

# Public Consultation: A Migration System for Australia's Future

Submission by the  
Australian Physiotherapy Association (APA)

December 2022

**Authorised by:**

Anja Nikolic  
CEO  
Australian Physiotherapy Association  
Level 1, 1175 Toorak Rd  
Camberwell VIC 3124  
Phone: (03) 9092 0888  
[www.australian.physio](http://www.australian.physio)

## About Australian Physiotherapy Association (APA)

The APA vision is that all Australians will have access to quality physiotherapy, when and where required, to optimise health and wellbeing, and that the community recognises the benefit of choosing physiotherapy.

The APA is the peak body representing the interests of Australian physiotherapists and their patients. It is a national organisation with state and territory branches and specialty subgroups. The APA represents more than 31,000 members who conduct more than 23 million consultations each year. The APA corporate structure is one of a company limited by guarantee. The APA is governed by a Board of Directors elected by representatives of all stakeholder groups within the Association.

## Table of Contents

<b>1. Executive Summary</b>	<b>3</b>
Introduction .....	3
APA Position .....	3
Skilled stream of the Migration Program .....	4
Conclusion .....	5
<b>2. APA's response to the consultation questions</b>	<b>5</b>
1. What challenges and opportunities does Australia face in the coming decades? .....	5
2. How can migration contribute to these challenges and opportunities? .....	6
3. What are the barriers in allowing migration to play these roles? .....	7
4. What reforms are needed to ensure the migration system can meet the challenges and opportunities that lie ahead? .....	7
5. How do we further strengthen and maintain Australians' public confidence in the migration program? .....	7

# 1. Executive Summary

## Introduction

The Australian Physiotherapy Association (APA) welcomes the Australian Government's collaborative approach and commitment to reforming Australia's migration system. We thank the Government for its fast action to process the large visa backlog since coming to office and progressing broader reforms in this area. We welcome this opportunity to provide input to the migration program review process to ensure a more efficient migration system underpinned by fairness with the required inputs to direct a more strategic approach to migration and workforce planning.

Migration is central to Australia's future prosperity. The integrity of Australia's migration system is also essential to ensure our continued competitiveness in the pursuit of global talent, and the resultant rebuild following damaging pandemic-era border policies. Migration policy and program settings that support domestic employment must remain a central policy condition to growing a sustainable workforce and maintaining trust of the system. Therefore, we support the Government's commitment to a whole-of-government approach to a redesigned migration system. This will direct a more targeted approach to filling critical gaps in our labour force through skilled migration while maintaining a core focus on our domestic skills base.

## APA Position

The APA congratulates the Albanese Government on driving a transformative agenda to ensure relevant skills development. The recent Jobs and Skills Summit showed a commitment to working with key industry partners to ensure our migration settings are more closely aligned to future growth and skill development needs. The APA provided written input to the Issues Paper released just prior to the Jobs and Skills Summit, and, more recently, to the Employment White Paper. We note in your briefing that this policy development will be progressed concurrently to this review process. This will help prioritise setting the right skills through the right visa programs.

This submission builds on our earlier advice to these major associated reforms to provide more specific information on the barriers and enablers of the migration program on the health workforce and, in particular, in developing a sustainable physiotherapy workforce. In order to fit within the stipulated five-page limit, we have directed our input to the areas that would support a more strategic response to addressing health workforce barriers within the skilled stream. We have provided detailed advice specific to physiotherapy skilled migration system reform directly below, and welcome further opportunities to contribute to this reform process in future months.

The Australian Physiotherapy Council (Council) is the national assessing authority in Australia. The Council's submission will provide specific detail on their key role in conducting Skills Assessments on behalf of the Department of Home Affairs, and in assessing qualifications for the purposes of General and Limited Registration with the Physiotherapy Board of Australia.

## Workforce supply challenges

**For physiotherapy, as a highly feminised workforce, policy must address retention factors to build a sustainable workforce capable of addressing growing complexities in clinical care.**

The pandemic has worsened critical workforce shortages by limiting our ability to supplement the workforce through skilled migration. Physiotherapists report substantial unmet needs for physiotherapy services in the community. This demand deficit is compounded by major workforce distribution issues. Practice viability remains a major factor in the recruitment and retention of physiotherapists with a need for incentives to facilitate training across the full training continuum. It is unlikely that steady growth in new graduates entering the physiotherapy profession and increasing registered physiotherapists each year will be enough. A high attrition rate at five to 10 years of clinical practice contributes to critical workforce shortages. Prioritising national skills planning to address a marked gap between the early-to- mid-career physiotherapists and those ready to step into advanced scope of practice roles is key.

## Skilled stream of the Migration Program

### Simpler, more efficient and transparent

Improving the efficacy of the migration system requires a major shift towards a demand-driven system through strengthened data, a more streamlined process offering a fast track for skills most in demand, and a clearer pathway to permanent residency. A demand-driven system and improving the composition of our temporary and permanent skilled migrant intake would help attract and retain the high calibre skills. Strengthening data would also help to ensure the skilled occupation list (SOL) and priority migration skilled occupation list (PMSOL) are more reflective of critical skill need in the context of the health workforce. Flexible policies to retain international students across skills in demand are also important.

### Health workforce priorities

Skilled migration remains an important policy lever in rebuilding the health workforce, but this must be balanced by a strong policy focus on growing and retaining domestic supply. A health workforce supplementation policy should aim to address critical skill need and increase workforce supply in under-serviced locations to address unmet patient need. The lack of national health workforce planning, beyond medicine, is limiting our ability to target effective policies across priority sectors and settings to ensure workforce sustainability. This is the first key barrier to reform.

**Recommendation 1:** **Prioritise first the areas where efficiencies can be easily found by taking the complexity out of the process allowing more inputs including from the health peak bodies.**

Physiotherapists [252511, Skill Level 1] are highly-skilled clinicians and should be prioritised in reform. To address barriers for the physiotherapy workforce in the skilled stream, there is a need to streamline the process to support appropriately registered and trained physiotherapists. The current system is complex and difficult to navigate and lacks the required flexibility and agility that practice owners need. This is particularly important in directing clinicians to rural areas, where we know there is significant unmet service need, in order to address maldistribution. Most importantly, there is a need to support them once there. The focus in this context needs to be on a mix of retention strategies and education supports to encourage a permanent place in the community they have served.

**Recommendation 2:** **Maintain visa mechanisms that attract skilled migrants to regional Australia, prioritising campaigns to attract physiotherapists to rural areas.**

Regional skilled migrant physiotherapists are a key component of Australia's health workforce. The reforms underway should consider adjustments to existing visa criteria to more effectively attract skilled migrants to regional areas. A stronger regional focus nationally to align to the state and territory regional campaigns is important. This, combined, with targeted attraction and retention strategies for physiotherapy and other health disciplines, importantly without compulsion, will be required to ensure this vital workforce is supported.

**Recommendation 3:** **Direct attraction packages and retention supports for skilled migrant physiotherapists.**

**Recommendation 4:** **Provide direct incentives to rural physiotherapy practices to support practice viability and in recognition of the significant added teaching load.**

For skilled migrant physiotherapists, initially, the packages should include settlement support and incentives to offer free, fast-tracked skills assessments, free employability assessments, career advice and subsidised training. To drive longer-term retention results, broader settlement support should be considered including housing, family and regional retention support towards settlement success. Rural physiotherapy practices also require funded supports to ensure they have capacity to support skilled migrants. There is a need to formalise a structure through funding incentives to ensure there is capacity to supervise and train skilled migrant physiotherapists in their pre-registration period.

**Recommendation 5:** **Increase employer sponsored migration in skilled occupations (ANZSCO level 1) alongside strategies to expand permanent visa pathways for this cohort.**

Well-targeted immigration policy is essential to ensure a stronger focus to filling high-value gaps. There is a need to strengthen national skills data to inform planning alongside capture of important outputs from our education and training sectors. Increasing employer sponsored migration in skilled occupations (ANZSCO level 1) is important, alongside broader strategies to expanding permanent visa pathways to retain high-calibre skillsets.

**Recommendation 6:** Subsidise exam fees for skilled migrant physiotherapists.

**Recommendation 7:** Fund the APA to create accessible online courses that meet the requirements of the Australian Physiotherapy Council.

Migrant physiotherapists require support in accessing study, which is currently self-driven. The expense of the exam is also prohibitive for many. Professional support and mentorship programs for new arrivals to help orient them to the Australian health care system and more broadly Australian laws and employment protections should also be addressed.

**Recommendation 8:** Prioritise reform to the sectors with the highest skill deficits including physiotherapy in aged care, and streamline and simplify the limited registration process.

The aged care sector is reliant on skilled migrant physiotherapists. Qualified migrant physiotherapists undertake two arduous processes to gain employment in Australia – temporary skilled migration visa application process and the Limited Registration application process through the Australian Physiotherapy Council. The migration process is complicated and the paperwork difficult to understand. Currently, a migrant physiotherapist who has secured employment can migrate here but may be required to wait for their Limited Registration to be approved. While they wait for Limited Registration approval, some migrant physiotherapists work as allied health assistants in aged care, and are paid at that level, however this would not be the case in private practice. A policy priority must be place on alignment of these processes.

### Lower-skilled workers

**Recommendation 9:** Design a new pathway for the 'lower-skilled' workers to address critical shortages within the care economy.

The reforms need to consider the full spectrum of skill deficits of concern, particularly in the care economy. Valuing skills is key to the problem and the need for protections to stop exploitations. Policy solutions to offer accessible migration pathways to address specific critical skill shortages in the care economy need to be prioritised. The occupations experiencing the highest skill deficits are excluded from the mainstream program (other than employer sponsored). Reform needs to address the restrictive skilled occupation list which excludes 'lower level' occupations. Extending these lists to include aged and disability carers will be key with clear delegation frameworks and associated guidelines developed to ensure appropriate scope of practice and service delivery.

### Ethical considerations

Our reliance on migration has flow on effects to developing countries, and the reform process must consider immigration ethics to address the significant ethical issues relating to the international migration of health workers to bolster sectors. This is most relevant to recommendation 9 above and to question 5, and the need to ensure immigration ethics is prioritised as a central requirement to reform. This also is central to ensuring immigration ethics, and broader protections to stop exploitation by ensuring skilled migrants are paid appropriately. In addition, as noted in the discussion paper, there is a need to ensure reform works to strengthen relationships with our regional neighbours. A key consideration lies in offering skilled professionals 'in kind' to developing countries to train and upskill their domestic workforce.

## Conclusion

A more efficient skilled migration system is required to address critical skills gaps and for Australia to remain a top destination for skilled migrants. The right signals and settings will be key to ensuring Australia is seen as a welcoming destination. This can be achieved through reform to direct a more demand-driven system through strengthened data and more targeted skills campaigns and skills alignment. New visa offerings should include more expedited pathways for the skills most in demand, and to ensure a clear pathway to permanent residency. A focus should also be placed on the retention of international students.

## 2. APA's response to the consultation questions

### 1. What challenges and opportunities does Australia face in the coming decades?

A key challenge lies in our ability to attract high-calibre migrants with the specialised skills needed to sustain our competitiveness in a changing global marketplace. The lack of national health workforce planning, beyond medicine, is limiting our ability to target effective policies across priority sectors and settings to ensure sustainability. In future system design, there is a need to focus on both the ability to ensure adequate controls and streamlined process (internal), while also enabling more flexibility and targeted incentives to allow employers (private practices) to address labour shortages.

## 2. How can migration contribute to these challenges and opportunities?

Migration offers a solution to supplement the workforce, but should not be the only solution to addressing shortages. Policy work needs to be prioritised to address the pandemic-era border policies including streamlining processes in skill recognition, and ensuring clearer pathways to permanent residency. Maintaining visa mechanisms to attract skilled migrants to rural areas is key, as well as flexibility in the design to provide for new priority streams at the state level.

### 2.1 How do we best use the migration program to grow our economy?

Setting future growth programs through a more targeted skilled migration strategy will ensure we can attract the right mix of skilled workers to fill higher-skilled and lower-skilled occupations. National skills data analysis is required to drive gap analysis and the required skills forecasting to inform both migration and domestic workforce policies. This is important to fully understanding the labour market dynamics and trends, particularly those factors generating wage suppression and poor career pathways. Growing demand for skilled green jobs should also be considered. Flexible policies to retain international students across skills in demand is key. Most critical is the need to ensure a new pathway for the 'lower-skilled' workers to address critical shortages within the care economy. **Recommendation 9**

### 2.2 How can we design a system that supports opportunities for jobs and skills for Australians?

A key policy objective is to ensure the use of overseas workers to address temporary skills shortages, while ensuring that Australian workers get priority. This includes a greater policy emphasis on strengthened protections for skilled migrants as well as for Australian workers. Encompassing a local skill development objective or training benefit would help to develop and transfer skills to Australian workers at all levels, **but this should not come at a cost to the employer or applicant**. Strengthening data capability to identify future skills and facilitate stronger workforce planning would strengthen program aims. This would help to strengthen integrity and quality of the skilled visa programs.

### 2.3 To what extent should the availability of visas with work rights be linked to identified labour shortages?

Well-targeted immigration policy is essential to ensure a stronger focus on filling high-value gaps. There is a need to strengthen national skills data to inform planning alongside capturing important outputs from our education and training sectors. Increasing employer sponsored migration in skilled occupations (ANZSCO level 1) is important, together with broader permanent visa pathway strategies to retain high-calibre skillsets. **Recommendation 1 and 5.**

### 2.4 Should we take a different approach to identifying and counting the number of skilled migrants?

This needs to be driven by data and set to an appropriate level to address unmet skill need.

### 2.5 How can we better prevent the exploitation of migrant workers?

Extend the Assurance Protocol (employer-sponsored obligations) and monitor the currently unmonitored non-sponsored visa temporary visa categories (visitor, student, backpack, temporary activity visas), including extending support for visa holders in seeking help from the Fair Work Ombudsman.

### 2.6 How can we prevent a 'permanently temporary' cohort within the migration program?

Policy solutions to offer accessible migration pathways to address specific critical skill shortages in the care economy need to be prioritised. The occupations experiencing the highest skill deficits are excluded from the mainstream program (other than employer sponsored). Reform needs to address the restrictive skilled occupation list that excludes 'lower level' occupations. Extending these lists to include aged and disability carers will be key with clear delegation frameworks and associated guidelines developed to ensure appropriate scope of practice and service delivery.

### 2.7 How could we best use the migration program to assist Australia to build its sovereign capabilities and to address major challenges such as climate change, technological shifts and the ageing population?

Sovereign capability concerns will be better supported through the Government's planned commitment to direct a whole-of-government approach to a redesigned migration system. Years of policy inaction and dependence on outdated technologies, particularly in relation to climate change, has seen a drain of talent away from Australia. The APA acknowledges the policy shift of the current government towards stronger climate action, however, to attract talent, as well as prevent it from leaving Australia, it is clear our future focus and commitment to change must be demonstrated. This will require focus and investment in new and emerging technologies, and new pathways similar to the tech visa offered in France. In addressing other identified challenges, growing demand for skilled green jobs should be considered in the reform mix as well as a new pathway for the care economy. **Recommendation 9**

### 2.8 How can we attract and retain the best talent from around the world?

Ensure Australia is seen as a welcoming destination through reform and more targeted global skills campaigns. Strengthen data capture to ensure effort is directed to the high-calibre skillsets. Expand permanent pathways to retain high-calibre skillsets (temporary holders). Provide more flexibility for state-led global attraction schemes.

### 2.9 How do we ensure the migration program supports Australia's international interests?

Firstly, prioritise international students within the skilled migration program. Then address the question of discrimination across the full migration program. Ensure there are adequate supports for individuals, who may not meet the definition of a refugee, but who may have lived through experiences of significant political or social disorder. A further consideration is to introduce a temporary visa for vulnerable persons.

### 2.10 How do we address the specific needs of regional Australia?

Skills growth is vital to regional economies and more attention to regional-specific visas is required to support these communities attract the skills and talent they need. This includes expanding access and developing attraction packages to provide a lever for incentivising migrants to these areas. **Recommendation 2, 3 and 4**

## 3. What are the barriers in allowing migration to play these roles?

### 3.1 How can we make the system simpler and fairer for both migrants and employers?

The migration process is complicated and the paperwork difficult to understand. There is a need to simplify and streamline visa processes and paperwork for the skilled migrant workforce. Provide support with understanding and completing paperwork. **Recommendation 1**

### 3.2 How can we make the migration system more flexible and responsive to the changing needs of our economy and society?

The program needs to be flexible and responsive to specific need. The data build will be important. Consider testing limited-time pilot programs to new temporary visas in priority sectors. It is also important to build a more robust picture of the positive economic impacts of migration.

### 3.3 How can we make the migration system more accessible to small employers and start-ups?

New pathways for entrepreneurs. Replicate the fast-tracked French Tech Visa.

### 3.4 How could longer-term planning support investment in the necessary infrastructure and services?

Affordability aspects need to be factored into infrastructure and services planning as increasing intake without improving services will only increase existing pressures on housing, the health system and hospitals.

### 3.5 What are the barriers to the participation of migrants in the labour market, including those entering through the family and humanitarian streams and secondary migrants?

It is challenging to migrate and find affordable housing. There is a need to coordinate migration and cross-department support programs and introduce a subsidised short-term accommodation scheme across priority streams.

## 4. What reforms are needed to ensure the migration system can meet the challenges and opportunities that lie ahead?

### 4.1 How can we better identify and respond to future labour market needs?

Improving the efficacy of the migration system requires a major shift towards a demand-driven system through encompassing strengthened data, more streamlined process offering a fast-track for skills most in demand, and by ensuring a clearer pathway to permanent residency. A demand-driven system and improving the composition of our temporary and permanent skilled migrant intake would help attract and retain the high calibre skills we require.

### 4.2 How do we best structure pathways to permanent residence and citizenship to meet the nation's needs?

Lengthy, arduous processes to secure permanent visa/residency result in loss of experienced and skilled physiotherapists from the country. More effort to streamline permanent application process for skilled migrants who have been employed and met the conditions of their visas for a mandated period of time are required. **Recommendation 5**

## 5. How do we further strengthen and maintain Australians' public confidence in the migration program?

### 5.1 What principles should underpin our future migration system, including to address migrant worker exploitation?

The redesign should encompass a more portable (temporary) visa so that skilled migrants have the option to switch sponsoring employers and/or escape exploitation. **Refer also to discussion on ethical considerations on page 5.**

### 5.2 Are there other ways our migration system can support Australia's future prosperity and well-being?

Discussed throughout. The priority must be placed on prioritising high-calibre skillsets. **Recommendation 1 to 9**