



Activate AUSTRALIA'S SKILLS



Inquiry into the value of skilled migration to Australia – Activate Australia's Skills Submission

Four costed solutions to make overseas skills and qualifications
recognition faster, fairer and more affordable

Prepared by Settlement Services International
on behalf of an alliance of 130+ organisations



Introduction

The Activate Australia's Skills campaign is an alliance campaign of over 130 businesses, unions, social services and community organisations working to reform the skills and qualifications recognition system in order to address the shortages crippling Australian communities, families and businesses. The campaign is convened by Settlement Services International (SSI).

One-third of all occupations in Australia are in shortage, and two-thirds of these have licensing requirements. Persistent workforce gaps are acting as a handbrake on productivity and economic growth. Despite chronic skill shortages, there are 253,000 permanent migrants in Australia with qualifications in accredited or licensed professions who are working below their skill levelⁱ. The process to get overseas skills and qualifications recognised is expensive, confusing, time-consuming and often unfair, with limited to no accountability to ensure authorities are meeting industry needs.

If underutilised migrants were able to work in their fields, shortages across critical services and industries would ease substantially. Australia could immediately gain up to 20,000 teachers, 50,000 engineers, 16,000 nurses, 5,000 psychologists and 1,300 electricians already living here but working outside their industries or below their skill level. Unlocking this workforce would boost productivity, reduce class sizes, shorten waiting lists and improve essential services, with additional nurses alone enabling care for 22,800 more hospital patients. On average, each underutilised migrant who returns to their accredited profession through a better skills-recognition system delivers a productivity gain of \$42,580 per yearⁱⁱ.

By easing the bottlenecks that are slowing the efficient deployment of skilled migrant labour, the Government has an opportunity to address critical skill shortages, boost productivity across the Australian economy and reduce migrant unemployment, underemployment and underutilisation by enabling more migrants to fully live up to their potential.

Skills recognition reform was one of the strongest areas of consensus at the Treasurer's Economic Reform Roundtable in August 2025, backed by unions, industry, and the community sector, and identified by the Treasurer among the ten priority outcomes for national productivity reform. This consensus was reaffirmed at the Council on Federal Financial Relations meeting in November 2025 when Treasurers nation-wide agreed to prioritise work on recognising skills, including better linking occupational licensing with skills assessment for migration, improving the timeliness of migrant skills assessments, and providing support to help migrants navigate the skills recognition systemⁱⁱⁱ. This inquiry is an opportunity to affirm this ever-growing consensus around these reforms by recommending the Government take action to make Australia's skills-recognition system faster, fairer and more affordable.

About this Submission

This submission outlines four practical, evidence-based solutions to improve Australia's overseas skills and qualifications recognition system, drawing on international best practice. The four solutions are not isolated – they are part of a holistic proposal to reform Australia's bureaucratic and expensive system for recognising overseas skills and qualifications.

Rather than introducing industry-specific fixes that risk adding further complexity and fragmentation, these solutions are system-wide to address the root causes of failures in Australia's skills and qualifications recognition system. They focus on getting the policy settings



and incentives right to create a system of continuous improvement, where barriers to fairness, affordability and efficiency are routinely identified and addressed — maximising outcomes for industry, the economy and qualified migrants alike.

These proposals are supported by more than 130 organisations which form part of the Activate Australia's Skills campaign, including businesses, unions, social services and community organisations. Activate Australia's Skills is an alliance campaign advocating for reforms to improve skills and qualifications recognition policy in order to address the shortages crippling Australian communities, families and businesses. The campaign is convened by SSI.

Response to Terms of Reference

a) The ongoing economic, social and cultural value of skilled migration to Australia;

The economic, social and cultural value of skilled migration to Australia is profound, enduring and foundational to the nation's prosperity. Modern Australia is a nation built through migration, and skilled migration sits at the core of that. Skilled migrants have long contributed to Australia's productivity, innovation and economic activity, filling vacancies across priority industries with critical skills shortages while fostering a modern, resilient economy and a vibrant, multicultural society. Importantly, skilled migration does not solely fill vacancies, it also accelerates capability and enhances Australia's global competitiveness by bringing diverse experiences, expertise, perspectives and talents to Australian workplaces.

Skilled migrants play a vital role in building cohesive, diverse and vibrant communities in Australia. They bring expertise, cross-cultural insight and global networks that enrich Australian workplaces, educational institutions and civic life for example through volunteering in the community or contributing to professional associations. Migrants enhance Australia's creative sectors, culinary industries, scientific research, and cultural institutions, feeding a society that benefits from a diversity of perspectives. From the social and cultural perspective, skilled migration has cemented Australia's identity as a modern, inclusive, global citizen.

The economic contribution skilled migrants have made to Australia are extremely well-documented. As the Review of the Migration system led by Martin Parkinson (the Parkinson Review) noted, the economic value brought about by skilled migration has been monumental: *"Despite Australia comprising only 0.3 per cent of the world's population, 2.8 per cent of the world's immigrants live here.² There are now, as a proportion of the population, more people living in Australia who were born overseas than at any other time in the last 130 years. This is part of the Australian success story and deserves to be celebrated. The contribution of migrants has built the richly diverse, dynamic and multicultural Australia of today. It is no easy feat to incorporate people from all over the world into one country and for the end result to be socially cohesive and economically prosperous.*

Migration has also been critical to driving economic prosperity. From the mid-1990s to the mid-2000s, the share of skilled migrants in our annual intake doubled. This coincided with Australia's economic miracle: from 1991 onward, Australia enjoyed the longest running period of continuous economic growth on record anywhere in the world."^{iv}

Additionally, the Treasury and Department of Home Affairs conducted joint research in 2017 to inform discussion and debate about population and immigration found that Australia, migration and economic conditions have moved together:



“considerable evidence pointing to the role of migrants in sustaining or fostering strong economic growth over the longer term. The 2015 Intergenerational Report (Australian Government 2015) estimated that, over the 40 years to 2015, population factors contributed almost 18 per cent of the 1.7 per cent annual average growth in GDP per person. This was mainly due to the growth in the working age share of the population. This suggests that migration helped the economy successfully weather the Global Financial Crisis and the slow global growth and poor economic conditions that followed.

Migrants, particularly skill stream migrants who account for around 70 per cent of Australia’s migrant intake, contribute to GDP per person in a number of ways. They offset Australia’s ageing population, improve labour force participation and productivity, and help businesses to source skills that are difficult to develop at short notice.

Unemployment among skilled migrants is low. The unemployment rate of the skill stream (including both primary and secondary applicants) is comparable to unemployment rates in the general population after migrants have been in Australia for only 18 months (DIBP 2016c).

Skill stream migrants are also estimated to contribute more to government revenue through taxation than they receive through government services and benefits. Even migrants in the family stream, who are not brought into Australia for their skills, are estimated to have a positive fiscal impact over their lifetimes, provided that they arrive relatively early in their working life.

In addition, the increased diversity that migrants bring is likely to play an important role in helping Australian businesses to innovate in the face of intensified global competition and technological change.

Looking more broadly across both migrant incomes and expenses, migrants are estimated to have a positive fiscal impact since they are predominantly of working age when they arrive. This means that they arrive in Australia at a time in their lives when their taxable income is usually highest and usage of government services such as health, education and aged care is usually lowest.

An assessment of the fiscal impact on the Commonwealth’s Budget of the 2014-15 migrant cohort estimated a net positive impact over the migrants’ lifetimes (Deloitte Access Economics & DIBP 2016) (Figure 28). The magnitude of this impact varies by visa type:

Permanent skill stream migrants were also estimated to deliver a large positive net fiscal impact (\$6.9 billion).^v

Skilled migration is not just a strategic labour market mechanism, but a national asset. Strengthening pathways for skilled migrants to live, work and play in Australia and improving the recognition of their skills and qualifications will continue to deliver substantial economic value while enriching Australia’s social cohesion and cultural dynamism.

b) The effectiveness of current skilled migration settings in meeting the current and future needs of the states and territories, while recognising the ongoing need for housing and infrastructure;

c) The scope to more effectively target skills gaps and shortages in critical sectors to improve services that benefit Australian communities;

Currently 620,000 permanent migrants (44%) in Australia are working below their level of skill or qualification, two thirds of whom came through the skilled migration program^{vi}. Reforming the overseas skills and qualifications recognition system would assist Australia’s skilled migration program to help end the underutilisation of skilled migrants in Australia and address skills gaps and shortages in critical sectors more effectively, boosting both productivity and workforce participation.



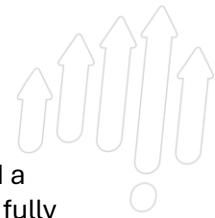
Chronic workforce shortages across the economy are limiting the productivity potential of businesses. Jobs and Skills Australia estimates that one-third of all occupations in Australia are in shortage, and two-thirds of these have licensing requirements^{vii}. Persistent workforce gaps are acting as a handbrake on productivity and economic growth in Australia. Despite these chronic skill shortages, there are 253,000 permanent migrants in Australia with qualifications in accredited or licensed professions who are working below their skill level. The process to get overseas skills and qualifications recognised is expensive, confusing, time-consuming and often unfair, with limited to no accountability to ensure authorities are meeting industry needs.

Many shortages are in fields with rising demand or acute need including healthcare, aged care, education, childcare and construction^{viii}. The prevalence of licensed occupations on shortage lists is highest in the Australian Capital Territory, Tasmania and South Australia. Across all states and territories, skills gaps also mean that many important infrastructure and housing projects are delayed or scaled back, contributing to Australia's deepening housing crisis. In fact, labour shortages are one of the biggest drivers of cost blowouts and time delays in construction, a sector already under immense pressure amid Australia's national housing crisis.

According to Deloitte Access Economics, there are 18,400 permanent migrants in Australia with building and construction-related qualifications who are working below their skill level^{ix}. The main barrier is Australia's costly, confusing and time-consuming approach to recognising overseas skills and qualifications. On average, each skilled tradesperson builds 2.4 houses per year. That means the underutilisation of qualified migrant workers is costing Australia at least 30,000 homes annually — homes that could ease the housing shortage for families, renters and communities across the country. As CEO of Master Builders Australia Denita Wawn said: "Harnessing the skills of overseas-trained workers is critical to addressing Australia's housing crisis. Yet to work in many roles in construction, they have to endure lengthy, expensive and complex skills assessment processes. For many, this results in them working below their skill level or not in the industry at all. This is a loss to building and construction and Australia as whole." Moreover, BuildSkills Australia – formed by the federal government to work with industry to address workforce issues in construction, property and water industries – reported that 90,000 new workers were needed to build 60,000 new homes across Australia each quarter, to reach the federal government's target of 1.2 million new homes in the next five years^x.

For regional and rural Australia, the impacts of underutilising skilled migrants are more significant, particularly as the local population ages and regions struggle to find new skilled workers to replace retiring professionals. According to analysis by the Regional Australia Institute, there were 70,000 job vacancies in regional Australia in July 2025. The top three occupational categories for job vacancies were professionals (27%), technicians and trade workers (16%) and clerical and administrative workers (13%)^{xi}.

If underutilised migrants were able to work in their fields, shortages across critical services and industries would ease substantially. Australia could immediately gain up to 20,000 teachers, 50,000 engineers, 16,000 nurses, 5,000 psychologists and 1,300 electricians already living here but working outside their industries or below their skill level. Unlocking this workforce would boost productivity, reduce class sizes, shorten waiting lists and improve essential services, with additional nurses alone enabling care for 22,800 more hospital patients. On average, each underutilised migrant who returns to their accredited profession through a better skills-recognition system delivers a productivity gain of \$42,580 per year^{xii}.



As Australia navigates the pressures of rapid technological change, global instability, and a population that is growing and ageing it is more important than ever to attract, retain and fully utilise skilled migrants in the Australian economy. Australia must stand out in the global contest for talent, and to do that we must ensure the full potential of our skilled migration program is realised and address the widespread underutilisation of the skilled migrant workforce already in Australia.

d) The scope for skilled migration settings to more effectively support Australian businesses, boost productivity and encourage innovation:

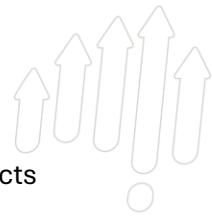
For the skilled migration system to deliver on the labour mobility outcomes Australia needs, the bottleneck of overseas skills and qualifications must be addressed. Without reforming our overseas skills and qualifications recognition system, adjusting settings like ratcheting the migration intake numbers up or down and changing the Priority Migration Skilled Occupation List will not address critical shortages in the labour market.

Multiple factors contribute to the migrant skills mismatch: lack of social capital and networks; language barriers; limited local work experience; and discrimination and bias in recruitment processes. However, one key structural driver is Australia's system for recognising overseas skills and qualifications, which the 2023 Migration System Review described as a "fraught system" that is "complicated, expensive and lengthy" ^{xiii}.

Around 253,000 permanent migrants in Australia have skills and qualifications in regulated or licensed professions but are currently working below their skill level. A key driver of this mismatch is Australia's costly and confusing system for recognising overseas-acquired skills and qualifications. The process is time-consuming, expensive, inconsistent and opaque, with little to no oversight of the many bodies and associations that conduct overseas skills recognition. Many barriers are unrelated to the individual's actual skills or experience and include:

- **Duplicative, disjointed requirements:** skills recognition for the purposes of obtaining a skilled visa is disconnected from recognition for employment and licensing purposes once a migrant arrives in Australia. This causes confusion, delays and duplication.
- **Excessive fees and slow processes:** costs and recognition timeframes vary between occupations but can be prohibitive. For skilled trades, the skills recognition process can cost more than \$9,000 and take up to 18 months^{xiv}. For overseas-trained general practitioners, the process can take 35 to 130 weeks to be able to practise in Australia and cost up to \$51,000^{xv}. In dentistry, the cost for registration costs roughly \$8,000^{xvi}. There is currently no national subsidy loans scheme to help cover these costs.
- **Lack of clear, consistent information:** the current system for recognising overseas skills and qualifications for both migration and employment spans over 650 occupations and more than 70 assessing and licensing authorities. There is no central source of information or guidance on how to navigate this complex system.
- **Lack of transparency and accountability:** with no national oversight, each assessing authority or licensing body operates within its own framework, setting different prices, documentation requirements and processing timelines. There is no avenue to independently appeal recognition decisions.

These barriers have a twofold impact: migrants are prevented from fully applying their expertise and Australia misses opportunities to lift workforce productivity and fill skill shortages. Enabling underutilised migrants to work in their regulated professions would deliver an average



productivity boost of \$42,580 per worker each year. This would have positive flow-on effects throughout the economy – at the household, industry and national levels.

If underutilised migrants worked in their fields, then it would substantially reduce shortages in critical services and industries and enable migrants to do the jobs they have trained for. Australia would benefit from adding 20,000 teachers, 50,000 engineers, 16,000 nurses, 5,000 psychologists and 1,300 electricians, for example. Harnessing the skills of this untapped workforce would reduce class sizes, shorten waiting lists and improve services, with additional nursing staff alone enabling care for 22,800 additional hospital patients.

Making overseas skills and qualifications recognition faster, fairer and more affordable would enable more people to fully use their skills, broaden economic participation, and reduce migrant unemployment, underemployment and underutilisation. Based on an analysis of reforms that have worked effectively in comparable countries overseas such as Germany and Canada, it is recommended the Australian Government implement four practical solutions to address unnecessary barriers to skills recognition while maintaining existing high standards. These are outlined below and are endorsed by more than 130 organisations as part of SSI's Activate Australia's Skills campaign.

Implementing the solutions proposed by Activate Australia's Skills

The Activate Australia's Skills campaign, convened by Settlement Services International, has put forward four practical, evidence-based solutions to improve Australia's overseas skills and qualifications recognition system, drawing on international best practice:

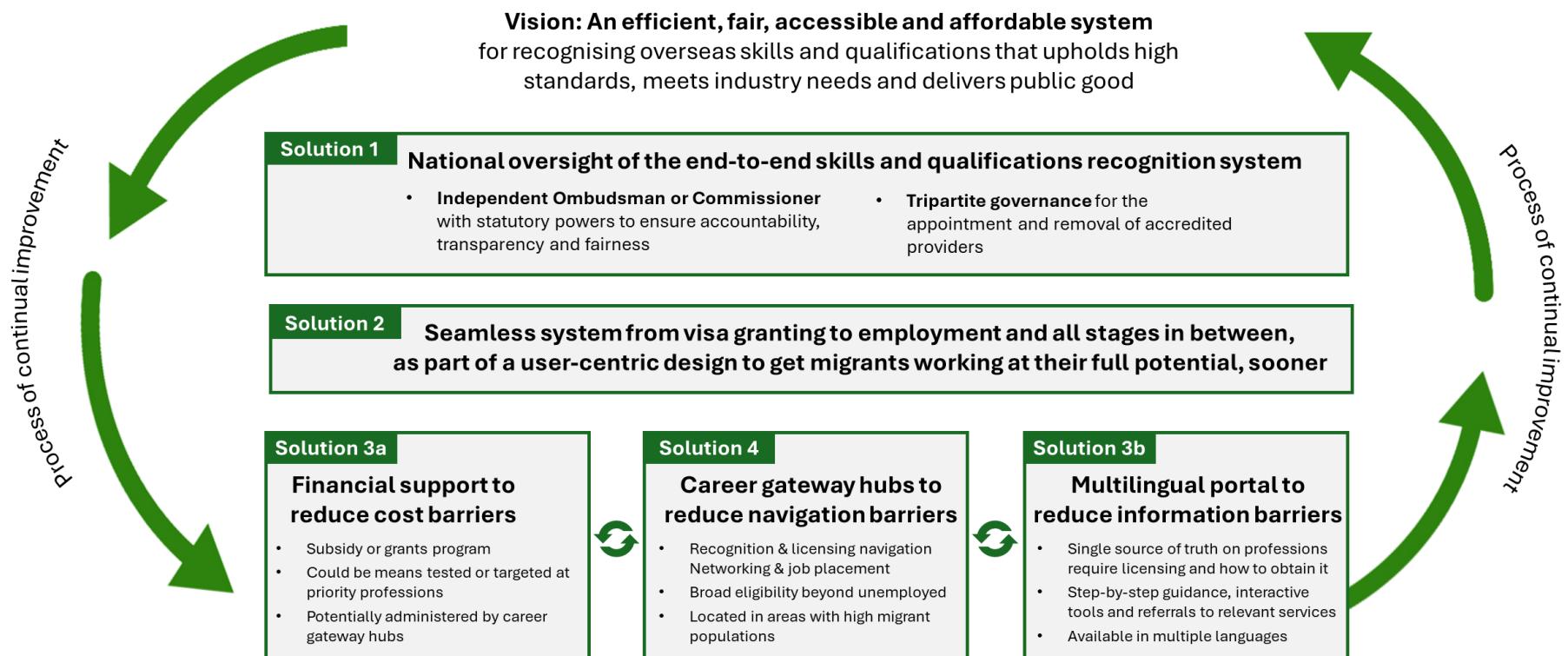
- 1. Establish national oversight:** Create one national governance framework for all overseas skills and qualifications recognition, supported by an independent Commissioner/Ombudsman with regulatory powers to ensure efficiency, fairness, affordability and accountability.
- 2. Create a more seamless system:** Integrate skills recognition for migration with licensing and accreditation for employment, removing duplication and streamlining pathways for skilled migrants to work in their professions.
- 3. Reduce unnecessary barriers:** Provide targeted financial assistance to reduce cost barriers and develop a comprehensive online portal as a trusted and centralised source of information to reduce confusion.
- 4. Rollout Career Gateway Hubs:** Establish career gateways – accessible, place-based employment hubs with broad eligibility – where specialist skills recognition navigators guide migrants through the recognition and licensing process and connect qualified workers with roles that match their skills.

Each of these solutions is outlined below, with a focus on practical considerations for implementation.



Plan on a page: Four integrated solutions to make overseas skills recognition faster, fairer and more affordable

The four proposals form an integrated, holistic framework for reforming overseas skills and qualifications recognition at the systems level. Rather than introducing industry-specific fixes that risk adding further complexity and fragmentation, these solutions are system-wide to address the root causes of failures in Australia's skills and qualifications recognition system. It focuses on getting the policy settings and incentives right to create a system of continuous improvement, where barriers to fairness, affordability and efficiency are routinely identified and addressed — maximising outcomes for industry, the economy and qualified migrants alike.





Solution 1: Establish national oversight through accountability and transparency mechanisms covering all relevant processes and industries

Purpose: To improve the efficiency, fairness and affordability of the end-to-end overseas skills and qualifications recognition system, while removing unnecessary barriers to international and intra-state labour mobility without reducing quality or confidence in the system.

Rationale: Currently, no single body is responsible for governing or monitoring the full skills recognition and professional licensing ecosystem. This has led to duplication, inconsistent standards, high costs, long delays and opaque processes, producing uneven and often unfair outcomes. There is limited data transparency — no consolidated view of assessment costs, timeframes or success rates across occupations and jurisdictions — because no entity is accountable for ensuring that the system operates efficiently, effectively or equitably.

Description: A single national governance system should be implemented to oversee the end-to-end process for recognising overseas skills and qualifications, ensuring consistency, fairness and due process for migration and employment purposes. The oversight body would identify systemic barriers and coordinate reforms through a tripartite approach involving government, industry and unions. Building on existing structures such as Jobs and Skills Australia, the mechanism for driving continual improvement would: pinpoint blockages affecting workforce supply in priority sectors and work to resolve them without impacting quality standards; facilitate the harmonisation of licensing across jurisdictions; and identify and address training, education and recognition of prior learning (RPL) barriers through tripartite collaboration. This approach would strengthen transparency and accountability, uphold quality standards, and safeguard public and industry confidence in the system.

Mechanism: The preferred model is to establish an independent national Skills Recognition Ombudsman or Commissioner, similar to Canada's Fairness Commissioner model. The Ombudsman or Commissioner would have the statutory power and resources to:

- collect, analyse and publish system-wide data on assessment timelines, costs, and recognition rates;
- monitor and report on systemic risks, inconsistencies and emerging issues;
- hold assessing authorities accountable for meeting government-mandated recognition standards and timeframes;
- review assessment and recognition decisions for reasonableness and fairness; and
- ensure transparency and accountability in the overall conduct and operations of accrediting authorities.

This would involve compulsory data collection across the system (from accreditation, licensing, industry, RPL, training bodies and state-run bodies) to identify inefficiencies and drive continuous improvement. These functions would be exercised collaboratively, using data insights and stakeholder input to promote ongoing reform. Enabling legislation would likely be required to grant the requisite powers to the Commissioner/Ombudsman to carry out these duties.

In terms of the machinery of government, there are several options. The Commissioner/Ombudsman could be a statutory appointment with a stand-alone office housed within the Department of Employment and Workplace Relations or Jobs and Skills Australia (for example, an independent 'Office of the Skills Recognition Commissioner/Ombudsman'). Alternatively,



the role could carry a dual mandate, serving as both Deputy Commissioner of Jobs and Skills Australia and Ombudsman, or be embedded within the Fair Work Commission. It is recommended the Commissioner/Ombudsman be established within Jobs and Skills Australia where its function would best align with the skills mandate and the agency's tri-partite architecture. This approach aligns with the *Migration, Pathway to Nation Building* inquiry which recommended that "the Australian Government considers providing Jobs and Skills Australia the statutory power to oversee the work of Australia's skills assessment authorities and also provides an appeal mechanism for skills assessment decisions."^{xvii} In this case, the powers of the Commissioner/Ombudsman should be assigned to the Jobs and Skills Australia Commissioner.

To complement the Commissioner/Ombudsman's role, a tripartite model will be utilised bringing together industry, government and unions is recommended to ensure the system remains fit for purpose and trusted by all stakeholders. This could involve expanding the mandate of Jobs and Skills Councils to accredit skills assessment organisations (such as Registered Training Organisations) to strengthen quality assurance and eliminate unreliable or potentially exploitative providers. In parallel, the mandate of Jobs and Skills Australia could be broadened to provide oversight of recognition processes in occupations not currently covered by existing Jobs and Skills Councils, ensuring comprehensive national coordination and consistency.

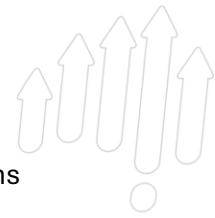
Scope: The Ombudsman or Commissioner would have oversight of the end-to-end system, including assessing authorities for both migration and employment purposes. This would include oversight of the 39 assessing authorities for skilled migration, eight skilled migration assessors for trades, and 30+ professional and regulatory agencies responsible for occupational licensing and registration across states and territories. Under this single governance system, there would be recognition of differences between occupations/trades that are legislated (i.e. Medicine), self-regulated (i.e. Engineering) or unregulated (i.e. Marketing), but it would ensure that all types can be held accountable.

Recommended expansion to the functions of Jobs and Skills Australia to enable implementation of Solution 1

We recommend broadening the mandate and functions of Jobs and Skills Australia (JSA) to provide oversight of overseas skills and qualifications recognition to ensure the system meets Australia's current and future workforce needs, specifically:

- 1. Expand JSA's functions to cover skills recognition oversight:** We recommend amending Section 9 of the JSA Act to extend JSA's mandate to cover advice on and independent oversight of overseas skills and qualifications recognition and professional licensing systems. As the Consultation Paper for the review of the *Jobs and Skills Australia Act 2022* outlined, JSA currently has "very limited direct oversight of levers to improve labour market outcomes in Australia."^{xviii} Expanding its functions to include oversight of skills recognition and professional licensing would give JSA meaningful levers to identify and address structural blockages that prevent skilled migrants from contributing at their full capacity.

To this end, Section 9a on advice to the Minister or the Secretary should be amended to include advice on these two additional areas:



- a. The continual improvement of Australia's overseas skills and qualifications recognition and professional licensing system to uphold standards while addressing systemic issues and meeting Australia's workforce needs
- b. The harmonisation of professional licensing requirements across states and territories to reduce duplication and improve mobility of skilled workers.

Alongside this, we recommend Section 9 of the JSA Act also give JSA the powers to fulfil the following oversight function:

- a. To provide independent oversight of entities involved in Australia's overseas skills and qualifications recognition and professional licensing system, including compelling data collection on assessment timelines, costs and recognition rates; monitoring and reporting on systemic risks; and ensuring transparency, affordability, efficiency, accountability and fairness in the conduct of accrediting authorities.

These amendments would close a longstanding accountability gap by ensuring a single national body is responsible for monitoring and improving system performance, in partnership with regulators, Jobs and Skills Councils, and professional bodies.

2. Expand mandated deliverables of JSA to include an annual report on the state of overseas skills and qualifications recognition and professional licensing in Australia: To promote accountability and transparency, we recommend expanding JSA's mandated deliverables to include an annual public report on the state of overseas skills and qualifications recognition and professional licensing in Australia.

This report should include:

- a. A risk-based assessment of accrediting authorities' performance.
- b. Analysis of key metrics such as processing times, costs, recognition rates, and appeals.
- c. Identification of systemic barriers to fairness and efficiency.

Such reporting would increase transparency, strengthen incentives for continuous improvement, support evidence-based reform, and help governments and industry identify where targeted interventions are needed most.

3. Amend Section 13A to Appoint a Deputy Commissioner for Skills Recognition and Licensing: We recommend amending Section 13A of the Act to enable the appointment of up to three Deputy Commissioners, with the third Deputy Commissioner dedicated to leading work on overseas skills recognition and professional licensing. This role would ensure strong leadership and accountability for this expanded scope, provide expert oversight, and support collaboration across Commonwealth, state and territory governments, regulators, and industry stakeholders.

4. Expand the mandate of JSCs' accreditation powers to strengthen quality assurance: To improve the quality and integrity of assessments, we recommend expanding the mandate of Jobs and Skills Councils (JSCs) to include the accreditation of Registered Training Organisations (RTOs) and provision of advice on the accreditation of Skilled Migration Assessing Authorities (SMAAs). Under sub-regulation 2.26B(1BG) of the Migration Regulations 1994, the Minister for Skills and Training can revoke an Assessing Authority's approval. Having JSCs involved in accreditation would strengthen



quality assurance mechanisms, help eliminate unreliable or exploitative providers, and ensure that assessments are consistent, fair, and aligned with industry needs standards.

5. **Expand the coverage of JSCs or the mandate of JSA across all accredited occupations:** Many industries and occupations are not currently covered by an existing JSC. To ensure comprehensive system oversight, we recommend expanding the coverage of JSCs or, alternatively, authorising JSA to accredit or revoke Registered Training Organisations (RTOs) and provide advice on Skilled Migration Assessing Authorities (SMAAs) in uncovered sectors or industries. This would ensure a consistent national approach, remove regulatory blind spots, and support migrants seeking recognition in less-regulated or emerging industries.
6. **Continue collaborative development of an annual workplan:** We support the continued development of an annual JSA workplan, setting out JSA's priorities and areas of focus for the financial year. JSA should continue to engage its tripartite partners—government, unions, and industry—alongside broader stakeholders, including community organisations and migrant representatives, to ensure the workplan reflects national workforce needs and equity considerations. Through SSI, the convenor of Activate Australia's Skills, we have valued participating in the annual work planning process and having the opportunity to shape and inform JSA's priorities.
7. **Continue targeted studies on individual cohorts:** JSA should continue to conduct targeted studies on cohorts that have historically faced labour market disadvantage, particularly migrants, refugees and people from culturally and linguistically diverse backgrounds. By embedding this focus in its ongoing research program, JSA can help identify persistent barriers, track progress over time, and inform reforms that unlock the full potential of Australia's diverse workforce

Why a system-wide solution is needed

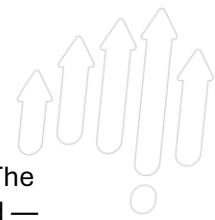
The barriers in Australia's skills recognition system – excessive fees, opaque processes, inconsistent standards, and confusing information – are not confined to any one sector. They are endemic across the system. This is a systemic problem, and systemic problems demand systemic reform. The solutions proposed in this policy platform are scalable and industry-agnostic. They focus on creating the right governance, incentives and accountability mechanisms to make the system faster, fairer and more transparent for all migrants — regardless of their occupation. This will have flow-on effects for all sectors, including where skills shortages are most acute such as health, construction and education.

Case study: Office of the Fairness Commissioner (Ontario, Canada)

The Office of the Fairness Commissioner (OFC) in Ontario is a leading international model of how independent oversight can make professional recognition systems fairer, faster and more transparent.

Established under the *Fair Access to Regulated Professions and Compulsory Trades Act 2006*, the Fairness Commissioner works with occupational regulators to ensure registration practices are accountable and impartial. The Commissioner reports to the Minister for Labour (similar to the Employment and Workplace Relations portfolio in Australia).

Originally focused on fairness, the OFC's remit now includes labour mobility and workforce planning. It also advises on education and training alignment to address skills shortages — for



example, ensuring universities offer sufficient places in professions such as optometry. The Commissioner can order fair access, refer systemic issues to the Minister for reform, and — where needed — the Government can override self-regulation to meet public policy goals. Professions must also process recognition applications within four months unless health or safety concerns apply.

Oversight is guided by a Risk-Informed Compliance Framework (RICF) focusing on higher-risk regulators. Each must submit an annual Fair Registration Practices report, published publicly within 30 days. This transparency creates strong reputational incentives and drives gradual, system-wide improvement. When barriers are identified, these are addressed through two main routes:

- Individual statutes (legislation or regulations) for bodies to achieve public policy goals (e.g. faster, fairer, cheaper recognition of individual or multiple professions).
- By-laws issued by the Fairness Commissioner in Ontario (or another example is the Superintendent of Professions in British Columbia) to specific professions to address barriers to recognition.

Ontario and other provinces using this model have achieved measurable improvements in recognition outcomes. In Manitoba, where a similar Fairness Commissioner was established in 2009, professional registration rates for overseas-trained workers nearly doubled, increasing from 25% in 2012 to 45% in 2020.

The Fairness Commissioner model provides several key lessons for Australia:

- Independent oversight improves accountability and transparency.
- Risk-based monitoring fosters continuous improvement and sector ownership.
- Strong ministerial links enable government to act where systemic barriers persist.
- Public reporting and mandated timelines drive fairer and faster outcomes.

Solution 2: Create a more seamless system from the point of view of the migrant

Purpose: To establish an integrated, end-to-end process that supports migrants from visa granting through to employment, ensuring a clear, coordinated and efficient pathway into work that matches their skills and qualifications.

Rationale: Currently, skills and qualifications assessments for migration purposes are separate from those required for employment and professional licensing. This disconnect creates confusion, duplication and delays. Many migrants assume their migration skills assessment also qualifies them to work in their profession, only discovering otherwise after arrival. The lack of coordination and communication between migration, licensing and employment systems results in frustration, wasted effort and lost productivity.

Description: A reformed system would treat the journey from visa to employment as one seamless process with greater coordination between migration assessors, licensing authorities and employers. Aligning these processes would ensure skilled migrants transition into their professions more quickly, allowing Australia to capture their full economic contribution sooner. While migration and employment requirements may differ, these differences must be communicated clearly and upfront, so that recognition pathways are clear.

Features: Delivering a seamless system requires cross-portfolio collaboration and removal of siloed responsibilities, so that migration, skills and employment processes function as a single,



connected service rather than a series of disjointed steps. For example, licensing requirements for a migrant's profession should be communicated at the visa approval stage, rather than leaving migrants to discover and navigate them after arrival. The lead agency responsible for coordinating the seamless system and identifying blockages would be the same agency in which the Commissioner/Ombudsman is situated.

Scope: Creating a more seamless system applies to all migrants with qualifications in accredited professions who are eligible to work in Australia, regardless of visa type. Access to skills recognition and associated supports should be universal and visa-agnostic, recognising that many highly qualified migrants enter Australia through secondary, family or humanitarian streams as well as through skilled migration, and that Australia should create a system that ensures every person can contribute to our workforce, economy and society to their full capacity.

Specific proposals are outlined below, but these are envisioned as part of one integrated seamless system. Each intervention should be user-centred, designed with overseas-qualified professionals in mind.

Solution 3: Make the system affordable and accessible

Solution 3a: Financial support to reduce cost barriers

Purpose: To reduce cost barriers so more migrants can go through the skills recognition system.

Rationale: Application fees and costs to get overseas-acquired skills and qualifications assessed can be prohibitively high (e.g. up to \$51,000 for GPs, \$8,000 for dentists, \$9,000 for skilled trades). There is currently no national subsidy or loan scheme to support newcomers with these costs. High costs mean some migrants don't even apply to get accredited, while others spend years and months saving, during which they become de-skilled or lapse time-sensitive practicing requirements.

Description: Offer financial support for individuals requiring financial assistance to obtain overseas skills and qualifications recognition in regulated professions. This measure will complement the role of the oversight mechanism or Commissioner/Ombudsman which will ensure that fees charged by professional associations and accrediting bodies are reasonable and cost reflective. This will place downward pressure on costs across the system. Nevertheless, some financially disadvantaged people will still require financial support to go through the skills recognition process, in which situations the government should provide financial support to ensure financial barriers do not inhibit individuals from fully contributing to the economy.

Scope: Financial support could be means-tested and/or targeted to support migrants qualified to work in specific accredited professions with acute shortages. A subsidy or grants program would be readily scalable and could be ramped up depending on demand.

Solution 3b: Multilingual skills recognition portal

Purpose: To create a single source of truth on which professions in Australia require accreditation or licensing, and how to obtain it – improving efficiency, reducing exploitation and enabling migrants to work at their full potential sooner.



Rationale: Currently, no central or authoritative platform exists to help migrants identify whether their profession is regulated, or which authority they must contact for registration or recognition. This fragmentation creates confusion, delays, unnecessary costs, and exposes migrants to exploitation by unqualified intermediaries offering misleading services.

Description: The Skills Recognition Portal would serve as a comprehensive, user-friendly one-stop shop for information on how to get overseas skills and qualifications recognised in certain states/territories and professions, with referrals to relevant support services. It would include step-by-step guidance, interactive tools and referrals to relevant support services such as Career Gateway Hubs and financial support. To ensure accessibility, the portal would be available in multiple languages, designed to meet the needs of culturally and linguistically diverse users.

Scope: The portal would ultimately cover all professions, clearly distinguishing between regulated and unregulated occupations. It could be implemented in stages, beginning with priority sectors facing critical workforce shortages, before expanding to encompass all professions and jurisdictions over time.

Case study: “Anerkennung in Deutschland” – Recognition in Germany portal

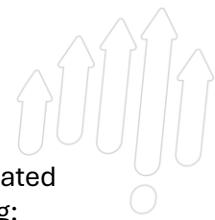
Germany’s multilingual skills recognition portal features an innovative ‘Recognition Finder’ tool that allows applicants to enter their profession and location to automatically receive tailored, step-by-step guidance on how to have their skills and qualifications recognised. The portal, designed to reflect Germany’s federated labour market, provides information on around 500 regulated professions, including doctors, nurses and teachers. It also includes a built-in referral service that connects users directly to their nearest recognition advice centre for personalised support. Within four years of its launch, the number of foreign qualification recognition applications in Germany more than doubled — demonstrating the powerful impact that clear, accessible information can have on participation and outcomes.

Solution 4: Rollout Career Gateway Hubs with skills recognition navigators

Purpose: To provide overseas-trained workers with personalised guidance and integrated employment support so they can gain recognition and work at their full potential as soon as possible, maximising benefits to the economy.

Rationale: Despite being an incredibly complex process to navigate, there is currently no national service dedicated to helping overseas-trained workers navigate the system for skills and qualifications recognition or to connect skilled migrants with jobs that match their expertise.

Description: Establish specialist, place-based employment hubs – or “career gateways” – in areas with high migrant populations to guide workers through the recognition process and then into jobs aligned with their skills and qualifications. These hubs would include skills recognition “navigators” to provide personalised guidance through the recognition process alongside wrap-around employment services located in one place. Eligibility would extend beyond the unemployed, ensuring overseas-trained professionals working below their skill level or outside their field can also access support. This would include those who have lived in Australia for some time and may not be receiving income support, to entry-level job seekers to mid- and senior-level professionals seeking to continue their careers.



Features: As an integrated initiative, the career gateways would feature a range of co-located services to help overseas-trained workers achieve their full economic potential, including:

- recognition and licensing navigation support through dedicated case worker ‘navigators’;
- specialised training to bridge cultural and language barriers to gaining employment;
- job placement, networking, mentoring and career advice programs; and
- education on workplace rights.

The hubs could also be integrated with other solutions outlined earlier, such as having a referral service to a local hub via the online recognition portal (Solution 3a) and/or administering recognition grants via hubs (Solution 3b).

The career gateway hubs could be piloted in a handful of metropolitan and regional areas to test models and provide a proof-of-concept prior to a national rollout.

Case study: Recognition advice centres in Germany

A similar model has worked effectively in Germany where advice service centres operate across all 16 states. These centres provide overseas-trained workers with personalised support including counselling on qualifications recognition, guidance on bridging courses, and access to mentoring and coaching. The advice centres are part of Network IQ – Germany’s flagship Integration through Qualification Program. The approach to skills recognition in Germany is underpinned by a robust legislative framework – the Recognition Act – which creates a legal right for individuals to have their overseas qualifications assessed and mandates recognition outcomes to be finalised within two to four months.

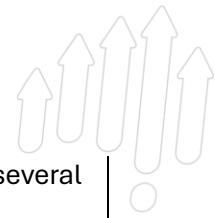
e) Strategies to enhance public awareness and understanding of the role of skilled migration in Australia; and

We strongly encourage this Committee to recommend the Government publicly support the Activate Australia’s Skills campaign and commit to reforming Australia’s skills and qualifications recognition system as soon as possible. Joining the over 130 organisations already endorsing the Campaign would amplify the public awareness raising already undertaken by the Campaign through holding public and community events and securing positive media coverage of the impact of skilled migrants on the Australian economy. Moreover, the resources produced by the Campaign, for example the Productivity Fast Track Report and the Billion Dollar Benefit Report, provide clear and compelling evidence for the benefits of fully realising the potential of Australia’s skilled migration. Finally, the human element of this story is extremely compelling and relatable, with many case studies of people with skills Australia needs unable to enter their profession and many working tirelessly to fully realise their potential:

Case study: Anam

When Anam migrated from Pakistan to Australia, with a Doctor of Pharmacy she earned in Peshawar, she was excited to utilise her skills and build a life for herself and her family. However, for over a decade, her passion for pharmacy, and the skills she brought with her sat idle, delayed by systemic barriers in Australia’s overseas skills recognition system.

Despite holding a pharmacy degree and years of experience, Anam was unable to practice in Australia for almost 11 years. Like many professional migrant women, she was ineligible for study allowances, childcare subsidies, and other supports available to citizens, making it nearly



impossible to meet re-registration requirements or gain local experience. She worked in several jobs she was overqualified for: cleaning and administration to make ends meet.

In July of 2024, Anam eventually succeeded in requalifying and now works as a pharmacist in regional Australia. However, she emphasises that the process of obtaining documents from Pakistan and navigating complex recognition pathways caused immense stress and financial strain. No one told her where to go, and when she knew where to go, there was always another step to take. Her experience highlights the urgent need for a fairer, faster, and more affordable overseas skills recognition system, ensuring that skilled migrants, particularly women, can work to their potential.

There are currently 2,560 overseas-trained pharmacist in Australia working below their skill level.

Case study: Abisha

Abisha moved to Australia from India in 2022 with a clear dream — to continue her career as a registered psychologist and contribute to improving mental health outcomes in her new community. Back home in India, she had completed both a Bachelor of Arts in Psychology and a Master's in Psychology.

However, upon arriving in Australia, Abisha was confronted by a complex, confusing, and costly accreditation system. The process to become a registered psychologist through the Australian Health Practitioner Regulation Agency (AHPRA) required multiple stages of assessment, extensive documentation, and thousands of dollars in fees. This proved daunting, especially as a recent migrant with limited financial support and no clear guidance on navigating the process. Determined to build a stable life and maintain her connection to her profession, Abisha decided to take a more immediate and affordable path. She began working in various unrelated roles, including administrative and support jobs, before transitioning to become a therapist and counsellor. While this work was meaningful, it was not the career she wanted. She explained that she chose this route because it was “quicker” and allowed her to “save money for [her] future AHPRA registration.”

Now, three years later, Abisha is revisiting her original goal. With a stronger financial foundation and greater familiarity with Australia’s systems, she has started the formal process of applying for registration through AHPRA. One of the biggest challenges she currently faces is obtaining and verifying the necessary academic documents from India, which has proven both time-consuming and expensive. The costs of assessment, registration, and additional bridging requirements remain a major barrier, but Abisha is determined to persevere.

“I’ve come too far to give up now,” she said. “Becoming a registered psychologist in Australia isn’t just about my career — it’s about fulfilling the purpose I set out for when I left home.”

There are 5,040 migrant psychologists who are working below their skill level in Australia who could help reduce wait times for Australians seeking mental health support if they were able to work in the professions they trained for.

f) Approaches taken in other countries with similar migration objectives.

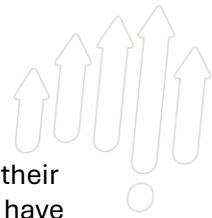


The four skills and qualifications recognition reforms called for by the Activate Australia's Skills campaign asks are based on international best practice, working together to form a holistic reform package, in particular Canada and Germany.

In Canada, to ensure procedural fairness, good governance and expediency for applicants undergoing a skills assessment process, regulatory bodies are implemented at the provincial level. This consists of Ontario, Newfoundland and Labrador and Manitoba Fairness Commissioner, the Court of Appeal of Quebec, Nova Scotia Fair Registration Practices Review Officer, British Columbia and Alberta Fairness Office, New Brunswick, Northwest Territories, and Yukon Ombudsman's Office, Prince Edward Island Ombudsperson, and Saskatchewan Fair Practices Office. These regulatory bodies are provided judicial power within their states under the Fair Access and Regulated Profession Act, 2006, to regulate the labour market and the assessment and registration activities of 40 professions requiring high-level skills^{xxix}. These bodies provide oversight over the registration process for skills assessment, conduct audits, ensure compliance, and provide advice to regional ministers, including the Minister of Citizenship and Immigration, about issues impacting registration processes for regulated professions^{xx}. These regulatory bodies have achieved significant success in ensuring greater procedural fairness and justice, which has contributed to greater support for applicants and professions regarding the recognition process and reduced time periods for assessment, with most professions producing outcomes within 0.1 to 5 years within 2011 to 2020 time period^{xxi}.

In comparison to the skills qualifications process in Canada, Germany adopts a streamlined qualification recognition process for both onshore and offshore applicants, with details about the process accessible through the government Recognition Portal website^{xxii}. The portal acts as a central website where candidates can access details about the qualification and skills recognition process, licensing requirements by industry bodies, appeals process, and details about employment counselling services available to assist candidates with their application^{xxiii}. Career counselling support is provided through a network called Network IQ (Integration through Qualification). These networks provide tailored consulting and guidance for migrants by developing educational materials that aid them in developing their German language skills, career guidance, information on the qualification assessment process, support to start businesses, and tailored vocational education and cultural education. Funded through the Federal Ministry of Labour and Social Affairs, this 7 million Euro annual program has efficiently contributed to integrating migrants into the labour force^{xxiv}. To access this support, candidates are required to pay a fee between 1.55 and 1.95 euros, although free access is given to candidates who are eligible for unemployment and social assistance benefits^{xxv}.

In 2012, the Recognition Act was implemented to improve the recognition process and make Germany attractive to skilled migrants, with the aim of addressing skills shortages^{xxvi}. The program, which is governed under the Recognition Act 2012, provides an opportunity for skilled migrants and refugees to undergo the process of recognising their qualifications in regulated occupations, although working permits are sufficient for unregulated fields such as trade and administrative work. To gain employment in regulated fields such as health, education and nursing, candidates must apply to the relevant authorised industry body to determine whether their qualifications and skills are equivalent to those required for practice in Germany. If successful, the candidate can gain employment in their field. Unsuccessful candidates are likely to receive one of two outcomes: an outcome indicating that their qualifications and skills sets are not equivalent to that required by industry standards in Germany, or they have met the industry standards, but are yet to meet the language and aptitude requirements to gain employment in their field. If candidates receive the first outcome, they can complete a



compensation measure (aptitude test, knowledge test, or engagement in employment in their relevant industry under supervision for a maximum of 3 years) before they are deemed to have achieved a standard equivalent to that required in industries in Germany. In the scenario where the outcome indicates that a candidate still needs to meet all requirements; candidates must show evidence that they know the German language and pass a personality aptitude test. They can also appeal the outcome of the recognition process by seeking legal redress or further advice from an employment counselling centre. Employment can be obtained in unregulated occupations that align with a candidate's skill set while awaiting the outcome of the appeal^{xxvii}.

Conclusion

The Committee has the opportunity to recommend to the Australian Government and Australian Parliament the above reforms to address structural barriers to the fair and full economic participation of refugees and migrants. Doing so will improve Australia's economic performance and productivity, help skilled migrants live up to their full potential and deepen a greater sense of shared belonging that comes with more fully participating in Australian society.



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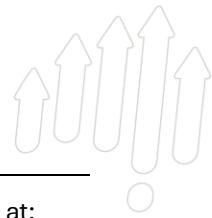
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