



Submission regarding
Draft Best Practice Principles & Standards
for Skilled Migration Assessing Authorities

October 2023

The Ethnic Communities Council of Queensland acknowledges the Aboriginal and Torres Strait Islander peoples of this state and nation. We acknowledge the Traditional Owners of the lands on which we live, learn and work.

We pay our respects to ancestors and Elders past, present and future. We honour Aboriginal and Torres Strait Islander peoples' unique culture and spiritual connection to the land, waters and seas and their contribution to enriching Queensland and Australia's communities.

About the Ethnic Communities Council of Queensland

The Ethnic Communities Council of Queensland (ECCQ) is the peak body representing culturally and linguistically diverse (CALD) communities in Queensland. We have a membership base of over 450 individuals, ethno-specific organisations and multicultural owned businesses. We have been pioneering this work for over 45 years, since 1976.

Our work focuses on strengthening and advocating for the needs of CALD communities throughout Queensland. We do this by building their capacity through the delivery of leadership training, strengthening community associations as well as through the delivery of culturally tailored healthcare programs.

We believe that Australia's systems should allow for every Australian, irrespective of their background, to be able to participate and contribute in all aspects of Australian society. We know that the diversity of our multicultural society is one of Australia's greatest strengths.

For further information on this submission please contact:

Lisa Ward
Chief Executive Officer
07 3844 9166
lisaw@eccq.com.au



Office Address

NICK XYNIAS House, 253 Boundary Street
West End, Queensland 4101
(corner of Granville St)

Postal Address

PO Box 5916, West End,
Queensland 4101

Phone

(07) 3844 9166

Fax

(07) 3846 4453

Email

administration@eccq.com.au

Websites

eccq.com.au
diversicare.com.au
berlascocourt.com

Introduction

Background

The Ethnic Communities Council of Queensland (ECCQ) applauds the initiative of the Australian Government, through the Department of Employment and Workplace Relations (DEWR), to review the skills assessment process for workers seeking to enter Australia under the skilled stream of Australia's Migration Program.

There are well-known issues and deficiencies in the existing system which are hampering the skilled migration process and adversely impacting on Australia's ability to attract professional workers from overseas, including the best and brightest in a given field. Problems with the system are driving intending migrants away or forcing people to pursue different paths to migration (e.g. partner visa). The issues and deficiencies in the system also impact migrants, refugees and asylum seekers already in Australia who are seeking skills recognition in order to improve their employment prospects. Research indicates that only one third of permanent arrivals have their post-secondary qualifications recognised in Australia; as a result, the remainder often resort to jobs well below their skill level.¹ This comes at significant economic cost to both the foreign national and Australia, and takes place in the context of a critical skills shortage in this country and widespread vacancies for skilled jobs.

These matters were comprehensively canvassed in recent reports including the 2023 Billion Dollar Benefit report,² and the 2018 Deloitte Access Economics report for Multicultural Affairs Queensland.³ The reports detail how underutilisation of skilled migrant and refugee labour is affecting Australia's global competitiveness and economic productivity as a country, as well as having negative socio-economic impact on the affected workers. Queensland alone stands

¹ Settlement Council of Australia (SCOA), 2019, *Recognising Overseas Skills and Qualifications: Maximising human capital in newly arrived Australians*, available at: http://scoa.org.au/wp-content/uploads/2019/05/Recognising-Overseas-Skills-and-Qualifications_Maximising-Human-Capital-in-Newly-Arrived-Australians-1.pdf.

² Settlement Services International (SSI), 2023, *Billion Dollar Benefit*, available at <https://www.ssi.org.au/policy-advocacy/campaigns/billion-dollar-benefit/>.

³ Deloitte Access Economics, 2018, *Seizing the opportunity: Making the most of the skills and experience of migrants and refugees; A research report for Multicultural Affairs Queensland*, available at: <https://www.des.qld.gov.au/multicultural-affairs/programs-initiatives/research-report>

to lose \$250M over the next 10 years due to under-utilisation of skilled migrants.⁴ Both reports identify issues with the skills recognition system as one of the key barriers to obtaining skilled employment in Australia. This is not a new issue – as far back as 2006, the Productivity Commission described Australia’s skills assessment and recognition scheme as complex, time-consuming and bureaucratic.⁵

We appreciate that increased global competition for skilled labour post-pandemic has turned the Government’s focus on making sure all elements of Australia’s skilled migration system, including skills assessments, are operating as effectively as possible in order to maximise Australia’s attractiveness to skilled migrants. Key recent initiatives in this regard include the comprehensive **Review of the Migration System** and related report,⁶ which *inter alia* acknowledges the need to improve and streamline the skills recognition system in order to improve Australia’s economic productivity, prosperity, and global competitiveness for highly skilled migrants, and to allow migrants to realise their full potential. We also note the DEWR’s series of **Skills Assessment Pilots**,⁷ which attempt to respond to challenges in achieving skills recognition in the current system.

Against this background, the ECCQ commends the DEWR’s efforts in putting together a set of Best Practice Principles and Standards (**Draft Principles**) for assessing authorities, as detailed in the related Discussion Paper,⁸ as a starting point to addressing issues and deficiencies in the skills assessment framework. A summary of the draft principles and related standards, as outlined in the Discussion Paper, is attached at Appendix A.

The matters addressed by the Draft Principles correlate with feedback about the **issues and deficiencies in the system**, which **chiefly include** complexity of the skills assessment system; generally expensive fees and long processing times; lack of consistency in requirements, fees and processing times across occupations; and disparity among requirements for skills assessment, visas, and occupational licensing/registration.

The ECCQ commends the DEWR for consulting with stakeholders about the Draft Principles and giving a broad cross-section of organisations and individuals an opportunity to provide feedback on the operation of the current system and proposed reform in the form of the Draft Principles. The ECCQ welcomes the opportunity to contribute to the discussion around whether the Draft Principles are sufficient and appropriate to address identified issues and

⁴ Deloitte (2018) *Seizing the opportunity: Making the most of the skills and experience of migrants and refugees: A research report for Multicultural Affairs Queensland*. <https://www.des.qld.gov.au/multicultural-affairs/programs-initiatives/research-report>

⁵ Productivity Commission, 2006, *Economic Impacts of Migration and Population Growth*, available at: <https://www.pc.gov.au/inquiries/completed/migration-population/report/migrationandpopulation.pdf>.

⁶ Department of Home Affairs, 2023, *Review of the Migration System* report, available at <https://www.homeaffairs.gov.au/reports-and-pubs/files/review-migration-system-final-report.pdf> at p. 157-161.

⁷ Skills Assessment Pilots – see <https://www.dewr.gov.au/skills-assessment-pilots>

⁸ Discussion Paper - see <https://consultations.dewr.gov.au/best-practice-principles-and-standards-for-skilled-migration-assessing-authorities>.

improve skills assessment processes to deliver better outcomes for migrants, employers and industry.

In our view, the Draft Principles will undoubtedly serve as a guidepost, providing direction on how to improve the current system to make it more user-friendly, efficient and effective. However, the success of these reform efforts will turn on the rate and degree of adoption of the Draft Principles and adherence to related standards, as well as successful implementation of initiatives to achieve the Draft Principles.

Importantly, meaningful improvement in employment outcomes for migrants and refugees turns on a broader scope of factors beyond just the skills assessment framework, including provision of assistance with job searching and recruitment, cultural awareness and soft skills training for job readiness in the Australian market, and education about worker rights in Australia. However, in this submission we will focus on the skills assessment framework as that is the scope of the current consultation.

Internal Consultations and Engagement

ECCQ held two group consultations and several one-on-one in-depth conversations and interviews throughout September and October 2023 to gather input from our members and community stakeholders on the Draft Principles and related consultation questions. Those consulted included individuals with personal experience of the skilled migration system in Australia (including the skills assessment component), academics and researchers specialising in the migrant workforce in Australia, community centre representatives who advise and assist migrants, as well as those who provide professional services to skilled migrants (e.g. migration agents). We consulted with members living in metropolitan areas and in regional areas throughout Queensland, as well as one member currently based in Victoria.

The feedback from our consultations was consistent with reported and well-known issues in the system, chiefly complexity, inconsistency, delays, costs, and lack of transparency. Those we consulted expressed an overall dissatisfaction with the current skills assessment system due to the aforementioned factors, among others, which erode trust and confidence in the system.

Members consulted cited numerous examples of themselves or people they know working outside of their occupation and below their skill level due to issues with the skills recognition system. This includes:

- A social worker currently working as a cleaner in Brisbane despite having social work degrees from the Democratic Republic of Congo and Uganda and 12 years of work experience as a project manager for an UNHCR affiliated organisation.
- An early childhood teacher who works as an assistant in a childcare center in Brisbane rather than as qualified teacher, due to the downgrading of her Early Childhood Teaching qualifications from Bachelor to Diploma level during the assessment process.

An academic based in Queensland at Torrens University who participated in the consultations shared her recent research on highly skilled migrants and their employment outcomes in Australia. She highlighted several additional examples that illustrate the practical impact of issues and deficiencies in the current system, including:

- A medical doctor who, despite enjoying a successful career in Europe, faced challenges upon migrating to Australia. She was unable to complete all the necessary medical skill assessments due to pregnancy and subsequent complications that required specialist care for her child. By the time she was ready to sit the final test, she was informed that the allowed timeframe for taking the exam had passed and she had to abandon her application. As a result, she now works as a lab technician, and feels her skills have been wasted. She reported that, in contrast to previous years when support was available for foreign qualified doctors transitioning into the medical field through peer groups and medical English language courses, she had no support or guidance and had to navigate her journey on her own. This discouraged her from pursuing the required skill assessments anew.
- A female engineer with a successful career overseas made a family decision to settle in Queensland. However, due to the lengthy processing times and the costs associated with getting her engineering qualifications recognised, she was faced with a challenging situation in terms of supporting herself and her family. Unable to afford an extended period without employment in her engineering profession, she opted for a career change. She now works as a yoga instructor and experiences skills atrophy.
- An overseas-qualified early childhood educator with a university degree and work experience found herself unable to afford the lengthy skills assessment process or the commencement of Vocational Education and Training (VET) studies in Australia to obtain Australian certification in her field. Similar to the engineer in the above example, the need to provide for her family forced her to accept employment outside her field and she began working in retail. This transition left her feeling disheartened, as conversations with friends and colleagues indicated that she would not have encountered the same challenges in other countries and would have been able to continue her career in early childhood teaching.

- A management/HR professional with executive leadership roles in global companies, despite having her qualifications recognised and assessed, could not secure a job in Australia and was left unemployed. In her view, the market was saturated, and employers were sceptical and unwilling to offer her a role due to her lack of local experience. She said it took her and her husband (also a highly skilled migrant) over a year to gather all required documents and the list grew each time they contacted the assessing authority. When they finally shipped all the paperwork required for the skills assessment application it weighed over 2kg.

In this submission, the ECCQ makes a series of recommendations to improve the skills assessment system based on consultation with our members. For ease of reference, recommendations are set out in **blue** text, in **bold** and *italics*, in the body of the document.

Response to review questions

Questions about the draft principles and standards

Question 1: Which standards will improve outcomes?

Why/why not?

Each of the Draft Principles and related standards addresses known deficiencies in, and problems with, the current system so to that extent all of the standards stand to improve outcomes if effectively implemented. However, there is scant information about how these standards will be implemented, or how implementation will be monitored.

The Discussion Paper states that Government intends to monitor and manage the assessing authority sector more effectively through an “enhanced assurance model”, which will “ensur[e] skills assessments are migrant-centric and being delivered optimally in terms of process, standards, timeframes, industry requirements and cost.” The Discussion Paper notes that this model will be “designed around a shared understanding of **best practice principles** that skills assessment delivery will be monitored against and include **new standards for assessing authorities** to deliver optimised outcomes for Australian employers and migrants.” However, there is no further detail provided about how the monitoring will take place, and how Government will ensure commitment and compliance by assessing authorities.

The success of these reform efforts will turn on the rate and degree of adoption of these Draft Principles and adherence to related standards by assessing authorities. Since they are neither laws nor regulations, compliance by assessing authorities will be voluntary – unless there is some way to compel adherence to the principles/standards, such as by building them into periodic certification for assessing authorities. It will also require measurement, evaluation and reporting on the degree, if any, of compliance and whether this is making a difference to the practical operation of the system and improving outcomes for migrants.

Furthermore, the Draft Principles and standards must be viewed as part of the overall skilled migration system, and not in isolation only in relation to the skills assessment portion of the skilled migration journey. Migration and employment outcomes will be improved if a holistic, systemic view is adopted, understanding what comes before and after skills assessment and how it fits into the overall process.

Question 2: Which standards are achievable and why/why not?

The Draft Principles and standards appear to be reasonable and proportionate to the desired outcome. To the extent that they are high level aspirational statements rather than specific prescriptive goals or targets, this increases their achievability.

The success of Skills Assessment Pilots recently deployed by the Government as part of reform efforts demonstrates that, with appropriate support, it is possible to deliver faster, cheaper skills assessments more efficiently and thereby improve employability prospects for migrants.

The current Government focus on reform of the migration system in Australia shows that there is sufficient interest and engagement in order to achieve reform in relation to skills assessments as one component of the overall system.

Question 3: What have we missed?

We respectfully submit that there is an opportunity to further develop Principle 7 (Integrity and Transparency) beyond what is found in the Discussion Paper. In order to improve the quality and integrity of the system, assessing authorities should be required to employ appropriately qualified or trained subject matter experts to conduct the assessments, and avoid assigning low-skilled administrative staff to complete a ‘tick the box’ exercise. Members consulted mentioned anecdotal evidence that some assessing authorities had scrambled to

find staff to handle rising workloads as migration resumed post-COVID – this resulted in appointment of less than ideal candidates to assessor roles in a bid to manage workload. If that is indeed the case, appropriate training needs to be provided to these workers to ensure they can competently and efficiently perform their duties.

To further promote integrity, each assessing authority should have a process for internal audit and review of assessments (e.g. 10% of all assessments conducted) to ensure quality and consistency in decision making across the organization.

Recommendation: Assessing authorities should employ appropriately qualified or trained subject matter experts to conduct the assessments, and should have process for internal audit and review of assessments to ensure quality and consistency in decision making across the organisation.

The ECCQ would welcome further information on how the Government plans to encourage, incentivise or mandate adherence to the Draft Principles and standards, as well as any penalties for non-compliance. We are interested to know how and by whom compliance will be measured and evaluated, and whether there will be any reporting of the resulting findings.

The ECCQ is interested to know if there are any other initiatives planned by Government to improve the system, that will deliver the practical benefits envisaged by the Draft Principles. Our consultations confirmed that apart from issues with skills recognition, skilled migrants and refugees often encounter additional barriers to employment, chief among them the requirement for local (i.e. Australian) work experience.

This parochial and outdated requirement – which is totally antithetical to the globally oriented approach that Government would like Australia to adopt – is a major barrier to migrants obtaining suitable employment in their field. We do recognise that in some occupations local experience will be critical to competent performance of the role, but these will be very few indeed.

“ We have job ready skilled migrants, but no-one is willing to employ them due to lack of local experience.”

The benefits of local experience, such as knowledge of local systems and processes and development of local networks, can quickly be developed through on-the-job learning. An otherwise promising candidate should not be excluded merely for lack of local experience.

Recommendation: Government to engage with businesses and industry groups around the “local experience” requirement in an effort to change this mindset where local experience

is not objectively necessary in order to competently perform a particular occupation. In the meantime, Government to develop pilot programs and implement incentives (such as tax cuts) for the private sector to engage newly arrived skilled migrants or recently graduated international students, thereby addressing migrants' need for local experience whilst simultaneously increasing the diversity of their workforce.

Questions about the delivery of skills assessments

Question 4: What changes are needed to improve skills assessment processes to make them simpler and more migrant centric?

In order to make the skills assessment experience simpler and more migrant-centric, first and foremost, the system needs to be understood and evaluated from the migrant's perspective. There are existing reports which highlight migrants' experience of the system, such as the Billion Dollar Benefit report and the Deloitte Access Economics report, as well as academic research in the area. We urge Government to consult these reports and research to understand what is working and what is not, and to identify specific areas for improvement.

The Deloitte Access Economics report confirmed that cultural and language differences can make navigating the process of skill recognition, visa application, professional registration, and job seeking in Australia difficult for migrants and refugees. The complexity of the system, lack of clarity and transparency around processes, and lack of uniformity across jurisdictions exacerbates this challenge. The report found that not only was this an issue for migrants and refugees but also for the community service providers and non-profit organisations that work with this cohort.⁹

⁹ Deloitte report at p.8.

Those we consulted who have gone through the skilled migration process attested to the complexity of navigating the system and spoke of people creating checklists and step-by-step diagrams of the skilled migration process. This is done ad hoc and the same effort is duplicated countless times as people do it on an individual level. Those lucky enough to have access to these resources find their experience greatly improves once they have guidance to follow.

“We got a step by step instructions and checklist from a friend. Once we followed those steps, it was easy. But trying to do it on your own is very difficult. You are not in Australia, you aren’t familiar with the language, terminology. It means nothing to someone not familiar with the system.”

“If Australia wants to attract the best and the brightest, we need to make the system easy to understand and navigate – otherwise, prospective migrants go elsewhere, where the process is easier or where they can get assistance to complete it.”

We received feedback that due to complexity, length of time it takes and costs involved, migrants who have knowledge and skills that are in demand and who would be a boon to Australia, give up and **abandon their migration application** and go with another country that offers a simpler, faster, cheaper and more transparent process such as Canada, Great Britain or New Zealand.

There have been calls for creation of a **national oversight body** and overarching **information portal/gateway hub** that could assist users to navigate the system and obtain relevant information, advice and referrals to appropriate service providers – and indeed this was reflected in our consultations. For instance, the Billion Dollar Benefit report has called for **centralisation of the system** under federal legislation and harmonization of recognition processes across State and Territory governments. The report gives the example of Denmark, which has a national recognition agency with oversight of the skills assessment process for all holders of overseas qualifications, and Canada, which has a federal agency (Office of the Fairness Commissioner) that ensures that recognition requirements and processes for recognition of overseas credentials are fair, transparent, consistent and reasonable.¹⁰ Whether centralisation of the system in Australia under one agency is feasible would require considered investigation, taking into account differences

¹⁰ Billion Dollar Benefit report at p. 12.

across occupations, differences in occupational licensing requirements between States and Territories, and funding needs.

Recommendation: Government to investigate the feasibility of creating a national oversight body within the DEWR to monitor and manage the assessing authority sector more effectively, ensuring skills assessments are migrant-centric and being delivered optimally in terms of process, standards, timeframes, industry requirements and cost.

At the very least, the ECCQ supports the Billion Dollar Benefit report recommendation for creation of a “**one-stop-shop for information**” about skills recognition and occupational licensing, to help migrants navigate the system. This could take the form of web-based step-by-step guides specific to each occupation and State/Territory or a more advanced online search tool to provide information tailored to an individual applicant’s needs. Guides should include visual aides where possible, including flowcharts and diagrams, to assist with comprehension. The report gives the example of the ‘Recognition in Germany’ portal, a national multilingual online portal for all information on skills recognition processes in Germany, which includes an innovative ‘recognition finder’ tool where applicants enter their occupation and location to automatically receive tailored, step-by-step information on how to get their skills recognised.¹¹ As an indicator of the portal’s success, applications for foreign skills recognition in Germany more than doubled in the four years following its launch.¹²

The ECCQ supports the funding of one overarching effort to **develop an authoritative set of centralised resources** (information, checklists, guides, etc), and then focus on promoting use of those resources to migrants and refugees as well as community groups and service providers who work with this cohort. This would eliminate the need for individuals and groups to create their own resources in an ad hoc and unstructured way and allow them to focus on their core business/activities where they can really add value. It would be highly beneficial if these guidance documents could be made available in languages other than English.

Recommendation: Government to create and fund a centralised navigation hub and suite of resources to assist users to navigate the system. When developing resources, create visual aides where possible, including flowcharts, diagrams and videos, to convey complex information and assist with comprehension. Supplement resources with information forums, webinars, and dedicated phone lines or live chat capabilities to assist with

¹¹ Billion Dollar Benefit report at p. 12.

¹² Billion Dollar Benefit report at p. 12.

information gathering and answering of questions. Provide translations of resources into languages other than English, where possible, based on primary language of applicants.

One of the academics we consulted suggested that assessing authorities provide **pre-evaluation consultations or advisory services** to prospective migrants. This kind of practical, case-specific support would be of great benefit to migrants helping them to understand the assessment process, the requirements, and potential pathways to address any deficiencies in their qualifications, experience or related documentation prior to incurring the cost of making an assessment application.

Recommendation: Assessing authorities to provide pre-evaluation consultations or advisory services to prospective migrants, to help them understand the assessment process and requirements specific to their occupation, and address any deficiencies in their qualifications, experience or related documentation prior to making an assessment application.

Another criticism of the skills assessment process that emerged during consultations is the **length of time** it takes to get a decision and the **inconsistency in timeframes** among different assessing authorities. Consequently, couples who apply for skills assessments can be waiting for vastly different periods of time to receive a response, and this makes it difficult to plan ahead and also to comply with visa timeframes.

Individuals we consulted expressed their frustration at the **lack of information available about the progress and status of their case** and when a decision can be expected. Processing timeframes on assessing authorities' websites are often inaccurate and this causes issues with planning. Feedback from members who had been through the skills assessment process said it took anywhere from 6 months to 2 years, despite some assessing authorities advertising processing timeframes at around 3-4 months. The average processing time was around 8-18 months. Feedback from our engagement indicates that VETASSESS are particularly slow at the present time.

Protracted processing timeframes and delays in obtaining skills assessments is adversely impacting some visa applications with limited application timeframes – in other words, delay in getting the skills assessment causes the applicant to miss the filing timeframe for their visa application. This puts the person to the time, expense and stress of coming up with a temporary solution such as applying for an extension of an existing visa or a new visa altogether, in order to remain in Australia while they await the outcome of their skills assessment.

As a result of protracted processing times and lack of transparency about case status, it is not uncommon for intending migrants to withdraw their applications altogether and pursue migration to a more “user friendly” country with faster processing times, such as Canada, Great Britain or New Zealand. If our aim is to increase Australia’s attractiveness as a destination for skilled migrants, this is clearly a significant loss.

Recommendation: Government to recommend reasonable processing times for various types of assessments and incentivise assessing authorities to adopt them, to improve consistency and uniformity in the system. Assessing authorities to devote additional resources to ensure their services are appropriately staffed to be able to meet reasonable processing timeframes and avoid skilled migrants abandoning their applications due to delay.

Recommendation: Government to require assessing authorities to improve transparency by providing updates on case status and progress (e.g. via online portals), so that applicants are up to date and can confidently plan their migration journey and migration agents can confidently advise their clients.

Another criticism of the skills assessment process that emerged during consultations is the **costs associated with the process**. The general perception is that the assessments are too expensive, particularly for refugees and asylum seekers who are seeking to obtain skills recognition after arrival in Australia, and the high cost is a deterrent to people pursuing skills recognition. We support the recommendation in the Billion Dollar Benefit report to restore **government funding or subsidization** of the skills recognition process for occupations in demand, particularly for refugees and asylum seekers already in Australia (e.g. as existed under Australia’s Assessment Subsidy for Overseas Trained Professionals (ASDOT) scheme, which ceased in 2015).

There is also a **lack of consistency in fees** across different assessing authorities. Whilst it is understandable that some assessments will be more complex than others and therefore require more time (and therefore justify a higher fee), there is no reason why straightforward document-based assessments should command vastly different fees depending on the occupation and assessing authority.

Recommendation: Government to direct assessing authorities to ensure fees are fair and appropriate for service provided and that there is consistency among authorities for similar services. Government to reinstate a subsidy program to help pay for skills assessments for intending migrants, refugees and asylum seekers who can demonstrate economic need for financial support and have qualifications in occupational areas that are in demand.

Additional concerns were raised during our consultations around **competency** and **flexibility**.

In relation to competency, a migration agent we consulted highlighted assessment practices at an assessing authority for IT occupations which are causing unfair results for applicants. The example given concerned assessors requesting documents that were already submitted in an initial application; although the applicants resubmit the documents, the application is ultimately denied for failure to provide the required documents. This could be an anomaly caused by IT systems issues, however it should be investigated in case staff training is warranted. Where there are multiple examples of similar occurrences, it would be beneficial to be able to raise these with an overarching supervisory authority.

In relation to flexibility, the feedback from our consultations was that there is a lack of flexibility around how applicants can satisfy requirements for skills assessment. Assessing authorities are overly rigid in requiring specific documentation in specific forms and there is a refusal or reluctance to accept alternatives. There is a lack of assistance and case-specific guidance about sufficiency of documentation.

Those we consulted spoke of difficulties in accessing documents particularly where their country has undergone war, natural disaster, or some other form of crisis, or where their country of origin has different rules and practices around recording keeping (e.g. documents kept only in paper form for a maximum of 7 years so are no longer available after that timeframe as they have been destroyed). Applicants are also faced with situations where they are unable to obtain employment reference letters as the institution or company is no longer in existence. There is generally no indication of whether any alternative evidence may be acceptable and, if so, what form that should take.

The ECCQ calls on assessing authorities to be **more flexible and open minded** about how applicants can satisfy documentary and work experience requirements. This includes providing options or alternatives where an applicant cannot provide a particular type of documentary evidence. It would be useful to have guidance by country/region and document category, explaining what equivalent or alternative types of documents may be considered if a particular kind of document is not available.

Assessing authorities could offer **practical workplace-based assessments** as a means of testing knowledge and skills. On-the-job, skills-based assessment also mitigates risks associated with document fraud (i.e. falsified documents evidencing would-be qualifications).

***Recommendation:** Assessing authorities to stipulate alternatives that can be provided if required documents are not available, or other options for conducting skills assessment in those circumstances, such as practical workplace-based assessments.*

***Recommendation:** Assessing authorities to accept digital documents in lieu of paper documents, in line with accepted contemporary technological practices.*

Members consulted indicated that applicants for skills assessment would also benefit from provision of **templates** for documents required by assessing authorities, such as employment reference letters, in order to expedite the preparation of materials for skills assessment and ensure that applicants are providing materials sought by assessing authorities in relation to both form and content.

***Recommendation:** Assessing authorities to provide applicants with template documents to expedite preparation of materials for skills assessment.*

Members consulted also called for more **flexibility** in how to address and rectify any **minor shortfalls in qualifications**. Some occupations are being held to very strict requirements, which individuals simply cannot meet if they did not study a particular subject/area of competency or undergo a particular work placement/internship in their degree. All that is missing from granting the desired equivalency is completion of this one aspect of the overall qualification. This is particularly the case with individuals who completed university studies many years ago, where current mandatory subjects were not taught. If the assessing authority cannot find evidence of the required subject or work placement on a person's transcript, they will not recognise the overseas qualifications as equivalent to Australian qualifications in the field. A migration agent we consulted gave the example of teaching requiring a 45-day placement during the completion of studies; this is an absolute requirement such that the relevant assessing authority will not grant equivalency if the applicant has not completed such a placement during the course of their studies. This is a stumbling block for many of her clients with foreign teaching degrees – many of them have years of post-qualification teaching experience but they will not qualify for the skills assessment because their studies did not contain a practical work placement. This is an absurd result that defies logic. The assessing authority should take their experience as a whole and determine if they have demonstrated knowledge and skills commensurate with a 45-day practical work placement.

Where an applicant is missing a small amount of subject matter knowledge/skills required for equivalency, the assessing authority should be able to allow the person to complete an

affordable micro-credential in the relevant area, in order to supplement their previous study and bring it up to current Australian standards, rather than requiring them to abandon the assessment and study a full tertiary-level course in Australia in order to obtain the missing knowledge/skills. Alternatively, the assessing authority could conduct an on-the-job practical assessment to identify if the applicant has gained the required knowledge and skills through work experience. This form of flexibility would facilitate skills recognition for a large number of individuals who narrowly miss out under the current system.

Recommendation: Assessing authorities should have a degree of flexibility to permit applicants to fill small gaps in knowledge or skills by completing supplementary micro-credentials or evidencing knowledge or skills gained through experience by undergoing a practical, workplace-based skills assessment.

Finally, those we consulted highlighted the need for improved **transparency** in the assessment process, in particular in relation to providing **reasoning for negative decisions** or those that do not grant the required equivalency (e.g. granting a lower level qualification such as a Diploma rather than a Bachelor). The general feedback was that applicants are not given sufficiently detailed and clear reasoning as to why their desired equivalency was not granted, and no direct contact with assessors to be able to ask questions or request explanations. This makes it difficult for applicants to appeal a decision or prepare any subsequent application that has good prospects of success. The **assessment system needs to be transparent and accountable** so that users understand how their application is being managed, and why and how decisions are made.

Sometimes applicants receive decisions that seem illogical or contradictory. For example, one Polish migrant we consulted stated that her Bachelor's degree in Early Childhood Teaching from Poland was only recognised at an Australian Diploma level by the relevant assessing authority. This negated her prospects of finding work in the childcare field commensurate with her qualifications, and has forced her to accept lower skilled positions within the centre. The irony of this situation is that prior to arriving in Australia, this woman had worked as a kindergarten teacher in Great Britain where her qualifications were recognized as equivalent to a UK Bachelor's degree in Early Childhood Teaching. In Australia, a UK Bachelor's degree in Early Childhood Teaching is generally granted equivalency with the corresponding Australian qualification. So, if Australia recognizes the UK qualification as equivalent to its Australian counterpart, and the UK recognized this woman's Polish qualification as equivalent to its UK counterpart, why does Australia not recognize the Polish credential as equivalent to its own? This outcome was very disheartening for the migrant worker and one that has impacted her career progression and earning ability to this day.

***Recommendation:** Improve transparency and accountability by requiring assessment authorities to providing a statement of reasons for negative decisions or those that do not grant the required equivalency, and clearly explain review or appeal rights. Allow applicant's some level of meaningful direct contact with the assessment authority, if not the actual assessor, beyond a time-limited telephone line operated by call centre staff, to allow them to ask questions or provide information about their application.*

Question 5: Are skills assessments appropriately aligned with domestic employment, visa, and licensing/registration requirements? Why/why not?

The **alignment** of skills assessments with domestic employment, visa, and licensing/registration requirements in Australia **varies** depending on factors including the specific occupation, the assessment authority responsible for that occupation, market needs and region/location.

ECCQ's consultations revealed that migrants are frustrated by the presence of **both duplication and inconsistencies** between skills assessment requirements and requirements for employment, visa, and occupational licencing/registration. Duplication requires a repeat sacrifice of time and results in payment of additional fees. Inconsistencies cause disillusionment among skilled workers who typically believe that once they successfully complete one part of the process to gaining skilled employment in Australia (e.g. skills recognition), the others will naturally follow (e.g. getting licensed/registered and securing employment). What they quickly discover is that obtaining a skills assessment and skilled migrant visa merely grants them the right to work, but not the ability to work in their field (which requires occupational licensing and a job offer) – this leaves skilled migrants in “labour market limbo”.¹³ From our consultations it emerged that this is common in engineering and health industry occupations like nursing, where there are additional requirements to achieve licensing/registration (e.g. sitting exams, additional study or work experience). This can lead to skilled migrants working in lower paid jobs (at least temporarily, if not permanently), thereby undermining productivity gains associated with the migration program.¹⁴

¹³ Review of the Migration System report at p.160. See also Deloitte Access Economics report at p.30.

¹⁴ Review of the Migration System report at p.160.

Members consulted noted that sometimes there is a **lack of uniformity** between what is required for the skills assessments versus what is required for the migrant visa application or by the employer/industry when recruiting for the role – with higher requirements being imposed at the skills assessment stage.

For example, in some occupations, a **higher level of English is required** for a successful skills assessment versus the general English requirements for skilled migration. Social Work is an example of one such area – the Australian Association of Social Workers (relevant assessing authority) requires an International English Language Testing System (**IELTS**) level 7.0 score whereas the Department of Home Affairs accepts IELTS level 6.0 for migrant visa purposes. To further illustrate this point, one of our members gave an example of a foreign qualified doctor who had an IELTS level 7 score, which was sufficient for occupational licensing purposes, but could not get over the first step of the skills assessment because the assessment authority required an IELTS level 8 score. The doctor tried to pass the level 8 exam but was unsuccessful and further attempts were prohibitive due to the cost of the exam. This meant that someone who should otherwise be able to work pursuant to grant of a skilled migrant visa, with a key benefit of being able to work bilingually and provide services to members of his own language and cultural group, was precluded from working in his field despite a shortage of General Practitioners in Australia.

Recommendation: Assessing authorities should bear in mind contemporary industry and employer requirements when setting parameters for equivalency assessment, and consider lowering requirements in areas which are not critical to the job (e.g. IELTS test scores). Higher requirements should not be imposed at the skills assessment stage versus the visa application and/or registration stages, unless there is a legitimate reason for doing so (e.g. advanced or expert level English is critical in order to competently perform that particular occupation).

Further in relation to English language skills, those we consulted suggested that rather than requiring a high level of academic English per the highest IELTS levels (which is very theoretical and not of direct practical use in daily life), it would be more useful for assessing authorities to accept a lower IELTS test score (such as level 6 or 7) in combination with proof of completion of an **occupation-specific English language course**. These types of courses could even be offered by the assessing authorities themselves, or the assessing authority in partnership with a training provider. This would be of much greater value to skilled migrants and directly improve their job readiness for their specific field. Some participants in our consultations noted that someone can have a very good command of English and yet still be unfamiliar with local jargon and occupation specific terminology. One of the academics who took part in our consultations stated that even migrants with international experience in

English-speaking countries such as the United States and the United Kingdom often find that, despite having completed IELTS or Cambridge Assessment language tests at a high level, they need to learn local Australian jargon and occupation-specific terminology, because this differs from jargon and terminology used in American or British English.

Recommendation: Increase delivery of affordable English language courses for migrants in occupation-specific terminology and local jargon, especially where this can be accepted in conjunction with a lower level IELTS score as proof of adequate competency in English for a given occupation.

In relation to skills assessments and **employer requirements**, those we consulted noted that migrants are put to great time, effort and expense to go through the skills assessment process, only to find out that recruiters and employers have little regard to the skills assessment. Thus, achieving the skills assessment does not translate to employability for the migrant worker. In particular, employers have little regard for the applicant's IELTS test score, which many applicants note as the biggest stumbling block to successfully completing a skills assessment. Employers predominantly care about whether the individual has work

authorisation and work experience in the field – and this is where the common requirement for local (Australian) experience becomes a barrier for many newly arrived migrants who are seeking employment. While applicants for skills assessment are often required to demonstrate a certain level of work experience in their occupation – which can be challenging to document, especially where an individual has worked in various countries or for multiple employers and some of those institutions or companies no longer exist – when it comes to job hunting, this overseas experience is disregarded by the industry/employer, as candidates are told that they are not suitable for the role due to lack of local experience. This lack of congruence between requirements for skills assessment and employer requirements in practice is frustrating for migrants who are seeking employment after having successfully obtained a skills assessment.

“The skills assessment was not even looked at because all they were looking for was “Australian experience”. If you don’t have local experience and references you can’t even get an interview.

The system needs a reality check to bring it in line with what recruiters and employers actually want.”

***Recommendation:** Educate employers about skills assessment and its value and relevancy to job qualification and job readiness. Help them to understand the journey migrants go through to obtain the skills assessment and how evidence of qualifications and experience can be useful to employers.*

Question 6: How could skills assessment processes be streamlined with occupational licensing and registration schemes?

Occupational licensing and registration requirements are paramount and should inform criteria for the migration system, including skills assessments. Where occupational licensing requires Australian experience, this should be factored into migration system settings in a realistic and achievable way.

The feedback from our consultations was that challenges associated with skills assessments differing from occupational licensing and registration requirements are exacerbated by the fact that there are **different occupational and professional licencing requirements in different States and Territories** throughout Australia. This complexity makes it very time consuming and costly for migrants. The need to apply in multiple jurisdictions is a real issue for migrants due to their lack of informal employment networks – this means they often seek work over a wider geographical area, in order to secure a job commensurate with their qualifications.

Although international mutual recognition of qualifications and licensing is outside the scope of this review, we nevertheless note that improvements in this area and wider recognition of inter-state (within Australia) and international qualifications would significantly assist to simplify and streamline qualifications recognition and occupational licensing.

***Recommendation:** Government to develop strategies to align skills assessments, visas and occupational licensing/registration processes. Federal Government to work with States and Territories on a strategy to oversee efforts to streamline processes for occupations that stand to have the most benefit to the economy. This could include creating an avenue for submitting one application to multiple assessing authorities across more than one State/Territory, both for skills assessment and occupational licensing – rather than requiring individual applications to each body for each stage of the process. Adjust fees accordingly.*

Recommendation: Provide for extended validity of skills assessment (e.g. up to five years) for the purpose of obtaining recognition of qualifications for occupational licensing and registration, to give migrants more time to obtain licensing/registration in more than one jurisdiction should their employment circumstances require it.

In relation to a lack of cross-jurisdictional uniformity, one of our consultation participants noted that there does not appear to be any plan to incorporate skills recognition for migrants in the 5-year National Skills Agreement, which is currently being developed by the Skills and Workforce Ministerial Council and which is due to commence on 1 January 2024.¹⁵ Given the size of Australia’s migrant workforce and that the challenge requires interjurisdictional cooperation, migrant skill recognition should be explicitly identified as a priority work program for the Ministerial Council.

Recommendation: Make migrant skill recognition a priority work program for the federal Ministerial Council, including in relation to developing the 5-year National Skills Agreement.

Question 7: What other functions could assessing authorities deliver to support employment and migration outcomes?

Participants in our consultations were very positive about additional functions assessing authorities could perform in order to achieve improved employment and migration outcomes. A key theme that emerged was the need to provide appropriate ‘after-care’ for migrants to support their post-assessment migration and employment journey – including information on job searching, labour market intelligence, registration/licensing requirements, worker rights and relevant unions. This is lacking in the current system and leaves migrants feeling abandoned once they arrive in Australia and go to look for work.

“ There is a feeling of abandonment – once you’ve paid all the fees and are in the country, you are on your own in terms of finding a job.”

Assessing authorities could provide a range of programs and resources to migrants, either on their own or in partnership with others, including:

¹⁵ <https://www.dewr.gov.au/skills-reform/national-skills-agreement>

- **Training, upskilling or bridging programs** tailored to the needs of migrants and their occupation and geographical location, helping them acquire the skills or knowledge (including Australian occupation-specific terminology and jargon) required to meet Australian standards for their occupation and bridge any gaps in their qualifications.
- **Workshops and resources** designed to enhance migrants' job search skills and employability. The content could cover topics like job search strategies, writing an Australian resume, interview techniques, networking skills, Australian workplace culture and behaviours, effective workplace communication, and more.

There is an opportunity for assessing authorities to **partner with academics, businesses, training providers, and community organisations** (such as the ECCQ), who are already doing good work in this area, to avoid duplication and maximise reach and impact.

Additionally, assessing authorities could work with Government and industry/employers to develop pathways for migrants to gain **work experience**, for instance through **internships, work placements, on-the-job training or shadowing**, particularly where local (Australian) work experience is required for a skills assessment or occupational licensing. This would be especially beneficial while an applicant is waiting the several months it takes to get the assessment. One of our consultation participants gave the example of NAB as a forward-thinking organization that has put in place programs in Melbourne to help migrants in Australia to gain local experience. If assessing authorities and the Government could partner with more organisations on such programs, that would go a significant way to addressing barriers created by the stated need for local experience.

By participating in such programs and initiatives, migrants would not only gain useful knowledge and skills but they would also have the opportunity to **build and grow their professional and social networks**, another key factor to success in the Australian employment market.

Assessing authorities could also **proactively educate employers** and industry on the benefits of a migrant workforce and the hiring of international graduates, thereby planting the seed of a global mindset that will eventually convince employers to forgo the requirement for "local experience" when recruiting.

Question 8: Should there be more than one assessing authority appointed to assess an occupation? Why/why not?

Whilst it is logical to assign different authorities to different occupations due to subject matter expertise, this has resulted in a very complex system that many migrants find difficult to navigate. During our consultations, participants were generally in favour of keeping distinct assessing authorities rather than centralising the function in one national body. However, participants suggested there is room for an overarching body at the national level to provide oversight and overall administration of the system, while individual industry or occupation specific assessment authorities could continue to perform the actual assessments.

As noted above in response to question 6, the need to apply for recognition and/or occupational licensing or registration on a State by State basis for some occupations creates additional complexity and burdens. The Government should consider developing a way to fast-track an application for recognition in more than one jurisdiction once a person has achieved recognition in one Australian State or Territory. Or allow one application to be simultaneously submitted to multiple jurisdictions (with reduced fees), to expedite the process. As far as possible, there should be consistency between State and Territory requirements (including use of similar forms) – the only exceptions should be where regulation of the occupation genuinely mandates different requirements across States and Territories.

Question 9: Should English language testing be a skills assessment requirement? Noting English levels are tested as part of the visa application stage.

We have already commented on English language testing in other parts of this submission, specifically in response to question 5, and these comments will not be repeated here.

Where English levels are tested as part of the visa application process through the IELTS exam, it would appear to be redundant to also require this for the skills assessment. Arguably, skills assessments should focus on occupation specific knowledge and skills (including occupational jargon) rather than general English language skills. Importantly, there is a need for English language requirements for the visa application process to mirror English language requirements for occupational licensing and registration, so that from the outset the migrant knows what level of English is ultimately required to secure employment in their field.

English language requirements should be reasonable and fit-for purpose. As pointed out in the Billion Dollar Benefit report, English requirements are higher than they need to be for skills assessment in many industries and this is a major barrier for migrants seeking to work in their field.¹⁶ This arbitrarily locks out skilled migrant talent from regulated professions and trades, including those with critical shortages. The ECCQ supports the recommendation made in the Billion Dollar Benefit report that English language requirements should be reformed, based on the minimum viable level required to competently perform a given role.¹⁷ Rather than focusing on advanced level academic English, it would make much more sense to test occupation-specific and industry-specific terminology that is much more practical and useful to the actual job to be performed. Nevertheless, we appreciate that English language testing should be preserved for migrants in certain occupations and from certain countries, where a risk assessment indicates it is warranted.

There is a perception among migrants, as confirmed by participants in our consultations, that English language testing is a money-making business or 'cash cow' and the requirements go beyond what is practically required. Test fees are expensive and many people are forced to take the test multiple times until they pass. Due to the fact that a candidate must pass all four components – reading, writing, listening and speaking – in one sitting in order to pass the test, this increases the difficulty of the test and the risk of failure. If you fail one component you have to do the whole test again, including paying the full fee again.

We also respectfully suggest that there needs to be a more considered approach for determining when proof of English language competency is required. For example, where an applicant is from a country where English is a recognized official language and the applicant has completed tertiary studies in English (albeit outside Australia), they should not be required to undergo English language testing. As things currently stand, this is not the case. One of the participants in our consultations pointed out that she was required to show proof of English language competency via IELTS test result despite being a qualified Marketing Professional from Zimbabwe (where English is an official language) who completed her university studies in Zimbabwe in English.

Recommendation: Evaluate English language requirements for skills assessment purposes to ensure they are reasonable and fit-for-purpose after risk assessment for a given occupation, and are consistent with both occupational licensing and skilled migration requirements.

¹⁶ Billion Dollar Benefit report at p. 16.

¹⁷ Billion Dollar Benefit report at p. 16.

***Recommendation:** Fund or subsidise language learning in the workplace, through programs that focus on occupation-specific terminology and local jargon relevant to the workplace.*

Question 10: Is there anything else you want to tell us about skills assessments?

No, all our feedback is covered in our responses to Questions 1-9 above. Thank you for the opportunity to provide this submission.

SUMMARY – DRAFT PRINCIPLES AND RELATED STANDARDS

PRINCIPLE-SUMMARY	DETAIL OF PRINCIPLE & RATIONALE	EXAMPLES OF RELATED STANDARDS FOR ASSESSING AUTHORITIES
<p>PRINCIPLE 1: Migrant-centric User friendly and migrant-centric experience</p>	<p>Clear, accessible, and user-friendly skills assessment processes, guidelines, and communications will enhance migrants’ overall experience and understanding of the system</p>	<p>1.1 Offer diverse communication channels/methods and adopting user-friendly platforms that are easy to navigate, expressed in simple language, and give helpful information about all aspects of the skills assessment process.</p> <ul style="list-style-type: none"> • Offer multiple interaction channels like live chat, webinars, information forums, and dedicated case managers. • Use visual aids like videos, infographics and cheat sheets to make complex topics easier to understand. <p>1.2 Provide timely, informative, and accessible updates regarding the status of an application.</p> <ul style="list-style-type: none"> • Online candidate portals to flag missing or inadequate documentation and offer application status tracking for transparency and efficiency. <p>1.3 Explore options to incorporate alternative skills recognition methods into skills assessments. [see also 4.2 below]</p>
<p>PRINCIPLE 2: Value for money Reasonable and justified fee structures</p>	<p>Ensure fees are commensurate with the cost of conducting high-quality skills assessments, do not impose an unreasonable barrier for prospective migrants, and represent value for money for applicants.</p>	<p>2.1 Provide transparency in setting fees and inclusions.</p> <ul style="list-style-type: none"> • Provide a clear and publicly accessible (e.g. via website) fee structure, outlining various service offerings that applicants can choose based on their needs. <p>2.2 Identify opportunities, and implement cost-effective strategies and practices, to remain cost-competitive in a global market.</p> <ul style="list-style-type: none"> • Offer discounts for combined assessments including employment-only, qualification-only, or combined, and allow applicants to choose these at will. <p>2.3 Undertake regular reviews of fees to ensure charges for skills assessment services are appropriate and commensurate with demand in an evolving skilled migration environment.</p>
<p>PRINCIPLE 3: Evidence-based</p>	<p>Well informed assessment standards that are fair, sensible, and relevant, ensure prospective migrants have the requisite skills to</p>	<p>3.1 Ensure occupational assessment standards do not go beyond what is required by industry and employers and any registration or licensing requirements for an occupation (e.g. requiring a Bachelor-level qualification</p>

SUMMARY – DRAFT PRINCIPLES AND RELATED STANDARDS

<p>Evidence-based occupational assessment standards</p>	<p>secure meaningful employment and contribute to Australian society.</p>	<p>when in fact employers accept a Certificate IV or III plus relevant employment experience.)</p> <p>3.2 Align English language requirements with visa and industry standards to reduce inconsistencies and confusion for migrants.</p> <p>3.3 Set a schedule for regularly reviewing occupational assessment standards in close consultation with key industry stakeholders such as employers and unions, to ensure continued relevance and competitiveness in a global market.</p>
<p>PRINCIPLE 4: Fair and equitable</p> <p>Fair and equitable assessments</p>	<p>An objective and unbiased assessment of an applicant’s skills promotes consistency and fairness, regardless of a migrant’s background</p>	<p>4.1 Eliminate bias or discrimination in the assessment process by applying procedural fairness and objective, equitable and consistent assessment standards.</p> <p>4.2 Offer flexible skills assessment processes, including appropriate adjustments and support for applicants with disabilities, refugees, or victims of exploitative employment arrangements. [see also 1.3 above]</p> <ul style="list-style-type: none"> • Practical-based assessments or alternative pathways are utilised when verifiable work experience and qualifications are unavailable due to exceptional circumstances. <p>4.3 Offer clear and fair complaints, review, and appeals processes.</p>
<p>PRINCIPLE 5: Timely and efficient</p> <p>Timely and efficient skills assessment delivery</p>	<p>The assessment process is optimised to reduce duplication and maximise efficiency.</p>	<p>5.1 Adopt efficient and streamlined assessment processes to minimise unnecessary delays or bottlenecks.</p> <ul style="list-style-type: none"> • Implement a client relationship team to ensure application completeness, regular communication, and assessment readiness management. • Remove redundant requirements, such as excluding exams duplicated in registration/licensing requirements for the occupation, to streamline the process. <p>5.2 Use technology to monitor caseloads and systematise and simplify administrative tasks.</p> <p>5.3 Develop robust contingency plans to handle fluctuations in demand and a constantly evolving skilled migration landscape.</p>
<p>PRINCIPLE 6: Employment-focused</p>	<p>Post-assessment assistance is provided to help migrants obtain meaningful employment, including vulnerable cohorts such as</p>	<p>6.1 Provide end-to-end information and after care for migrants to support their post-assessment migration and employment journey.</p>

SUMMARY – DRAFT PRINCIPLES AND RELATED STANDARDS

<p>Meaningful employment outcomes are enabled</p>	<p>partners, migrant women, and international graduates.</p>	<ul style="list-style-type: none"> • Provide outcome letters to successful applicants which offer comprehensive information on job searching, labour market intelligence, registration/licensing requirements, and relevant unions, ensuring a seamless transition into the Australian employment environment. <p>6.1 Lead or participate in ventures that proactively educate employers and industry on the benefits of a migrant workforce and the hiring of international graduates.</p> <p>6.2 Build an understanding of applicants’ visa and employment outcomes post-assessment to inform continuous improvement of skills assessment processes and standards.</p> <ul style="list-style-type: none"> • Conduct surveys of successful applicants 6-12 months post-assessment and implementing necessary process changes based on the feedback received.
<p>PRINCIPLE 7: Integrity and transparency</p> <p>Integrity and transparency in operations</p>	<p>Integrity and transparency in the operations of assessing authorities facilitates quality migration outcomes.</p> <p>In addition to being financially viable and having effective records and risk management practices</p>	<p>7.1 Foster ongoing engagement and cooperation with government through data provision on skills assessment caseloads, trends, and outcomes, and the development and testing of policy solutions to meet the needs of migrants and employers.</p> <p>7.2 Provide applicants with transparency in how data is handled and protected to meet Australian Privacy requirements.</p> <p>7.3 Implement effective fraud awareness and control measures to safeguard the integrity of skills assessments.</p> <ul style="list-style-type: none"> • Proactive collaboration with government and third-party providers around fraud detection and awareness provides assessing authorities with clear guidelines for handling suspected or confirmed fraudulent cases. This has allowed authorities to build extensive data libraries to efficiently verify potentially fraudulent documents.