THE LAW SOCIETY
OF NEW SOUTH WALES

Our ref: HRC:CBsb030323

3 March 2023

Dr James Popple
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Law Council of Australia
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By email: matthew.wood@lawcouncil.asn.au

Dear Dr Popple,

Consultation on Skilled Migration Reform

The Law Society appreciates the opportunity to contribute to the Law Council's development of policy positions on skilled migration reform and its submission to the inquiry by the Joint Standing Committee on Migration into the role of permanent migration in nation building. The Law Society's Human Rights Committee has contributed to this submission.

We have set out our responses to the questions posed in Attachment A below.

Employment Nomination Visa Framework

Skilled occupation lists

1. *If skilled occupation lists are consolidated or abolished, what occupation or role specific criteria should determine whether a person can be granted a permanent Employer Nomination Scheme (Subclass 186) visa (ENS visa) visa in the Temporary Residence Transition (TRT) and Direct Entry streams? For example, should it be limited:*

   (a) by occupation? If so—how? Should the Australian and New Zealand Standard Classification of Occupations (ANZSCO) codes be used for all applicants? If so, which ANZSCO skill levels should apply?

   (b) by salary? If so, what amount? Should there be any exceptions?

The Law Society would welcome broader consultation with relevant occupation groups to ascertain whether the ANZSCO codes are still relevant for all occupations, or if there are other, more effective tools that could be used to assess applicants and reflect industry needs. In the experience of our members, there are instances where highly skilled people are prevented from making an application, as their occupation is not on the list. For example, the ANZSCO codes do not contain Information Technology Specialist or Computer Hardware Specialist/Analyst in the Medium and Long-term Strategic Skills List.

It must be recognised that at a time of rapid technological advancement, new jobs are continually being created and the skillset required for particular jobs may be subject to

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change. In light of this, we encourage regular review of the ANZSCO codes to ensure they remain up-to-date, thereby facilitating access to migration programs for skilled workers and addressing skill shortages, particularly in areas of new and emerging technologies.

We suggest that, as part of such a review, consideration be given to whether relevant skills assessment authorities are approaching the assessment of the qualifications and employment of prospective visa applicants in a manner that is reasonable and consistent with domestic industry standards.

2. *Should a different approach to skilled occupation lists be taken in relation to a Temporary—Skilled Employer Sponsored Regional (Provisional) (subclass 494) visa— that is, is there still utility in maintaining an occupation list specific to regional visas?*

The Law Society agrees with the Law Council's position, expressed in its submission to the Migration Review, that skilled occupation lists should be consolidated. In their current state, they are difficult to navigate and fail to adequately address labour market needs.

It is possible that the abolishment of an occupation list specific to regional visas would be beneficial, given the significant job shortages in these areas. Such an approach may even contribute to the revitalisation of regional Australia by incentivising more businesses to relocate to regional areas, as the policies in place will meet the skill and labour needs of their businesses.

Requirements related to the nominated position

3. *Please provide any views on the Australian Government's commitment to raise [the Temporary Skilled Migration Income Threshold] TSMIT—e.g. factors or risks to consider or address, including whether the TSMIT should be different for the Subclass 494 visa as compared to the TSS visa.*

The Law Society notes the outcome of the Jobs and Skills Summit to raise the TSMIT following 'broad engagement on equitably setting the threshold and pathway for adjustment'.[1] We agree that a review of the TSMIT is long overdue, given it has not been reviewed since 2013. However, we retain some concerns that a significant increase in the TSMIT may prevent small to medium businesses from sponsoring overseas skilled workers. Further, there may be some classes of occupation, for example in the hospitality or retail industries, where the average market salary rate does not meet the TSMIT.

We refer the Law Council to the analysis by Brendan Coates and Tyler Reysenbach of the Grattan Institute, which proposes a so-called 'goldilocks' threshold of $70,000. It suggests that a TSMIT that is too low is not fit-for-purpose for a skilled migration program and may expose lower-wage migrants to exploitation. By contrast, a TSMIT that is too high would exclude younger skilled workers starting out their careers on lower-than-average wages as well as large segments of other skilled workers, for example those in the healthcare and education industries.[2] Further, as noted by the Human Rights Law Centre and the Migrant Workers Centre, increasing the TSMIT above market rate may result in reliance by employers on temporary workers (e.g., student visa holders and undocumented workers) that are particularly vulnerable to exploitation.[3]

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[1] Australian Government, *Jobs and Skills Summit September 2022 – Outcomes* 4 (Outcomes Document, September 2022) <https://treasury.gov.au/sites/default/files/inline-files/Jobs-and-Skills-Summit-Outcomes-Document.pdf>.

[2] Brendan Coates and Tyler Reysenbach (Grattan Institute), 'The Goldilocks wage threshold for temporary skilled migrants' (Blog Post, 20 November 2022) <https://grattan.edu.au/news/the-goldilocks-wage-threshold-for-temporary-skilled-migrants/>

[3] Human Rights Law Centre and Migrant Workers Centre, 'Putting Migrant Workers First Joint submission to the comprehensive review of Australia's migration system' (Submission, December

We support the position previously advocated by the Law Council that a separate income threshold be determined for regional locations or the TSMIT be abolished. Research should be undertaken to determine the market salary rate by occupation/position in different regional locations.

4. *What changes, if any, should be made to the position requirements for nominations of ENS visa applicants in the TRT and Direct Entry streams? For example, should the requirement that a person be employed in the position for two years be maintained?*

The stipulation of a minimum time in a role creates a power imbalance between employer and employee which can give rise to workplace exploitation. For example, an employee may accept additional duties for the same pay or feel compelled to tolerate workplace bullying.

The Law Society considers that if the two-year period is to be maintained, it is necessary to provide the possibility to work for less than two years in exceptional circumstances, such as those described above.

English Language Requirements

5. *What changes, if any, should be made to the English language requirements of TSS visas, the subclass 494 visa, or ENS visas in the TRT and Direct Entry streams?*

The Law Society agrees with the proposal of the Law Council that the English language requirement for regional visas, including the subclass 494 visa, be set to vocational English.

We note that the current English language requirements demand competency in four linguistic areas, namely speaking, reading, writing and listening. This can present an obstacle for people who may have good spoken English but struggle with written skills. It would therefore be useful to rethink ways in which the English language requirement could take such variations in linguistic ability into account. English language skill requirements can vary significantly between different occupations (e.g. journalist as opposed to hairdresser) and this variation should be considered when setting language requirements.

Age requirement

6. *What changes, if any, should be made to the age requirements for ENS visas in the Direct Entry and [Temporary Resident Transition] TRT streams? Should the Law Council's previous suggested exemptions to the age requirements for ENS visas in the Direct Entry and TRT streams be maintained, with any changes or additions? Should the same apply to subclass 494 visas?*

The Law Society agrees with the proposal of the Law Council that the following circumstances would be appropriate to amend or extend the age requirements:

- all occupations where the business can successfully demonstrate that the nominee is of 'exceptional benefit' to Australia;
- senior management roles, which in some professions tend to correlate with lengthy work experience; and
- in regional areas by allowing for an exceptional benefit exemption if the State/Territory body so endorses.

2022)<https://static1.squarespace.com/static/580025f66b8f5b2dabbe4291/t/63a3d91601a57933d35a88be/1671682327278/2022-12-15+HRLC+MWC+Submission.pdf >

We consider that in addition to noting the contribution that older, highly qualified applicants can bring in terms of their wealth of experience and skills, a further reason for extending the age requirements is the longer working lives of most workers in Australia.

Relevant employment history requirements

7. *Do you recommend any changes to the respective requirements that an applicant for:*

    a) *[Temporary Skills Shortage] TSS visa in the Short-term stream or Medium-term stream must have worked in the nominated occupation or a related field for at least two years;*

    b) *a subclass 494 visa or an ENS visa in the Direct Entry stream must have been employed in the occupation for at least three years on a full-time basis and at the level of skill required for the occupation?*

We do not recommend any changes to the requirements listed above.

Requirements relating to visas held and relationship with nominating employer

8. *What changes should be made to the visa holder and employer history requirements of the TRT stream of the ENS visa? Specifically:*

    a) *Should the requirement to have held a TSS visa for three of the last four years be reduced, for example to two years?*

    b) *What should the employment history requirements of an applicant for the TRT stream be? For example, should they be required to have worked for a specific employer for a period or in a specific or related occupation for a period or either or neither? Why or why not?*

    c) *Specifically: should an applicant for an ENS visa in the TRT stream need to be sponsored by the same employer that is sponsoring the TSS visa they hold at time of application? Why or why not?*

The Law Society agrees with the Law Council that the requirement for a TSS visa-holder to be employed with their sponsoring employer should be reduced from three to two years.

We echo the concerns of the Law Council that the fact that TSS visa holders' right to stay in Australia is dependent on their employment makes them a particularly vulnerable cohort. This has been described by some stakeholders as an 'indentured requirement to work for their original sponsoring employer'.[4] Others have argued that a single-employer sponsorship model not only allows for the employer to exert a greater level of control over the visa holder but may also disincentivise the employer from providing better job quality to improve workforce attraction and retention.[5] Such situations could also leave TSS visa holders vulnerable to forms of workplace exploitation.

On the other hand, we acknowledge that there may be benefits to requiring a TSS visa holder to stay with their nominated sponsor for some duration of time or, if this is not possible, to have worked in a specific or related occupation. However, there must be some flexibility so that the TSS visa holder can change sponsor if they are experiencing poor or exploitative working conditions.

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[4] Australian Industry (AI) Group, 'Submission to the inquiry: A Migration System for Australia's Future' (15 December 2022). <https://www.aigroup.com.au/globalassets/news/submissions/2022/inquiry_into_migration_system_dec_2022.pdf>

[5] Chris F. Wright and Stephen Clibborn (University of Sydney), 'Submission, Department of Home Affairs Review: A Migration System for Australia's Future' (December 2022) 16.

Labour Agreements

9. *What changes, if any, should be made to the nomination or visa application criteria that apply to labour agreements?*

10. *Do you support the introduction of industry sponsorship of skilled migrants? If so, do you have any comment on considerations relevant to its development and establishment?*

We consider it important that employers who are found not to have complied with Australian employment standards should not be eligible to apply for Labour Agreements into the future.

The Law Society would need more information about how the single-employer sponsorship model would be replaced by an industry sponsorship model, and how this model would differ from current Labour Agreements before lending its support to this change. We refer the Law Council to the submission of Associate Professor Chris F. Wright and Associate Professor Stephen Clibborn (University of Sydney) to the Department of Home Affairs, which sets out what an industry sponsorship model might look like based on two former models, namely Labour Agreements as they operated until the mid-1990s and the Enterprise Migration Agreements (**EMA**) model developed by the federal government in 2012.[6]

However, we are supportive in principle of a sponsorship model which seeks to reduce a migrant workers reliance on an employer and, in turn, the risks of workplace exploitation. Consideration will need to be given to the appropriate conditions for employment, pay and other factors under a new model and whether labour market testing continues to be appropriate.

11. *Do you support the GTES program be retained, either with or without amendments?*

We support the retention of the GTES program. It represents a fast-track system for highly skilled workers, and we consider it would be worthwhile to use the program to encourage better representation for minority groups, for example women in STEM. Whilst we appreciate the view of the Law Council that the GTES agreement is similar to a Labour Agreement, in the experience of our members, it has allowed for some exceptionally qualified people to come to Australia and share their expertise with the local workforce. We consider that it could be opened up to different fields (e.g., renewable energy and cyber policy) to assist with the general shortage of workers and talent in such areas.

Labour market testing

12. *Do you recommend reforms to the [Labour Market Testing] LMT framework. If so, please:*

    (a) outline any proposed reforms to the LMT framework, including to the advertisement process and to the exemptions; and

    (b) indicate whether you support the Law Council's previously proposed reforms

We support the Law Council's previously proposed LMT reforms, including:

- an LMT exemption for all nomination applications in which the nominee is already employed by the sponsor;
- an allowance for labour market testing that is more than four months old where the sponsor can demonstrate that the advertising for the role being nominated has already occurred;
- acceptance of applications not fully documented in order to prevent a lapse of LMT;

[6] Ibid., 16-17.

- if a sponsor provides additional information as to why the redundancy is not relevant to the particular nominated position, this should be sufficient for the Department to accept evidence of prior LMT activity and be satisfied that the labour market has been tested, even though this activity may have been completed before the redundancy of a different role which is also mapped to the same ANZSCO.

In the view of some of our members, it is arguable that in times of low unemployment, LMT should not be mandated at all. This reflects the submission of the Australian Chamber of Commerce and Industry that the effectiveness of LMT is unsupported by evidence and that it creates a high regulatory burden. One suggestion in that submission is to require LMT only of organisations or industry that rely heavily on skilled migration on an ongoing basis.[7]

In addition, we suggest that sponsors should be able to accept job applications via one nominated forum, even though they may advertise on several fora. Since the introduction of LMT on the Workforce Australia website, it is the experience of some business clients with whom our members work that an overwhelming number of applications are being received from individuals who are unsuited to and who even may be uninterested in the role (e.g., these individuals are not returning calls for interviews). It is possible that the Workforce Australia website is used as a forum for some job seekers to meet their quota of job applications without the intention of genuinely seeking employment. This results in a high administrative burden for employers sorting through these applications, which is proving unmanageable for some small businesses, particularly in rural areas.

General Skilled Migration (GSM)

Invitation to apply

13. Do you have any concerns about, or do you suggest any changes to, the operation of the EOI and invitation to apply processes for the permanent GSM visa and subclass 491 visa? In your view, should the EOI and invitation process be authorised by law?

The EOI process requires visa applicants to undergo various assessments to be eligible for an invitation. These assessments can include skills assessments, work experience assessments, English language testing etc. We note that these assessments expire and the EOI also expires two years after lodgement if an applicant does not receive an invitation.

Our members have reported that some of their clients have indicated that they believe this process to be unfair as it requires them to incur high costs for a process that is not guaranteed to result in an outcome before the expiry dates of their various documents.

We suggest that the Department of Home Affairs should consider all documents that were valid at the time of submission of the EOI. This is particularly the case for skills assessments and English language testing where, if applicants were successful the first time, it is unlikely that there will be a negative change after the expiry of the first assessment. After meeting the necessary requirements, retaking a work experience or English language assessment should be left as an option to enable applicants to potentially claim more points if they wish to do so.

We support the proposal for the EOI and invitation process to be authorised by law so as to ensure greater clarity and allow applicants to properly assess their chances of making a successful application.

[7] Australian Chamber of Commerce and Industry, A Migration System for Australia's Future(Submission, December 2022) <https://www.australianchamber.com.au/wp-content/uploads/2023/01/ACCI-Submission-Migration-System-for-Australias-Future.pdf>

Age requirement

14. *Do you recommend changes should be made to the age requirements for the:*

    - *permanent GSM visas and temporary subclass 491 visa (under 45 years at time of invitation); or*
    - *the temporary subclass 485 visa (under 50 years at time of application)?*

    Are the differences that apply to these visas appropriate?

The Department of Home Affairs may consider changes to the age requirements for specific situations, including but not limited to:

- where an applicant is a subclass 457 or 482 visa holder and has been working in the nominated occupation for the nominating employer for at least the last three years, even if they have not been earning as much as the Fair Work High Income Threshold;
- where the applicant has an Australian qualification and entered the workforce prior to the age of 45, even though they may only become eligible for a permanent visa after turning 45. There could be a requirement to show ongoing employment and there may be value in setting a salary limit, but one that is lower than the Fair Work High Income Threshold and potentially higher than the Temporary Skilled Migration Income Threshold.

We also consider it inappropriate that a subclass 485 visa has an age limit of under 50, when most applicants for this visa use it to gain local experience and improve their chances for longer term / permanent skilled visa options. Therefore, an individual who is over 45 but under 50 may not have an incentive to pursue a subclass 485 visa or consider Australian migration options due to limits on future visa options.

English language requirements

15. *What changes, if any, should be made to the English language requirements of permanent GSM visas, the subclass 491 visa and the subclass 485 visa?*

We support the Law Council's recommendation in its 2022-23 Migration Program submission that the English language requirement for regional visas, including the subclass 494 visa, be set to vocational English. In addition, we suggest that there should be the possibility of exemptions where the sponsor or visa applicant can put forward a convincing case to support a lower English language threshold.

Skilled occupation lists

16. *Should there be any limit on the occupations for which a person may lodge an EOI and/or apply for a permanent GSM visa, subclass 491 visa, or temporary subclass 485 visa in the graduate work stream? If so, how should that limit be imposed or provided for? In addressing the subclass 485 visa, the Law Council would be grateful for views on how the suspension of the skilled occupation lists for such visas in 2022– 23 has affected the efficiency with which they have been processed?*

The suspension of the nomination for the subclass 485 in the graduate work stream has led to quicker processing of these visas and reduced costs, as applicants have not had to undergo skills testing. Our members have reported that this change has allowed several of their clients to enter the Australian workforce with greater ease and without the reliance on employer sponsorships. This is particularly true in regional areas where small regional businesses may be hesitant to engage in the migration process due to perceived complexities and the high costs of sponsorship.

Points test

17. *The Law Council seeks views on the following aspects of the points system for permanent GSM and subclass 491 visas:*

    a) *Is the current qualifying score of 65 appropriate?*

    b) *Do you have any issue with the way in which the Minister:*

        i. *bases a decision to issue an invitation on an applicant score; and*

        ii. *states the requisite points in the invitation to apply, noting the decision on that step does not appear to be supported by law?*

    c) *Do you propose any changes to the way that points are allocated to particular attributes and qualifications in Schedule 6D to the Migration Regulations 1994 (Cth)?*

The qualifying points scores for visas (and the points allocated for individual attributes) in the Skilled Stream has traditionally been used by government as a vehicle to attract migrants with desired skills and attributes and to control visa grant numbers. The points scores, therefore, can and should be modified to meet the needs of the economy and to promote nation building.

Unrealistic qualifying scores or invitations issued only for scores significantly higher than the qualifying score have the potential to undermine the integrity of the program and deter highly skilled migrant workers from expressing their interest.

In the experience of our members, it is rare for applicants to receive an invitation with 65 points. While the post-COVID recovery period has seen some individuals receive invitations for 65 points, it is unclear whether this will be an ongoing situation. We therefore consider it could be misleading to suggest to future applicants that a score of 65 may be sufficient to receive an invitation.

State/Territory Nomination

18. *Do you have any comments or concerns with the way the State and Territory nomination process operates for subclass 190 and 491 visas?*

No comment.

Previous visas held

19. *Do you have any comments or concerns about the previous visa requirements for permanent GSM visas or temporary subclass 485 visas?*

In the experience of our members, student visas have usually been processed relatively quickly compared to other visa streams. However, during the pandemic and in the following months, there were extensive delays which left several onshore student visa applicants in limbo when they had applied for a student visa (for example to complete the studies in which they were already enrolled) but the visa application was not finalised before they completed their studies. This cohort was unable to pursue the subclass 485 visa because they were on bridging visas waiting for the student visas for which they applied to be processed.

The visa requirement for a subclass 485 is that the applicant must have completed their studies within six months of applying for that visa. However, this cohort was not allowed to proceed with a subclass 485 application despite meeting the requirements, because the bridging visa was not recognised as the correct visa. This left a lot of people in distress, with some enrolling in further study and incurring more costs in the hope that they would not miss their chance to apply for the subclass 485. Greater clarity on these requirements and

appropriate system updates may need to be implemented to avoid similar situations in the future.

Education requirements

20. Do you have any comments or concerns about the education requirements for subclass 485 visas?

See response to question 19 above.

Regional visas

21. Do you have comments or concerns about the operation of the subclass 191 visa?

The Law Society supports the view that the three-year period be changed to two years on the subclass 491 or 494 visa before the holder is eligible for the subclass 191 permanent visa.

Pathways to permanent residency

22. What reforms do you recommend to improve pathways to permanent residency within the Skilled Program?

Specifically:

a) Do you propose any structural reforms? For example, to improve pathways to permanent residency in the GSM program or for former students and subclass 485 holders? Could a visa akin to the subclass 191 visa be introduced for non-regional visas?

b) Do you propose any reform to the existing visa subclasses, to make it easier for temporary skilled visa holders to qualify for the permanent skilled visas which may be available to them?

We agree with the Law Council that all GSM and ENS visas should have a clear and certain pathway to permanent residence. This is important for Australia's capacity in the future as it is a way to take advantage of the experiences that these skilled workers have acquired in Australia and will help to stymie the vicious cycle of shortages of skilled workers that sometimes occurs.

It is the experience of our members that the most critical issue for Graduate visa holders is the waiting times for their permanent residency to be assessed. During this time, there are limited opportunities for visa holders in the cohort, which leads them to pursue job opportunities for which they are not qualified or overqualified (e.g. ride share driving). We consider that the Law Council should advocate for better pathways for graduates to obtain permanent residency as well as added incentives for employers to hire such graduates.

Skills assessments

23. Do you recommend any reforms to the skills assessment process?

Specifically:

a) Do you support maintaining skills assessments for some or all of the visa subclasses for which they are currently required? If you propose it be ceased, what should it be replaced with?

b) Do you propose any changes to skills assessment processes?

The Law Society agrees with the Law Council's 2018 submission that skills assessment should not be required for:

- TSS applicants who have demonstrated a substantial number of years of work experience in their occupations; and
- ENS Direct Entry stream applicants in certain highly paid occupations.

The assessment processes for some occupations are both lengthy and costly, and there can be a lack of consistency between the approach of different assessing authorities. For this reason, some of our members suggest removal of the mandatory skills assessment for TSS visa programs as the delays in obtaining the assessment can result in loss of talent as applicants either decide not to pursue the opportunity or decide to depart the country.

In addition, the Law Society would support reviewing a proposal of not requiring international graduates to be assessed if they have completed at least one qualification in Australia.

Global Talent Program

24. Do you recommend any reforms to the Global Talent visa? Specifically:

a) Do you recommend any changes to the application process—for example, do you support the continuation of an EOI process and the prescription of any EOI process in law?

b) Do you recommend any changes to the substantive criteria for the visa?

c) Should Ministerial Direction No. 89 be abolished or amended?

d) Should Ministerial Direction No. 100 be amended, particularly in relation to the priority it provides to Global Talent visas?

We agree with the Law Council regarding the complex and sometimes opaque application process for the Global Talent Visa. Given the history of this visa and the fact that places were significantly reduced due to the impact of the COVID-19 pandemic, we consider it timely for the Government to review this visa, particularly as regards the EOI process and the prescription of any EOI process in law.

Resolution of status visa

25. Do you support the Law Council advocating for the introduction of a resolution of status in the circumstances described above or in different circumstances? If so, please indicate whether or not you would produce any different criteria. If not, please explain why, including by addressing any possible risks.

We support the introduction of a resolution of status in the circumstances described in Attachment A. We note that the Law Council identifies a potential risk may be that this could be seen to reward persons who have engaged in unmeritorious appeals. However, consistent with the views of the Law Council, we do not consider this to be a concern given the short period for which it will be offered.

Other temporary work visas – Subclass 400 visa

26. Should the maximum duration of the 400 visa be extended from six months to twelve months?

27. Should transition to a TSS visa be allowed without breaching the genuine temporary entrant requirement?

28. Under immigration policy, subclass 400 visa holders in an occupation classified under ANZSCO 1–3 must be paid at least at the TSMIT and 400 visa holders in an occupation outside ANZSCO 1–3 should be paid at least the Australian minimum wage, which is often less than TSMIT. What should be the appropriate salary

requirement for 400 visa holders? Should the salary requirement be imposed by law rather than policy?

For the reasons identified in Attachment A, we consider the subclass 400 visa should be extended to 12 months. The genuine temporary entrant requirement should be considered for removal from both student and TSS visas to allow proper pathways for visa candidates. We also support 400 visa holders being paid at the appropriate market salary rate whether this be above or under the TSMIT.

Accredited sponsor processes

29. *Do you supporting retaining the accredited sponsor program, either with or without amendments?*

    (a) Should it be imposed by law, rather than policy?

    (b) Do you propose any changes to the criteria and/or benefits accrued?

We support retaining the accredited sponsor program but believe that the assessment criteria should be incorporated into regulation rather than remaining entirely policy based.

One consideration may be whether the accredited status can be changed at the time of a second nomination application under one of the current criteria, rather than at time of renewal of the sponsorship application. This is because renewal only occurs after five years, but a business may meet one of the criteria to become an accredited sponsor before that time.

Thank you for the opportunity to contribute to the Law Council's submission. Questions at first instance may be directed to Sophie Bathurst, Policy Lawyer, at sophie.bathurst@lawsociety.com.au or (02) 9926 0285.

Yours sincerely,

Cassandra Banks
President