



23 October 2023

Director, Quality Assurance
Department of Employment and Workplace Relations
Canberra ACT 2600

Via email: AAPA@dewr.gov.au

Dear Director

The Australian Hotels Association (AHA) and Accommodation Australia (AA) appreciate the opportunity to comment on the Draft Best practice Principles and Standards for Skilled Migration Assessing Authorities.

AA, the nation's only peak body representing the accommodation sector, was formed on 1 July 2023 after the merger of Tourism Accommodation Australia and the Accommodation Association of Australia. AA represents more than 1400 properties ranging from independent regional motels and caravan parks to the largest local and international hotels and resort groups, including Best Western, Choice, Golden Chain, Lancemore, Ovolo, Crystalbrook, Accor, Hyatt, IHG, Marriott, Crown, Pan Pacific, TFE, Minor, Ascott & Quest Apartments, EVT Group, Star, Hilton and Wyndham Destinations. AA is the accommodation division of the peak hospitality body – the Australian Hotels Association. The Australian Hotels Association (AHA) represents more than 5,000 members, including hotels, pubs, and taverns, across Australia serviced by a network of branches based in every state and territory.

The migration program is critically important to the accommodation sector, and the hotels industry more broadly. Skills assessment is a compulsory requirement for employers in sponsoring many of the occupations important to our industry. Over the years, members have reported their frustration with the lengthy delays in finalising assessments, particularly those arranged overseas, as well as the cost. Over the last few months the AHA has arranged meetings with DEWR and TRA to provide specific examples of problems being experienced in this area.

The implementation of best practice principles and standards for skills assessing authorities provides an opportunity to address these issues by imposing on the assessing authorities a greater accountability and a stronger framework for their activity. The proposed seven principles and standards are sensible and broadly supported.

In particular, we are drawn to the following principles and standards: timely and efficient, integrity and transparency and value for money. We support comments made by ACCI, of which we are a member, that navigating the assessment process can be very challenging, and requires more attention on the part of assessing authorities as well as Home Affairs to make the process clearer and easier to navigate. Also, ACCI's comments concerning the costs associated with assessments are also supported. If early indications of the imminent migration reforms are implemented, and the sponsored migrant is able to leave their sponsoring employer more readily, these costs will become particularly challenging as the cost burden of the initial skills assessment will not be shared with future employers.



In relation to transparency, there needs to be a significant improvement in management of performance data of the assessing authorities including their reporting of the time it is taking for assessments (both here and abroad) and the cost, linked to the occupation being assessed. This data should then be available to users, both employers and independent skilled migrants, so that they can make an informed choice when there are options for assessment, and also so that they are better aware of what the time and cost will be. This transparency and availability of performance data should improve the accountability of the assessing authorities, even in those occupations where an authority may be the sole assessor option.

By way of example, it is understood from the data presented at the recent Migration Institute of Australia conference that chefs have the highest number of applications for assessment received but a much lower number of successful assessments. It is important that this data be more readily available and the reasons for these outcomes better understood.

In relation to proposed principle 6, DEWR should initiate a survey of sponsoring employers every 1-3 years to better understand the level of satisfaction of the assessment and the employment outcomes of the migrant more broadly. With regard to proposed 6.1 (after care), the implementation of this may need to be case by case, and also be cognisant of the cost. Post-assessment monitoring would be costly, and if this is passed onto to the migrant or employer, this would be a concern. Also, some assessing authorities would be better equipped than others in providing this service. We do not see a role at all for 6.2 (educating employers and promoting migrants), at least not in the bodies' role as assessing authorities. Some of the authorities are also industry bodies, and in that capacity this broader role may be relevant.

Overall, any action taken by DEWR in its quality oversight of assessing authorities that improves the timeliness and cost of assessment is supported. Greater accountability for performance by assessing authorities, which appears to underpin the implementation of new best practice principles and standards would be a very positive outcome.

Regards

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