
D Survey of occupation-registration authorities

D.1 Introduction

Assessment of the use of mutual recognition in terms of occupational registration is hampered by a lack of data. While some regulators' annual reports present data on registration, including the use of mutual recognition, there is no regular, comprehensive data collection.

In order to help gauge the importance and effectiveness of mutual recognition arrangements for occupational registration, the Commission conducted a survey of registration authorities in August 2008.

This survey gathered information about:

- the number of people using mutual recognition as a means of obtaining registration (compared to those obtaining registration conventionally)
- the extent to which conditions are imposed upon those registering via mutual recognition
- the number of applications for mutual recognition that are rejected
- applicants' level of awareness about mutual recognition.

In addition, the survey provided an opportunity for authorities that process mutual recognition applications to express their opinion on the functioning of the schemes.

Survey population

The survey targeted authorities responsible for registration, that is, 'the licensing, approval, admission, certification (including by way of practising certificates), or any form of authorisation, of a person required by or under legislation for carrying on an occupation' (*Mutual Recognition Act 1992* (Cwlth), s. 4).

The list of relevant authorities in each jurisdiction was constructed on the basis of advice from representatives of the Cross-Jurisdictional Review Forum (CJRF), and

other sources such as the 1995-96 Office of Regulation Review Survey of Registration Agencies (ORR 1997). Representatives of the CJRF also distributed the survey instrument at the request of the Commission (box D.1).¹

Box D.1 Administering the survey

The survey was distributed to occupation-registration authorities via email. With the exception of New South Wales, representatives of the Cross-Jurisdictional Review Forum distributed the survey to individual authorities, referring participants to the Commission if they needed help with completing the survey. Participants were initially given approximately four weeks to complete the survey. At the end of that period, they were sent a reminder email, and given an additional week to submit their responses.

Survey participants were given the options of:

- completing an Excel spreadsheet and returning the survey by email
- printing a document and returning the survey by post.

A copy of the survey form can be viewed at the Commission website: www.pc.gov.au/projects/study/mutualrecognition.

Centralised information about occupation regulators appears to be limited in some jurisdictions. While some jurisdictions had a list of authorities readily available, others constructed a list at the request of the Commission. An active register of authorities responsible for occupation registration would assist, for example:

- initiatives to develop and maintain regulator expertise (chapter 11)
- communication between regulators and central agencies (for example, regarding developments in the mutual recognition schemes and relevant findings from legal proceedings)
- studies of aspects of regulators' work.

Caveats regarding survey data

It is important to note a number of caveats regarding the survey data presented in this report.

First, the population of authorities surveyed should be regarded as only broadly representative of occupation-registration authorities in Australia and New Zealand. An exhaustive list of authorities was not available at the time of the survey.

¹ The CJRF representatives distributed the survey to major registration agencies within New South Wales, and the Commission emailed surveys to other agencies within New South Wales.

Second, while the response rate among registration authorities approached to participate in the survey was just over 50 per cent, some authorities responsible for the registration of a large number of workers were unable to provide any data. For example, the Office of Fair Trading was unable to provide information about the number of people working in building, electrical, air conditioning and refrigeration, and plumbing occupations in New South Wales. Therefore, while over 50 per cent of agencies approached responded to the survey, the total number of registrations they reported for some occupations probably represents less than half of total annual registrations in those occupations across Australia and New Zealand.

Third, a number of survey responses were incomplete, meaning that the response rate for each question was not always above 50 per cent. For example, for around 10 per cent of registered occupations for which data on new registrations were supplied, regulators were unable to detail the number of new registrations granted under mutual recognition. Further, information on the number of interjurisdictional registrations conducted outside of mutual recognition was provided for only 42 per cent of occupation registration schemes for which any data were received.

Fourth, the quality of data from some regulators is open to question, an observation also made by Allen Consulting Group in a recent report that included a survey of registration authorities (ACG 2008).

D.2 Survey responses

A total of 115 responses from different registration authorities were received, providing registration data for 362 separate occupation-registration schemes.

A survey response rate of approximately 53 per cent was achieved.² Two factors complicated calculation of this rate.

First, the lack of a definitive list of registration authorities responsible for occupations in which mutual recognition applies meant that surveys were distributed to a number of authorities for whom the survey was not relevant. The number of different organisations to which the survey was distributed by both CJRF representatives and the Commission was used as the denominator in calculating the survey response rate. If authorities for which the survey was not applicable were excluded from the calculation, the response rate might have been higher.

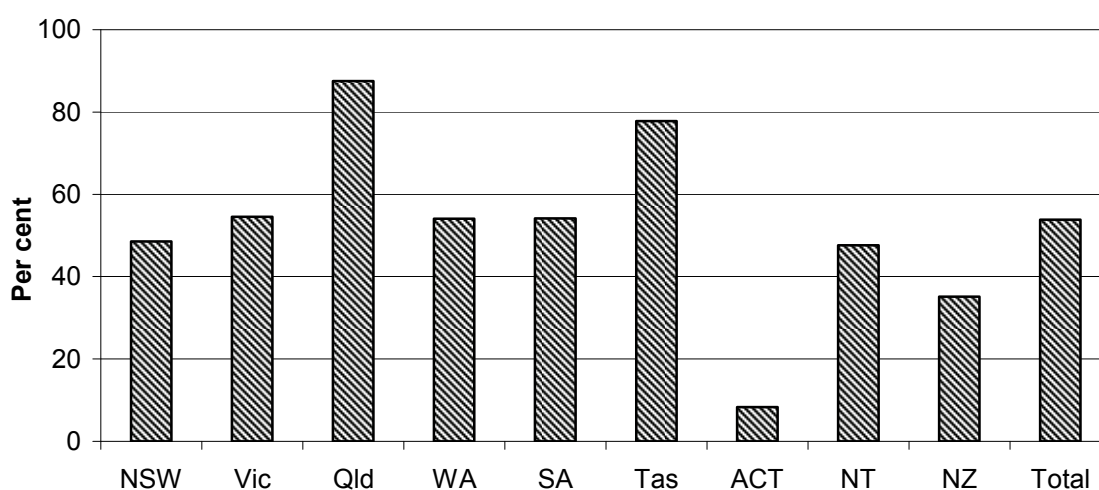
Second, survey responses that combined the responses of a number of authorities that were initially contacted were also received. For example, the Queensland Office of Health Practitioner Registration Boards returned a single survey form

² This response rate does not include any 'responses' returned devoid of data.

containing information for a range of registration boards that were individually included in the initial survey population. In calculating the response rate for the survey, this was counted as a valid response for each of the registration boards included in the initial distribution.

Response rates and the amount of detail provided in responses varied across occupations and jurisdictions. In particular, health registration data appear to be both readily available and suitably detailed, with responses covering occupations in this area received from all jurisdictions. Authorities in Queensland returned 19 separate responses, covering over 70 registration schemes. In contrast, only one out of twelve surveys was returned by authorities in the ACT. The variation in response rates by jurisdiction is presented in figure D.1.

Figure D.1 Response rates — survey of occupation-registration authorities
Per cent, by jurisdiction



Source: Productivity Commission survey of occupation-registration authorities.

Additional survey responses that are received before 12 December 2008, when submissions commenting on the draft report close, will be incorporated into data presented in the final report.

D.3 Results

Number of new registrations

The total number of new registrations in the 2007 calendar year, as reported in the survey responses, is shown by jurisdiction in table D.1, and by occupational group

in table D.2. These tables include the total number of new registrations, new registrations under mutual recognition, and new registrations of people coming from other jurisdictions but that were not made under mutual recognition.

Registration authorities reported over 17 000 uses of mutual recognition as a means of occupation registration in 2007. Around 38 per cent of the mutual recognition registrations were recorded in Queensland, although this figure is inflated due to the high response rate and superior data quality from that jurisdiction. A similarly high level of mutual recognition registrations is observed in health-related occupations, although it is less evident whether or not this is due to superior data quality or higher use of mutual recognition.

Table D.1 New registrations from other jurisdictions, by jurisdiction, 2007^a
Number of registrations

<i>Jurisdiction</i>	<i>Registrations from other jurisdictions</i>		<i>Total registrations</i>
	<i>Mutual recognition</i>	<i>Not under mutual recognition</i>	
NSW	2 658	1 391	88 641
Vic	2 033	79	19 621
Qld	6 548	3 179	43 894
WA	484	281	10 529
SA	989	103	11 694
Tas	880	173	2 009
ACT	345	46	526
NT	3 137	213	7 255
New Zealand	248	1 531	9 502
Total	17 322	6 996	193 671

^a Data presented are the sum of all registrations reported for each group, regardless of whether an answer was provided for all registration categories. That is, the total number of registrations includes responses from registration schemes for which the number of registrations from another jurisdiction was not received.

Source: Productivity Commission survey of occupation-registration authorities.

Table D.2 New registrations from other jurisdictions, by occupation group, 2007^a

Number of registrations

<i>Occupation group</i>	<i>Registrations from other jurisdictions</i>		<i>Total registrations</i>
	<i>Mutual recognition</i>	<i>Not under mutual recognition</i>	
Building occupations	1 352	81	20 380
Dangerous goods licences	44	10	1 328
Finance occupations	0	6	13
Gambling and racing occupations	80	57	7 774
Health occupations	12 403	5 725	39 730
Loadshifting and industrial equipment operator occupations ^b	0	0	63 284
Mining occupations	8	4	26
Motor vehicle occupations	17	0	4 482
Real estate occupations	1 095	0	17 278
Transport occupations	93	3	1 283
Other	2 230	1 110	38 093
Total	17 322	6 996	193 671

^a Data presented are the sum of all registrations reported for each group, regardless of whether an answer was provided for all registration categories. That is, the total number of registrations includes responses from registration schemes for which numbers of registrations from other jurisdictions were not received. ^b Two registration authorities provided information about these occupations. One authority reported zero registrations from other jurisdictions, the other reported that the information was not available.

Source: Productivity Commission survey of occupation-registration authorities.

Importance of mutual recognition

The use of mutual recognition as a means of occupation registration relative to the total number of registrations provides an indicator of the importance of mutual recognition. Table D.3 shows the number of registrations from other jurisdictions as a proportion of total registrations for each jurisdiction, suggesting that mutual recognition may be of greater importance for the smaller jurisdictions. The proportions presented in this table are different from those implied by table D.1, because complete information on registrations from other jurisdictions was not available for all registration schemes.³ For example, the number of mutual recognition registrations was unavailable for a number of schemes that did provide the total number of registrations.

³ In calculating each of the percentages in table D.3, only those schemes that provided data for both the relevant denominator and numerator were used. This was because the number of mutual recognition registrations was unavailable for a number of schemes that did provide the total number of registrations.

Table D.3 **New registrations from other jurisdictions as a proportion of total registrations, by jurisdiction, 2007**

Per cent

<i>Jurisdiction</i>	<i>Mutual recognition^a</i>	<i>Mutual recognition from New Zealand^a</i>	<i>Registrations from another jurisdiction, not under mutual recognition^a</i>	<i>Ratio of mutual recognition to non-mutual recognition^b</i>
NSW	12.7	0.7	1.9	1.5
Vic	11.1	1.8	1.4	7.9
Qld	14.9	1.2	13.4	1.8
WA	8.5	0.5	8.8	1.9
SA	8.5	0.4	2.7	1.6
Tas	42.8	1.3	8.4	5.1
ACT	65.6	–	8.7	7.5
NT	49.6	1.5	3.4	14.7
New Zealand	2.6	na	43.4	0.1
Total	14.5	0.9	5.7	1.9

^a For these columns, the total number of registrations is the sum of new registrations for those registration schemes that provided valid data for both the numerator and denominator. ^b The ratio of mutual recognition registrations to registrations from another jurisdiction that were not under mutual recognition, for registration schemes that provided numerical information for both items. **na** Not applicable. – No data.

Source: Productivity Commission survey of occupation-registration authorities.

Table D.4 demonstrates the importance of mutual recognition for registrations in different occupation groups. Mutual recognition appears to be most widely used in occupations for which higher levels of interjurisdictional registration were reported generally. For example, mutual recognition registrations represent around 30 per cent of total registrations across health registration schemes that were able to provide both the number of mutual recognition and total registrations. Similarly, non-mutual recognition interjurisdictional registrations comprised around 16 per cent of all registrations for these schemes.

The use of conditions for registration under mutual recognition

The survey asked registration authorities to provide information on whether or not they impose conditions on the licences of people registering via mutual recognition in order to achieve equivalence. Of the registration schemes for which data on the number of new registrants in 2007 were provided, around 12 per cent involved the imposition of conditions on registration. Nearly half of those schemes related to the registration of health occupations, and around a quarter were related to building occupations.

Table D.4 New registrations from other jurisdictions as a proportion of total registrations, by occupation group, 2007

Per cent

<i>Occupation group</i>	<i>Mutual recognition^a</i>	<i>Mutual recognition from New Zealand^a</i>	<i>Registrations from another jurisdiction, not under mutual recognition^a</i>	<i>Ratio of mutual recognition to non-mutual recognition^b</i>
Building occupations	9.3	0.6	1.3	10.2
Dangerous goods licences	6.4	0.4	4.7	1.0
Finance occupations	0.0	0.0	46.2	0.0
Gambling and racing occupations	1.0	0.0	0.8	1.4
Health occupations	31.2	3.3	16.7	2.0
Loadshifting and industrial equipment operator occupations ^c	0.0	0.0	0.0	0.0
Mining occupations	30.8	0.0	15.4	2.0
Motor vehicle occupations	1.3	0.5	0.0	0.0
Real estate occupations	6.4	0.5	0.0	0.0
Transport occupations	8.2	0.4	0.7	27.3
Other	6.1	1.5	10.0	0.7
Total	14.5	0.9	5.7	1.9

^a In these columns, the number of total registrations is the sum of new registrations for those registration schemes that provided valid data for both the numerator and denominator. ^b The ratio of the sum of mutual recognition registrations to the sum of non-mutual recognition registrations, for registration schemes that provided information for both the numerator and denominator. ^c Two registration authorities provided information about these occupations. One authority reported zero registrations from other jurisdictions, the other reported that the information was not available.

Source: Productivity Commission survey of occupation-registration authorities.

Of the schemes that reported imposing conditions, registrations where conditions are used comprised about 23 per cent of all mutual recognition registrations (table D.5).

Use of conditions is significant in building occupations where, for those schemes that reported the use of conditions, around 67 per cent of mutual recognition registrations involved the use of conditions to achieve equivalence. In the context of *all* reported mutual recognition registrations for building occupations — including those registration schemes that did not report the conditions — around 36 per cent of registrations involved conditions.

Table D.5 Use of conditions to achieve equivalence, by occupation group, 2007

<i>Occupation group</i>	<i>Registrations on which conditions imposed</i>	<i>Mutual recognition registrations in schemes imposing conditions</i>	<i>Percentage of mutual recognition registrations with conditions imposed^a</i>
	No	No	%
Building occupations	487	726	67.1
Dangerous goods licences	9	9	100.0
Health occupations	339	3175	10.7
Mining occupations	2	8	25.0
Real estate occupations	34	423	8.0
Transport occupations	6	81	7.4
Other	474	1436	33.0
Total	1351	5858	23.1

^a Only those registration schemes that provided numerical evidence about the use of conditions are included.

Source: Productivity Commission survey of occupation-registration authorities.

Rejections of applications under mutual recognition

Information about the number of registration applications under mutual recognition that were rejected was also requested. Valid responses to this question were received for about 80 per cent of the registration schemes for which data were provided.

Rejection of applications made under mutual recognition was not a common occurrence. In all, nine schemes rejected a total of 37 mutual recognition applications in 2007, with 15 and 12 of these in building and health occupations, respectively.

Commonly cited reasons for rejecting applications under mutual recognition included:

- lack of an equivalent occupation
- criminal convictions
- incorrect declarations made on the application form
- failure to meet recent practice requirements.

The finding that rejection of mutual recognition applications is not particularly common is consistent with the idea that workers often contact agencies prior to seeking registration under mutual recognition, and those who are not eligible then do not tend to proceed. For example, in its response, the Victorian Institute of

Teaching pointed out that, while it had not rejected many applications under mutual recognition in 2007, 28 applicants failed to complete the process.

Awareness of mutual recognition

Survey respondents' opinions on awareness about mutual recognition were sought. Occupation-registration authorities largely believed applicants to be aware of mutual recognition. Regarding applicants from other jurisdictions, registration authorities indicated that:

- around 29 per cent were very aware of mutual recognition
- around 65 per cent were somewhat aware
- about 6 per cent were not aware.