT recruitment in some regional areas of Australia.

Public pathology services report current vacancy rates of up to 4% for MLS and MLT despite active recruitment to vacant positions. While the average age of the profession is 39 years, the percentage of the workforce over 60 years of age is 7-15% for MLS and MLT.

Pathology services across Australia will need additional MLS and MLT staff over the next five years. A PPA member has predicted that their jurisdiction alone would need an additional 50 MLS and 60 MLT during this time, across metropolitan and regional areas.

According to the Occupation Projection data from the ABS (Australian Bureau of Statistics) - Medical Laboratory Scientists (MLS) in November 2021 there were 25,700 MLS in Australia and in November 2026 this was projected to be 28,400 a 5.6% increase in workforce. The breakdown of MLS employed in pathology services from this data source is around 45.6% or 11,719 MLS. (Source: Jobs and Skills Australia Employment Projections to 2026).

AIMS University Accreditation – Bachelor and Masters programs

AIMS provides university accreditation for courses offering directed Bachelor and Master degree programs around Australia in medical science, medical laboratory science and laboratory medicine. Graduates of these programs are classified as Medical Laboratory Scientist (ANZSCO 234611) for those wishing to apply for migration to Australia under the General Skilled Migration visa categories. There are currently 14 accredited Bachelor programs and four accredited Masters programs in Australia and most of them have a cohort of international and domestic students. This mix varies from university to university around Australia.

Removal of MLS from the skilled migration list could adversely impact on pathology courses at universities, as the viability of some courses are dependent on international students. A survey of AIMS accredited universities showed that the accredited courses are a pathway for bridging visa and residency for international students. If MLS and MLT were removed from the CSOL the number of international students would decrease significantly into their programs (Bachelor programs decrease by 25% and Master programs by 55%- see table below). This reduction of international students would impact on the courses being financially sustainable in some regions (Tasmania, Darwin and Melbourne). This could impact in the future the availability of the programs for domestic students, significantly reducing graduate numbers into the profession.

Due to the high quality and medical laboratory discipline specific content of AIMS accredited university programs along with the professional practise placement component anecdotal evidence indicates that 90% of graduates gain employment within three months of graduation and the other

10% go onto further study. Several AIMS accredited universities indicated that the local pathology networks rely on their graduates to sustain their workforce and provide profession ready scientists. Whilst graduates from AIMS accredited programs make up the majority of scientists working in pathology, graduates from other programs also work in the pathology profession in very specialised disciplines or as technicians or technical officers. Pathology laboratories taking on graduates from non-AIMS accredited programs would result in an increased training burden on a workforce already under pressure.

The current graduate numbers supplied by AIMS accredited university programs (Table below data acquired from Annual AIMS Accredited Program reports) does not currently meet the increased demand across the profession in Australia. Hence for sustainability of the profession there is a requirement for both overseas skilled migration and international students staying in Australia after completing their studies.

	Graduates 2021	Graduates 2022	Graduates 2023
Bachelor – Domestic Students	122	159	171
Bachelor –International Students	36	56	54
Master – Domestic Students	84	45	68
Master – International Students	71	39	85
Total	313	299	378

AIMS and PPA strongly recommends that you ensure the **two occupations ANZSCO 234611 Medical Laboratory Scientist and ANZSCO 311213 Medical Laboratory Technician are not removed** from the Core Skills Occupations List. This is to ensure a sustainable and appropriately qualified workforce for the future.

We welcome the opportunity to provide further feedback.

Yours sincerely,



Australian Institute of Medical and Clinical Scientists



Public Pathology Australia

