

Review of the points test

Submission to the Department of Home Affairs

May 2024

Introduction

The Australian Chamber of Commerce and Industry (ACCI) appreciates this opportunity to provide feedback to the Department of Home Affairs in response to the discussion paper on the Review of the points test.

ACCI is Australia's largest and most representative business network. ACCI represents hundreds of thousands of businesses in every state and territory and across all industries. Ranging from small and medium enterprises to the largest companies, our network employs millions of people. ACCI strives to make Australia the best place in the world to do business so that Australians have the jobs, living standards and opportunities to which they aspire.

Migration, including temporary migration, offers many opportunities for our communities. As well as achieving cultural diversity, migration can assist in counteracting our ageing population, supplementing our workforce to fill skills and labour gaps, making us economically stronger, and creating jobs and improving Australia's workforce participation rate.

The points test is an important part of Australia's migration system. As other areas of the migration system are reformed and net overseas migration levels are being reduced, appropriate settings within the points test will be important to ensure Australia's migration system operates effectively and delivers the skilled workforce we need for the future.

We support a clear and simple points test that allows for faster processing times for prospective migrants. This is particularly the case for skilled migrants, especially in occupations with identified skills shortages.

ACCI's submission comments on several aspects of the current points test which could be improved, including weighting of overseas skilled work experience and trade qualifications, and flexibility of the points test to respond to evolving workforce shortages.

Consideration of comparable skilled work experience

ACCI would welcome increased weighting of relevant skilled work experience in countries with comparable qualifications and training. In the current system, this would be considered under the 'skilled work experience' criteria.

We note the government has recently committed funding to streamline skilled worker applications from countries with comparable qualifications related to housing and construction to ease worker shortages in these critical industries. There may be scope to expand this to the points test.

A multitude of approaches are required to combat current skilled worker shortages. By enabling skilled workers to obtain a points-tested visa more quickly by appropriately recognising prior work experience, some shortages may be addressed more quickly.

However, this increased weighting should not be equal to or greater than that of work experience in Australia.

Consideration of trade qualifications

There should be a re-weighting of education and qualifications to recognise the valuable role of Vocational Education and Training (VET) qualifications.

As noted in the discussion paper, the current weighting does not reflect the degree of difference in outcomes and does not consider VET and trade qualifications in the same manner as university degrees of any level.

With numerous reports and recommendations pointing to the need to increase the status and perception of VET, it follows that there should be an increased weighting of VET and trade qualifications in the points test, as well as consideration of these qualifications across the migration system more broadly.

Flexibility of the points test

It will be important to ensure that a reformed points test can remain flexible enough to adapt to Australia's changing and evolving skills shortages as they arise.

As analysis and consultation continues on current and future workforce shortages, particularly by Jobs and Skills Australia (JSA), the points test must be able to appropriately prioritise skilled workers for occupations in demand.

To ensure prospective skilled migrants can travel to and stay in Australia in listed occupations, the points test must be able to take these changes into account and allocate appropriate points accordingly, without the need for rolling reviews of the system.

This may require a new, non-prescriptive allocation of points, or bonus points, which can elevate the applications of those applicants with qualifications relevant to these shortages.

Next steps

We thank you for your consideration of our feedback. Should you require any additional information or clarification of any points contained within, please contact David Alexander, Chief of Policy and Advocacy at david.alexander@acci.com.au or Samantha McKenna, Senior Policy Adviser – Small Business and Tourism at samantha.mckenna@acci.com.au.

About the Australian Chamber of Commerce and Industry

The Australian Chamber of Commerce and Industry (ACCI) is Australia's largest and most representative business network. We facilitate meaningful conversations between our members and federal government – combining the benefits of our expansive network with deep policy and advocacy knowledge. It's our aim to make Australia the best place in the world to do business. ACCI membership list can be viewed at www.australianchamber.com.au/membership/current-members/

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