Australian University and Research Institute Stakeholder Submission to Jobs and Skills Australia on the Draft Core Skills Occupations List (CSOL) For Consultation.

31 May 2024

Dear Colleagues,

We value the opportunity to provide this submission and participate in the invited consultation by Jobs and Skills Australia to comment on the Draft Core Skills Occupations List (CSOL).

We make this submission in our capacity as immigration lawyers, with a focus on the interests and business needs of Australian university and medical research institutes[1] – many of which are long-term clients. These include more than 30 Australian universities, as well as some of Australia's oldest and most prestigious medical research institutes. Operating and competing in an international context, these higher education and research institutions make critical economic, educational, social, health and strategic sovereign capability contributions to Australia. For brevity, we refer to universities and research institutes collectively as 'the Sector' in the below.

While the majority of roles at Australian universities and medical research institutes are filled by Australian citizens or permanent residents, a small number (less than 5%)[2] are filled by foreign nationals with specific skill sets and experience obtained internationally, and which cannot be recruited locally. These professionals typically bring global expertise in running large-scale operations or cutting-edge research techniques and processes that may not yet be available, or well developed in Australia. Hence, they assist to replicate and implement internationally successful, established, world-leading processes, programs, technology and/or strategies at Australian universities and research institutes. These highly sought after appointees, in turn, assist in attracting to Australian universities and research institutes competitive research grants and funding; both local and international students; as well as local and international collaborators. Ultimately, this enables these Australian institutions to offer world-leading teaching programs and to compete internationally in a myriad of research fields, such that our Australian institutions rank among the best in the world, with respect to their international ranking.

To facilitate visa processes for these employees, the Sector relies predominantly on employer-sponsored nomination via the Temporary Skills Shortage (subclass 482) visa pathway (temporary visas) and the Employer Nomination Scheme (subclass 186) visa program (permanent visas) to secure work visas for their employees. To nominate employees for these visas, currently the nominated occupation must appear on the Australian and New Zealand Standard Classification of Occupations (ANZSCO) as well as on either the Medium and Long-term Strategic Skills List (MLTSSL) or the Short-term Skilled Occupation List (STSOL) for subclass 482 sponsorship, or on the MLTSSL for subclass 186 sponsorship.

As part of the Government's Migration Strategy,[3] Jobs and Skills Australia has been charged with developing a single consolidated list – the Draft Core Skills Occupations List (CSOL), for presentation to the Minister for Immigration, Citizenship and Multicultural Affairs, who will decide on the final CSOL. The CSOL will operate in a similar manner to the Skilled Migration Occupation Lists for nomination for a temporary work visa. The new Skills in Demand Core Skills Stream temporary visa pathway will rely on the CSOL. This pathway is for applicants nominated by employers, where the base annual salary offered exceeds the Temporary Skilled Migration Income Threshold (TSMIT), currently set at $70,000 but is below $135,000. For salaries of $135,000 and above, workers will be eligible to

[1] In this submission, medical research institute is defined as a National Health and Medical Research Council (M=NHMRC) approved administering institution – for list of NHMRC administering institutions available here: https://www.nhmrc.gov.au/funding/manage-your-funding/nhmrcs-administering-institutions

[2] *A 2019 survey of nomination application data provided to the Department of Home Affairs by 23 Australian universities, showed that, on average, these universities listed 3% of their employees as foreign nationals holding a Temporary Skill Shortage (subclass 482) visa – amongst these universities, the lowest in the range was 1% and the highest was 7%.*

[3] https://immi.homeaffairs.gov.au/programs-subsite/migration-strategy/Documents/migration-strategy.pdf

apply in any occupation (except trades workers, machinery operators and drivers, and labourers), for a Specialist Skills Stream visa, within the Skills in Demand visa program. Though it is noted that highly skilled workers, who are offered a salary of $135,000 or above, will not be required to be nominated for an occupation on an occupation list, this is not yet legislated, and for the purpose of our submission, we address all occupations critical to the Sector, and have not eliminated those which may ultimately be eligible via the new Specialist Skills Stream visa pathway. We also understand that it is not Jobs and Skills Australia's brief to eliminate these occupations from the CSOL.

Further, with respect to permanent visas, other than the proposed National Innovation Visa (NIV) which will replace the Global Talent Independent (subclass 858) visa, it is unclear how the employer sponsored (subclass 186) visa pathway will operate. Specifically, it is unclear whether the MLTSSL will remain, or whether CSOL will replace the MLTSSL for nomination via the subclass 186 pathway. Working on the assumption that the Government will rely on one consolidated list – CSOL – for both temporary and permanent employer-sponsored visas, we provide the below submission on occupations that are business-critical to both Australian universities and research institutes.

1. Overview – Skilled Occupations Sought by Universities and Research Institutes

We welcome the inclusion of the occupation of University Lecturer (ANZSCO 242111) on the 'confident on' list of CSOL occupations. Year on year, within the Employer Sponsored (permanent resident; subclass 186) Visa Program, the occupation of University Lecturer appears within the top 10 nominated occupations[4] and within the top 15 nominated occupations within the Temporary Resident (skilled) visa program (subclass 482).[5] The vast majority (91%) of positions nominated for employer sponsored visas by universities are for the ANZSCO occupation University Lecturer. This occupation covers all academic positions (Levels A to E). The ability to utilise the migration program to hire University Lecturers ensures that Australia's universities can continue to compete globally with others, to hire international candidates whose research and teaching expertise is at the top of their field internationally and not available in Australia. In these contexts, commonly after months of extensive searches, presentations, interviews and visits for top candidates, the most suitable applicant for the role, is an international candidate, with skills and expertise that are not locally available. These highly skilled candidates add immeasurably to our national innovation and competitiveness, and facilitates skills transfer to Australians.

Australia is home to 42 universities.[6] Behind the coal, iron ore, and natural gas industries, the higher education sector makes leading contributions to Australia's economy. Indeed, in the 2022-23 financial year, international education was the fourth largest Australian export worth $36.4 billion. It is therefore vital that Australian universities are able to nominate workers in appropriate occupations for the positions they need filled in order for Australian universities to continue to make such crucial contributions to the Australian economy.

On average, Australian universities employ around 2,000 full-time employees each, with the Group of Eight Universities employing an average of around 4,500 full-time employees each.[7] While most academic positions at Australian universities are advertised internationally, Australians are overwhelmingly the majority of successful candidates. On average, across Australian universities, less than 5% of employees[8] hold temporary work visas. Nonetheless, in certain critical areas there are

[4] https://data.gov.au/data/dataset/australian-migration-statistics
[5] https://www.homeaffairs.gov.au/research-and-statistics/statistics/visa-statistics/work
[6] https://www.studyaustralia.gov.au/en/plan-your-studies/list-of-australian-universities#:~:text=Australia%20is%20home%20to%2042,across%20all%20states%20and%20territories.
[7] https://www.education.gov.au/higher-education-statistics/resources/2021-staff-fulltime-equivalence
[8] A 2019 survey of nomination application data provided to the Department of Home Affairs by 23 Australian universities, when nominating a foreign national for a Temporary Skill Shortage (subclass 482) visa showed this

international candidates whose research and teaching expertise is either vastly superior to the pool of Australian applicants or is not available in Australia. In these contexts, commonly after months of extensive searching, presentations, interviews and visits for top candidates, the most suitable applicant for the role is an international candidate, with skills and expertise that are not locally available. These highly skilled candidates add immeasurably to our national innovation and competitiveness.

All academic staff within the higher education sector are employed in accordance with the Academic scale of their relevant Enterprise Agreement (classified as Academic Level A to E). All levels on this scale are captured within ANZSCO occupation 242111 – University Lecturer, apart from Deans of Faculties, which come within ANZSCO occupation 134411 – Faculty Head. Professional staff are predominantly sourced from the local labour pool; however, a very small percentage are sourced internationally, due to the critical skills they contribute to the Sector. Apart from Faculty Head on the academic scale, this submission is primarily focused with the professional roles recruited internationally and nominated by Australia's universities and research institutes.

All Australian universities are in the business of skilling Australians as well as in leading Australia's research and development priorities including health, renewable energy, cybersecurity, food, soil and water, advanced manufacturing, resources, and environmental change. Australia's universities are pivotal in producing highly-skilled graduates for our changing workforce; conducting vital research that leads to innovation; contributing directly to the economy; and participating in public debate.[9]

Similarly, Australia's research institutes make leading contributions to cutting-edge internationally recognised and leading research within the domains of: health with key focuses on medical technology, immunology, cancer research and vaccine development; artificial intelligence and computer vision; and quantum computing.

This submission is informed by a survey conducted of our university and research institute clients, where we asked these organisations to list ANZSCO occupations on the 'For Consultation' and 'Confident Off' lists that are critical to their business needs, and where the loss of the ability to nominate these occupations to secure visas for foreign hires would significantly impact their operation. We received responses from ten Australian universities and two Australian medical research institutes. We confirm that the views expressed in this submission are informed by the views of our clients shared in this survey.

To determine the ANZSCO occupations nominated by universities and research institutes, we reviewed a sample of 2,406 employer-sponsored visa matters nominated between 2017 – 2024.[10] The nominated occupations are classified according to the 'Confident On', 'Targeted for Consultation', and 'Confident Off' lists developed by Jobs and Skills Australia. From the sample reviewed, 91% of these nominations were for the occupation University Lecturer and the remaining 9%, though small in proportion, represent a critical set of occupations for the Sector, have not been able to fill from the local labour market. Instead, that universities and research institutes have recruited these candidates internationally. Though low in number, many are strategic and/or business critical roles, which would impact operations, if the ability to fill positions with these international candidates was not available. A list of occupations key to Australian universities and medical research institutes is provided in Table 1.

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figure was 3% on average – the lowest in the range was 1% and the highest was 7%. Six of the universities surveyed were Go8 universities and their average was 4.3%. Survey conducted by Visa Lawyers Australia.

[9] https://www.universitiesaustralia.edu.au/wp-content/uploads/2021/09/Universities-Australia-Strategic-Plan-2017-2021.pdf

[10] A seven year period was examined rather than 5-year period, due to very low numbers which were not representative during the COVID-19 border closure period.

In developing a weighting of the importance of these occupations to the Sector, we examined and rated 'demand'[11] for the occupation in the Sector, as well as 'critical need'[12] or put another way, the impact to the business of not being able to recruit for a role.

As indicated in Table 1., the median salary for the vast majority of those nominated in the ANZSCO occupations listed are within the range that will require nomination via the proposed Core Skills Stream visa (between $70,000 and $135,000), rather than the proposed Specialist Skills Stream visa (above $135,000).

[11] Demand was defined as the number nominated relative to other occupations, rated as low. Medium, high, or very high.

[12] Critical Need was assessed on the basis of qualitative evaluations examining the importance to the businesses of filling the role to progress work/projects and also considered the level of disruption or consequences of the inability to complete funded research by not being able to fill the role.

Table 1. Draft CSOL Occupations frequently nominated by universities and medical research institutes

ANZSCO Code	JSA List	Demand	Critical Need	Median Salary
131112 - Sales and Marketing Manager	Confident On	Low	Low	$ 144,048
132511 - Research and Development Manager	Confident On	High	High	$ 101,180
224999 - Information and Organisation Professionals nec	Confident On	Low	High	$ 114,139
234412 - Geophysicist	Confident On	Low	Medium	$ 91,472
234513 - Biochemist	Confident On	Medium	Medium	$ 95,763
234711 - Veterinarian	Confident On	High	High	$ 115,144
234914 - Physicist	Confident On	Low	Medium	$ 100,418
242111 - University Lecturer	Confident On	Very High	Very High	$ 106,337
261312 - Developer Programmer	Confident On	Very High	Medium	$ 94,608
111211 - Corporate General Manager	For Consultation	Very High	Very High[(1),(4)]	$ 251,689
132111 - Corporate Services Manager	For Consultation	Low	Low	$ 108,787
132211 - Finance Manager	For Consultation	Low	Low	$ 95,629
132411 - Policy and Planning Manager	For Consultation	Low	Low	$ 136,821
133612 - Procurement Manager	For Consultation	Low	Low	$ 137,832
134411 - Faculty Head	For Consultation	High	Very High[(1),(2)]	$ 346,297
139911 - Arts Administrator or Manager	For Consultation	Low	Low	$ 84,970
139913 - Laboratory Manager	For Consultation	Low	Low[(2)]	$ 91,967
221111 - Accountant (General)	For Consultation	Low	Low	$ 83,309
221112 - Management Accountant	For Consultation	Low	Low	$ 118,509
224116 - Statistician (previously 224113)	For Consultation	High	High[(2)]	$ 96,661
224711 - Management Consultant	For Consultation	High	Low	$ 115,006
225113 - Marketing Specialist	For Consultation	Medium	Low[(4)]	$ 96,048
225311 - Public Relations Professional	For Consultation	High	Medium	$ 104,381
233111 - Chemical Engineer	For Consultation	Low	Low	
233112 - Materials Engineer	For Consultation	Low	Low	$ 92,457
233411 - Electronics Engineer	For Consultation	Low	Low	$ 82,399
233512 - Mechanical Engineer	For Consultation	High	High	$ 128,000
233913 - Biomedical Engineer	For Consultation	High	High[(2)]	$ 96,661
234114 - Agricultural Research Scientist (previously 234112)	For Consultation	Low	Medium	$ 54,725
234116 - Aquaculture or Fisheries Scientist	For Consultation	Low	Medium	
234211 - Chemist	For Consultation	Low	Medium	
234511 - Life Scientist (General)	For Consultation	High	High[(2)]	$ 102,380
234514 - Biotechnologist	For Consultation	Very High	High[(2)]	$ 93,080
234516 - Marine Biologist	For Consultation	Low	Medium	$ 79,961
234599 - Life Scientists nec	For Consultation	Very High	Very High[(2)]	$ 93,749
234911 - Objects Conservator	For Consultation	Low	Medium[(5)]	$ 76,870
234999 - Natural and Physical Science Professionals nec	For Consultation	Medium	Medium	$ 100,264
261111 - ICT Business Analyst	For Consultation	Low	Medium	$ 120,581
261112 - Systems Analyst	For Consultation	Low	Low	$ 105,474
261211 - Multimedia Specialist	For Consultation	High	High	$ 101,531
261311 - Analyst Programmer	For Consultation	Medium	Low	$ 74,952
261313 - Software Engineer	For Consultation	High	High	$ 93,254
261315 - Cyber Security Engineer	For Consultation	Future	Medium[(2)]	
262114 - Cyber Governance Risk and Compliance Specialist	For Consultation	Future	Medium	
262115 - Cyber Security Advice and Assessment Specialist	For Consultation	Future	Medium	
262116 - Cyber Security Analyst	For Consultation	Future	Medium[(2)]	
262117 - Cyber Security Architect	For Consultation	Future	Medium	
262118 - Cyber Security Operations Coordinator	For Consultation	Future	Medium	
361311 - Veterinary Nurse	For Consultation	High	Very High	$ 70,000
511112 - Program or Project Administrator	For Consultation	High	High[(3)]	$ 105,413
131114 - Public Relations Manager	Removed	Low	Medium[(1),(4)]	
139999 - Specialist Managers nec	Removed	Low	Medium[(4)]	$ 205,000
149311 - Conference and Event Organiser	Removed	Low	Low	$ 98,724
224213 - Health Information Manager	Removed	Low	Low	$ 76,779
224611 - Librarian	Removed	Low	High[(1),(5)]	$ 89,845
234517 - Microbiologist	Removed	Low	Medium	$ 97,152
234611 - Medical Laboratory Scientist	Removed	Low	Medium[(2),(5)]	$ 105,569
249111 - Education Adviser	Removed	Low	Low	$ 99,495
272199 - Counsellors nec	Removed	Low	Low	$ 104,800
311413 - Life Science Technician	Removed	Low	Low	$ 87,587

Notes: *(1) Strategically important appointments nominated under this ANZSCO Occupation, eg executive roles, Deputy Vice-Chancellors etc*
(2) Important to research institutes but also nominated by universities
(3) Includes those nominated as clinical trials co-ordinators or managers
(4) Occupations which have been nominated for Advancement Professionals
(5) Low numbers but may have critical/stategic specialist skills not locally available in Australia

Source data: *2,406 nominations of ANSZCO Occupations by universities and research institutes (2017-2024); where 'Demand' indicates volume nominated relative to other occupations nominated; and 'Critical Need' is a qualitative assessment of need, based on assessment of project / business function disruption if role not filled. Median Salary provided where available*

2. Key Strategic Occupations to Universities and Research Institutes

Corporate General Manager (ANZSCO 111211) and Faculty Head (ANZSCO 134411) are very high demand and high demand occupations, respectively, to both universities and research institutes. Both are rated by these employers as very high with respect to their critical nature in contributing to the strategy and operations of their employing organisations within the Sector, contributing to their national and international standing and competitiveness. Thus, they have significant impacts on the institutions that the lead and manage, and thus the ability of these institutions to attract students and/or funding, thereby impacting the role of universities and research institutes in the Australian economy. We recommend that these two occupations are not removed from the CSOL given the strategic role they play for the Sector. In the alternative, we recommend that these occupations are made available for use by the Sector by way of caveat, to allow the Sector to nominate in these occupations as necessary.

2.1 Corporate General Manager (ANZSCO 111211)

Central to the structure of universities are roles such as Pro-Vice-Chancellor, Deputy Vice Chancellor, Provost, etc. Since 2017, our four largest university clients have nominated 11 overseas workers using the occupation of Corporate General Manager. Positions such as these are the highest ranking at universities and research institutes, contributing an integral role to their leadership and governance. While Australian universities and research institutes are often able to fill such positions locally, it is occasionally necessary for them to hire an international applicant. A leading Australian university, responding to our survey, described these roles as critical to providing *'leadership, direction and management to ensure the financial viability and reputation of the University'*. Positions, commonly aligned with and nominated as Corporate General Manager at universities include Deputy Vice-Chancellor, Pro Vice-Chancellor, and Provost. At research institutes, they include Research Director and Division Head etc.

The ANZSCO definition of Corporate General Manager is someone who 'plans, organises, directs, controls and reviews the day-to-day operations and major functions of a commercial, industrial, governmental or other organisation through departmental manager and subordinate executives.'[13] This definition aligns closely with the description provided by our university clients, as quoted above. The needs of universities are different to those of other Australian companies that may hire people in the occupation of Corporate General Manager. Universities may attach special conditions to these kinds of roles. One university notes that the roles that would be nominated in the occupation of Corporate General Manager in universities can be specialised and niche, making them difficult to fill in the Australian market. A Group of Eight[14] university notes that not being able to nominate foreign nationals in this position will have, '*a profound impact on academic institutions, students and the broader community…erode institutional knowledge and disrupt ongoing research projects, which may potentially stall advancements in various fields*.'

The occupation of Corporate General Manager has also been used to fill advancement positions at high levels. A common example where we have assisted includes nominating the occupation of Corporate General Manager to fill the position of 'Director, Development', which is responsible for developing and implementing philanthropic revenue and leading a team of fundraising and development professionals to grow the university's philanthropic funds. Advancement teams are central to the work that universities do outside of research and teaching, and it is necessary that occupations remain available for universities to utilise to fill roles in these teams.

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[13] https://www.abs.gov.au/statistics/classifications/anzsco-australian-and-new-zealand-standard-classification-occupations/2022/browse-classification/1/11/111/1112

[14] The Group of Eight (Go8) comprises Australia's leading research-intensive universities – see: https://go8.edu.au/about/the-go8#:~:text=The%20Group%20of%20Eight%20(Go8,Monash%20University%20and%20UNSW%20Sydney.

The occupation of Corporate General Manager is the most suitable occupation for hiring these senior leadership roles, as it is an occupation that requires a person who is capable of managing and directing a large organisation. Universities require that individuals hired for such roles have specific skills and experience, which may not be available locally. In order to ensure that Australian universities can deliver the best possible teaching and world leading research, it is necessary that they hire the best suited people for these high-level leadership roles. It would therefore be detrimental to Australian universities if they were no longer able to nominate under this occupation.

2.2 Faculty Head (ANZSCO 134411)

Similarly, the occupation of Faculty Head is business critical to universities and is nominated for roles key to the structure and functioning of the universities, that of Dean or Executive Dean. Universities are divided into business units titled faculties, schools, or colleges, and the Dean (Faculty Head) serves as head of a specific business unit. According to the ANZSCO definition, the Faculty Head plans, organises, directs, controls, and coordinates the educational and administrative aspects of a department, faculty or school within a university or other tertiary education institution.

Indeed, this occupation is specifically tailored for the Sector and continues to have relevance. As one of our university clients raised in the survey, roles such as Head of School and Faculty Dean are leadership roles, and are distinct from the occupation of University Lecturer. However, such a role could not be filled by a Corporate General Manager because, as per the ANZSCO definition, knowledge of the educational aspects of a faculty or school are central to the role and differentiate it from other senior leadership roles. In addition, the Deans are separate to other senior executives such as the Deputy Vice-Chancellors, Pro Vice-Chancellors, Provosts, and other senior leadership roles within universities, where their duties and position within the organisation structure are better aligned with Corporate General Manager. Hence, there are no other suitable ANZSCO occupations that capture the duties and responsibilities specific to the head of a university's business unit (i.e., faculty, school, or college).

A leading Australian university notes that the foreign nationals recruited into Faculty Head roles *'have internationally leading and global experience that brings strategic benefit to the role, which positions the University competitively internationally, and brings strategic benefit to the University that is not available locally.*' This reflects the benefit of being able to nominate foreign nationals under this occupation brings to the Sector and Australia more broadly.

Further, with respect to research institutes, Faculty Head is an occupation that has also been utilised by these institutes to nominate foreign nationals to take up Head of Research Division roles. For these organisations, this occupation needs to be retained to ensure that research institutes have the ability to recruit internationally recognised leaders to head their research divisions that have the requisite, relevant research knowledge and experience, and are able to utilise this specialist knowledge and experience to secure grant funding for their employing institute, as well as to mentor the next generation of scientists in Australia.

Both Corporate General Manager and Faculty Head are significant to the continued thriving of universities, research institutes and Australia's higher education Sector more broadly. It is vital that universities are able to continue to access these occupations so that they are able to nominate suitably skilled staff where expertise can only be found internationally.

3. Other Occupations Critical to Universities and Medical Research Institutes

3.1 Life Scientist (General) (ANZSCO 234511) and Life Scientist nec (ANZSCO 234599)

The occupation of Life Scientist (General) is of significant importance to Australia's leading research endeavours in medicine and science. In particular, it is one of the most commonly nominated occupations by medical research institutes. As these institutes are not tertiary education institutions, they are not able to nominate the occupation of University Lecturer to fill their research positions. A prominent medical research institute describes the occupation of Life Scientist (General) as one of '*our core business positions*,' and notes that this is its most sponsored occupation in the last five years. Medical research institutes must often hire workers with niche, specialist skills to conduct high-level targeted research in areas including cancer, immunology, cardiovascular research, endocrine research, and aging. These employees help Australian research institutes to push the boundaries in medical science. They are often trained on specialist techniques developed in leading laboratories around the world and thus have highly technical skills that are often not available among local workers, meaning that these institutes must nominate foreign nationals to fill these positions. Removing Life Scientist, both General and 'not elsewhere classified' (nec) from the list would have a detrimental impact on the ability of Australia's medical research institutions to hire people with the niche knowledge and experience needed to conduct cutting-edge research, making significant contributions to growing Australia's research community and Australia's standing internationally. In addition, they are engaged in skills transfer, thus training and upskilling our local researchers and students in the field. Finally, it should be noted that whilst Life Scientist (General) and (nec) are largely occupations nominated by research institutes, they are also important to and nominated by universities where research projects funded by the Australian Government rely on specialist technicians and researchers that are engaged to progress work on these projects, rather than as an academic (where they would instead be nominated as University Lecturer).

3.2 Biotechnologist (ANZSCO 234514)

Similarly to Life Scientist, Australia's medical and science research institutes also make consistent use of Biotechnologist to bring in suitably skilled workers in the Government's priority sector of Health Industries. Again, this occupation is of particular use for research institutes who are not able to utilise University Lecturer to nominate researchers in key areas such as immunology and cancer research, among others. These individuals bring in specific knowledge and research experience that is extremely beneficial to the work of research institutes, and also to universities when employed in professional rather than academic roles. Our firm has assisted with 9 applications for biotechnologists in the last five years.

Case Study 1:

In late 2023, a medical research institute nominated an applicant under the occupation of Biotechnologist. This applicant was hired at Research Support Employee level 6, step 5, at a salary of $96,311 per annum on a two-year contract. This applicant was brought in to work on a short-term global health research project requiring knowledge and experience in researching tuberculosis. Prior to coming to work at the Australian research institute, this applicant had worked internationally as a senior investigator, specialising tuberculosis biology. The applicant had postdoctoral research experience in biology, including in tuberculosis, and held an Honours degree in applied biotechnology and a PhD in molecular and cell biology and biochemistry. Included in their training was an award by the UK's Royal Society to undertake a training grant visit to the prestigious and internationally recognised Francis Crick Institute in London. This reflects the world-class calibre of this researcher. It is noted, that included in the Australian research institute's submissions to the Department of Home Affairs was an expression of the genuine need for this applicant to fill the position, where it was stated that there were no other suitable Australian citizens or permanent residents with the requisite skills and experience to take up the position.

Case Study 2:

The occupation of Biotechnologist is in high demand at universities, as biotechnology projects, including those focused on synthetic biology, require skills and expertise that are in low supply in Australia. Synthetic biology is a nascent industry in Australia, but the Federal Government has named Biotechnology, which includes synthetic biology, as a Critical Technology of National Interest[15]. At Australia's biofoundries, such as those funded by the Australian Government through the National Collaborative Research Infrastructure Strategy,[16] a specific subset of biotechnologist with microbial synthetic biology skills (combination of microbiology, molecular biology, genetic engineering, fermentation, bioinformatics skills) are required to staff these world class facilities. These facilities work with clients from industry, start-ups, academia, and government, and compete internationally to achieve new cutting-edge developments in this field. One such synthetic biology service facility located at an Australian university has noted that their staff need to have experience with multiple microbial systems with highly specialised equipment and the ability to work across multiple projects in parallel whilst delivering high quality results to clients on tight timelines. Local undergraduates do not have the training and experience required to work at this level. This facility's recruitment shows that there is a limited pool of appropriately skilled people in Australia and recruitment from overseas is necessary to find candidates with the right skill set. Recruiting staff from outside Australia brings skills in synthetic biology and biotechnology into the country and enables upskilling of the Australian workforce, so Australians can develop the necessary breadth and depth of experience to take on these roles in the future. Without the ability to recruit internationally this facility notes that it would be unable to deliver high-quality, world-class synthetic biology and biotechnology services for its clients and stakeholders, or to accelerate the development of the Australian synthetic biology industry as it has been tasked by the Australian Government. The facility notes that Australian undergraduates are not trained with the requisite skills and don't have the depth and breadth of experience required to work independently to innovate and instead are only able to fill technical support roles. Instead, this facility seeks to recruit postgraduates with specialised experience, often from postdoctoral work internationally, and of the four technical leaders that it currently employs, only one is an Australian with PhD qualifications, while the remaining three are foreign nationals with PhD qualifications.

3.3 Program or Project Administrator (ANZSCO 511112)

While a very broad occupation, utilised by many industries, universities and research institutes alike have made use of the occupation of Program or Project Administrator in order to hire talented and specially trained clinical trial managers. As there is no specific ANZSCO occupation available for clinical trial managers, this occupation has proven to be the most closely aligned and useful for nominating applicants to take up these highly skilled medical research roles in Australia.

Management of clinical trials, particularly large-scale clinical trials, requires a high level of knowledge and a depth of experience that can be difficult to source in Australia, particularly as globally, most large-scale clinical trials are carried out in the United States, Asia and Europe.[17] In order to ensure the best outcomes for Australian clinical trials and to continue to build this branch of medical and pharmaceutical research in Australia, thereby attracting biotechnology and pharma companies to Australia, it is vital that universities and research institutes are able to hire people with the specialist skills and experience required.

[15] https://www.industry.gov.au/publications/list-critical-technologies-national-interest/biotechnologies
[16] https://www.education.gov.au/ncris
[17] https://www.who.int/observatories/global-observatory-on-health-research-and-development/monitoring/number-of-clinical-trials-by-year-country-who-region-and-income-group

Case Study 3:

In February 2023, an Australian university nominated a Senior Clinical Trial Coordinator under the occupation of Program or Project Administrator to oversee a range of clinical trials and feasibility studies investigating the safety, efficacy, and feasibility for vivax malaria in vulnerable countries. The foreign national nominated for the position had over seven years of experience working in clinical trials at the time of nomination, including four malaria treatment clinical trials. Such depth of knowledge and experience of clinical trials in this area could not be found locally. The nominated base annual salary for this role was $102,636.

3.4 Statistician (ANZSCO 224116)

The occupation of Statistician is in high demand in the higher education and research sector. Statistician is used by universities to fill data-based research positions where it may not be appropriate to use other occupations such as University Lecturer or Life Scientist to fill the roll. This occupation has been used to nominate foreign nationals into roles such as data scientist, senior research analyst, and in bioinformaticians roles. These positions often require a high-level of skill and niche knowledge about particular areas of science or research and can therefore be difficult to fill locally. The research conducted by bioinformaticians is significant to both universities and medical research institutes. Bioinformatics is an emerging, multidisciplinary field involving the use of the latest computer science technologies to extract, analyse and interpret biological data. The skills of a bioinformatician are important in analysing and making meaningful interpretations of the ever-increasing volume of biological data generated by sophisticated genomic and other MedTech techniques. In particular, the COVID-19 pandemic has highlighted the importance of analysing and interpreting data to understand the function, cause and spread of diseases.

A notable example of where such a role has been critical is the University of New South Wales Microbiome Research Centre. In 2018, this Centre received a $4 million grant announced by the Prime Minister to establish a globally competitive research team, which would rely heavily on its bioinformatics team. This team has hired international talent, where local skills were not available, to the team to ensure that there is suitably skilled talent to undertake cutting-edge research with the high-level of experience and knowledge required to be able to make significant contributions to the research and allow the Microbiome Research Centre to continue to make leading contributions both nationally and internationally.

The Sector may face substantial negative impact, and difficulties in performing high-level multivariable analysis or in analysing and interpreting ever more common big datasets in medical science research, if Australian universities and research institutes are no longer able to recruit foreign talent into statistician roles. Thus, we recommend that the ANZSCO occupation Statistician not be removed from the CSOL list.

3.5 Summary – Other Critical Occupations

The above-listed occupations bring specialist skills to Australia. In their response to our survey, a medical research institute reflected on the importance of those nominated by their organisation under these occupations to Australia, stating: *'They have often trained and worked in the best laboratories in the world with unique technologies not available in Australia'.* The same institute also noted that the impact of removing these occupations would be detrimental to the wider medical research sector's ability to perform internationally leading research with '*catastrophic'* outcomes for the sector, and for patients. Further, it is noted that these specialist skills often cannot be found amongst a graduate cohort. They require significant postgraduate study and post-qualification experience, and exposure to a range of unique and specialised technologies and methodologies often only developed and available in one or two laboratories globally, and not currently accessible in Australia. It is

necessary that these skills are brought to Australia via these foreign national workers so that they can then be shared with our science and research workforce, including our graduates.

While requiring highly skilled individuals for these positions, salaries for Life Scientist, Biotechnologist, Program or Project Administrator and Statistician roles are generally under $135,000. For example, Life Scientist nec and Biotechnologist roles tend to offer a salary in the range $85,638 - $104,281. Program or Project Administrator roles can fall between $115,467 to $145,428, meaning that they are often below $135,000. It is therefore crucial that these occupations are included in the CSOL, to ensure that research institutes can continue to bring appropriately skilled workers to Australia to contribute to cutting edge research that is benefitting Australia. Not only do people nominated by research institutes into these occupations provide important knowledge and experience to Australian research, but they also grow the skills of the Australian workforce by facilitating skills exchange.

4. Other Strategically Important Occupations to Universities and Research Institutes

4.1 Mechanical Engineer (ANZSCO 233512)

The occupation of Mechanical Engineer is in high demand amongst universities in Australia, as particular engineering projects require skills that are difficult to find locally.

For example, a leading research-intensive university has noted that it has utilised the occupation Mechanical Engineer to nominate senior engineers for railway technology projects. These senior engineers are responsible for designing, developing, testing, managing, planning, and supporting large research and consulting railway projects in the areas of track and vehicle-track interaction and must perform a range of complex and highly mechanical engineering and technical activities related to railway tracks, underlying structures, and their components. Similar to the occupations relevant to research institutes, graduate engineers are not appropriate for roles such as this, as the level of seniority requires significant experience in the field. Furthermore, the skills and knowledge of these more senior engineers is crucial for enabling skills transfer for new Australian engineers, who will be trained by and learn from these more senior engineers, and thus become able to take on these more senior roles in the future.

Separately, another university with a world-leading research facility focused on the development of innovative astronomical instrumentation, software, and research has noted that engineering for astronomical instrumentation is a very niche career path and as such, the pool of engineers with skills in this area is very small internationally. The projects being developed by this (and similar) research groups in Australia, are highly complex, covering mechanical engineering principles that require significant experience, such as cryogenics and complex high precision opto mechanical designs. These subjects are not taught to any significant detail level within the Australian university system due to their complexities and specialised applications. Therefore, the development of their engineers must be done through mentorship and peer to peer learning. Australia has a significant shortage of individuals with these skills, especially in the areas of operations on large ground-based telescopes, as those facilities are only available in other countries. It is common within the astronomy engineering disciplines, for individuals to work in many different counties to gain necessary experience and advance their skills. The research facility has sought out engineers to enable them to deliver world class instrumentation projects for both land and space-based applications. Their frequent recruitment process has shown that there are not any suitable candidates to meet the requirements who are Australian citizens. Without the ability to recruit internationally, highly-specialised Australian research facilities and groups, such as these, will not be able to deliver on their internationally leading and competitive projects or develop our future engineers.

To remove Mechanical Engineer from the list would have a negative impact on the calibre of talent that Australian universities are able to access for important engineering projects and could jeopardise

ongoing research projects and planned initiatives already in the pipeline at Australian universities. Removal of this occupation also has the potential to impact any projects with industry partners due to a shortage of suitably qualified Mechanical Engineers to take on the work, thus resulting in revenue loss and loss of reputation. Furthermore, removing Mechanical Engineer from the CSOL could threaten future projects and revenue streams for the university if appropriately skilled Mechanical Engineers cannot be found locally. We therefore recommend that Mechanical Engineer be included on the CSOL.

4.2 Advancement Professionals

As mentioned above, Advancement teams do important work for universities. Activities such as alumni relations, fundraising and marketing are key to the functioning and revenue-growth of universities.

Advancement is a relatively new industry in Australian higher education and refers to the move by Australian universities to develop a critical revenue stream targeting high-level strategic philanthropic investment to support Australian universities, thereby enabling research, development and teaching in all fields, including the Australian Government's target sectors of: Advanced Manufacturing, Agri-food and AgTech, Circular Economy, Defence, Digitech, Energy and Renewables, Financial Services and FinTech, and Health Industries. As Advancement departments and roles have only been developed relatively recently by Australian universities and research institutes, following on from examples in the United States (US) and the United Kingdom (UK), where this occupation is far more developed, there is a shortage of experienced advancement professionals within Australia. Indeed, few Australians have ever run $100 million campaigns, yet there are many individuals operating in the US and UK who can list such campaigns on their CVs.

There are a number of occupations that cover a broad range of roles important to university advancement teams that are currently for consultation or have been removed from the list. In particular, the occupation of Program or Project Administrator (ANZSCO 511112) is of particular use to the Sector for filling advancement roles. Since 2017, this occupation has been utilised for migration purposes by at least four large universities on multiple occasions each. Some universities have nominated this occupation to hire foreign nationals in the roles of project and program managers, who engage in dialogues with stakeholders about research and policy in areas critical to Australia, such as security, defence, foreign policy and strategic affairs. A further example is a university that nominated this occupation to fill the role of Project Officer to the Dean of Graduate Studies and has commented on how this occupation covers a broad range of professional project-based roles that can be difficult to fill locally where specialist skills are required.

Similarly, occupations such as Policy and Planning Manager (ANZSCO 132411), Management Consultant (ANZSCO 224711) and Finance Manager (ANZSCO 132211) cover a range of skills that are vital to university advancement teams. Many of the roles that would use one of these ANZSCO occupations impact the ability of universities to attract funding and the viability of business units within universities.

Occupations such as Finance Manager are particularly useful for filling roles relating to grants and contracts. A university has raised the concern that not being able to nominate Finance Managers may impact on securing funding, managing grants and contracts, which would have a detrimental effect on attracting and retaining talented researchers.

Another university has nominated the occupation of Policy and Planning Manager for a foreign national to fill a professional, managerial role at a specialist facility, where this position had remained vacant for over two years and no local applicants possessed the appropriate skillset. There is concern that removing such occupations from the list would have implications for universities who need to hire advancement professionals with very specific skills that are in short supply in Australia, but there is no suitable occupation to nominate them under.

While a number of these roles are hired at senior levels and do offer salaries at over $135,000, the second in command roles do occasionally offer salaries below this level, meaning that they would not be able to make use of the Specialist Skills Stream visa pathway.

Considering the above, we recommend that Program or Project Administrator (ANZSCO 511112), Policy and Planning Manager (ANZSCO 132411), Management Consultant (ANZSCO 224711) and Finance Manager (ANZSCO 132211) are not removed from the list.

4.3 Occupations relating to Cyber Security

This section relates to the following occupations:

a) Cyber Security Engineer (ANZSCO 261315)
b) Cyber security Analyst (ANSCO 262116)
c) Cyber Governance Risk and Compliance Specialist (ANZSCO 262144)
d) Cyber Security Advice and Assessment Specialist (ANZSCO 262115)
e) Cyber Security Architect (ANZSCO 262117)
f) Cyber Security Operations Coordinator (ANSCO 262118)

Cyber security is an area of rapid development and is part of the risk management of many Australian organisations. While these roles are not currently in high demand from our clients, there is a concern among some of our clients that their need to hire from these occupations will increase, and that as demand for such roles increases, it will become more difficult to find Australians for these roles. One university has reported that they are already finding it difficult to fill Cyber Security positions, as there is high demand for cyber security knowledge and skillsets across Australian organisations. Given growing cyber security concerns across the Sector, and Australian organisations, it will be useful to have at least a selection of Cyber Security occupations available on the CSOL to allow Australian organisations the option of finding these important skills offshore when demand in Australia is too high. Therefore, we recommend that the above listed roles are not removed from the list.

4.4 Software Engineer (ANZSCO 261313)

A Head of Research Data & Software at a leading research facility housed at an Australian university has noted that the demand for Software Engineers and their specialisations is higher than ever in the Australian astronomy landscape. The expertise and innovation provided by these specialists are essential for tackling the complex challenges in Australian astronomy research and instrumentation.

As Australia takes part in next-generation international telescope and instrumentation projects and plays a central role in building the Square Kilometre Array (SKA)[18], software engineering is vital to maintaining our nation's advancement and leadership in this dynamic field. Given the expertise and experience required, the global pool of software engineers suitable for astronomy research and instrumentation needs is limited.

Experience and specialised knowledge are typically acquired through involvement in successive international projects at leading observatories worldwide. Consequently, the majority of suitable candidates for these Australian-based projects are international candidates. Therefore, it is crucial for Australian universities to retain the ability to continue recruiting globally and attracting these top-tier experts to Australia. This is key to sustaining Australia's high standing in astronomy and continuing to deliver world-class results.

[18] https://www.industry.gov.au/science-technology-and-innovation/space-and-astronomy/ska-project-australia

4.5 ICT Business Analyst (ANZSCO 261111)

As the industry of online education has grown over the last 20 years, and particularly following the COVID 19 Pandemic, the need for universities to have skilled and knowledgeable ICT Business Analysts to assist with developing appropriate platforms for online learning and online assessments and exams has grown. Competence in areas such as eAssessment and eVigilation continue to be required to support the growth and trajectory of Australian universities in an increasingly online world. In the words of one Group of Eight university, *'These positions require working knowledge of enterprise learning management and electronic assessment platforms, as well as integration of a remote invigilation option to complete the assessment capability as well as enhance the student experience… Removing the ANZSCO code may disrupt workforce planning efforts within universities, impacting strategic decision making relating to the transformation of the university assessment and learning platforms.'*

Online education and assessment are growing areas globally, and the skills and capabilities required to fill these essential roles at universities can be difficult to find locally. The importance of the occupation of ICT Business Analyst to take on roles that support the transformation and uplift of online learning and assessment for universities cannot be understated. Overseas workers who are brought to Australia using this occupation are also essential for transferring knowledge and skills about these emerging areas of technology to Australians. This occupation therefore has strategic value to the higher education sector, and if it were removed from the list would cause disruption. We therefore recommend that this occupation remains is included in the CSOL.

4.6 Veterinary Nurse (ANZSCO 361311)

Australian universities offering veterinarian courses and providing on site practical experience for veterinary students make regular use of the Veterinary Nurse occupation. A number of Australian universities have animal hospitals and require staff for these hospitals 24 hours a day, seven days a week. There is a recognised shortage of veterinarians and veterinary nurses in Australia, with only 10,700 Veterinary Nurses.[19] to look after Australia's 30.4 million pets.[20] Indeed, last year, the New South Wales Parliament held a formal inquiry into the veterinary workforce shortage in the state.[21] The final report is due to be handed down on 28 June 2024.[22]

In their submission to the New South Wales Parliament's inquiry, the University of Adelaide raises the importance of operating veterinary practices with appropriate Veterinary Nurse to patient ratios, noting that recent research has found a substantial reduction in major care errors.[23]

Despite this documented benefit, universities are experiencing significant difficulty in recruiting Veterinary Nurses. Australian universities run veterinary hospitals where research, teaching, and service provision to the public are all core functions. To staff these hospitals, Australian universities seek to employ both Veterinarians and Veterinary Nurses. Given the workforce shortages, it is extremely difficult for universities with veterinary schools to fill these positions. A university responded to our survey noting that the inability to hire veterinary nurses from overseas may impact

[19] https://labourmarketinsights.gov.au/occupation-profile/veterinary-nurses?occupationCode=3613
[20] https://www.parliament.nsw.gov.au/lcdocs/submissions/80455/0201%20Veterinary%20Nurses%20Council%20of%20Australia.pdf
[21] https://www.parliament.nsw.gov.au/committees/inquiries/Pages/inquiry-details.aspx?pk=2964#tab-timeline
[22] Ibid.
[23] https://www.parliament.nsw.gov.au/lcdocs/submissions/80309/0121%20University%20of%20Adelaide%20School%20of%20Animal%20and%20Veterinary%20Science.pdf p. 3.

on the ability of the university to meet its compliance and accreditation standards should they be unable to fill those roles with local talent.

Another university with a veterinary school and an animal hospital in rural Australia has had very low interest in the last two Veterinary Nurse roles advertised, including a role for a Veterinary Nurse team leader. These roles attracted six and nine applicants respectively. The Veterinary Nurse shortage has led to the hospital needing to reduce its hours during periods where it has been short staffed.

In addition to the above, university animal hospitals and veterinary clinics do not only provide veterinary services to animals in the community but are also involved in training students and in undertaking internationally leading veterinary research. This requires specialised skills that may not be available among the current, depleted veterinary nurse workforce, and which are different to those skills required of Veterinary Nurses in commercial practice.

While the market salary for Veterinary Nurses is often below $70,000, universities that run 24-hour animal hospitals are paying their Veterinary Nurse staff over $70,000, as the overnight and weekend work attracts loading and shift allowances, bringing their guaranteed base salary above $70,000. It is therefore appropriate for Veterinary Nurse to appear on the CSOL.

As there are no other suitable occupations available for roles such as these, not being able to hire foreign nationals for these roles would significantly reduce the pool of suitably skilled workers that universities would be able to hire from, and given the pre-existing local shortages in these occupations, would likely result in university veterinary schools and animal hospitals being short staffed. Removing Veterinary Nurse from the list would thus have significant negative implications for some Australian universities.

5. Low Demand but Business Critical Occupations for Universities and Research Institutes

5.1 Librarian (ANZSCO 224611)

The role of university librarian differs significantly from school or community librarians. Librarians employed by universities must be well versed in academic research methods, data management, and scholarly communication, amongst other things. A recent advertisement for a university Librarian required that the suitable applicant have the '*ability to build effective collaborative relationships and engage diverse stakeholder groups*' and must also have *the 'business acumen to deliver efficient and effective services, complex initiatives and projects.'*[24] A different recent advertisement for a university librarian included the following duties:

- Coordinating negotiations with vendors and suppliers regarding pricing and procurement of subscription resources including preliminary assessment of resource licenses to ensure compliance with university and industry accepted requirements.
- Contributing to the development and implementation of effective end workflows in relation to acquisition, description, discovery, and review of scholarly information resources
- Contributing to the compilation and analysis of statistics on print and electronic resources including usage for reporting to internal committees, the Library Annual Report, and other agencies.[25]

Different faculties within each university also have their own head librarian, who must be knowledgeable on the specialised subject matter and research relevant to that faculty.

[24] https://www.timeshighereducation.com/unijobs/listing/371647/university-librarian
[25] https://www.seek.com.au/job/76057696?type=standout&ref=search-standalone&origin=cardTitle#sol=e73506ce062c2157cd09c78cd0cda29695cc6dd1

As evidenced above, each university librarian role requires a Librarian with specialised skills, often specific to the needs of the university. In the past seven years, we have assisted three universities with nominating head librarians. It can therefore be difficult to fill these positions locally. As such, the occupation of Librarian has strategic value to universities, and universities value having the occupation of Librarian available for nominating foreign nationals for these positions.

In addition, the salary for a university Librarian is often below $135,000. For example, the advertised salary for the Victoria University position advertised above was in the range of $94,526 to $102,320. Therefore, these positions are not able to be filled via the specialist skills pathway once that is in place. It is therefore important that the position is included in the CSOL, so that universities are not barred from hiring people with the skills required for the role, where those skills cannot be sourced locally.

We recommend that Librarian not be removed from the list, considering its strategic value.

5.2 Laboratory Manager (ANZSCO 139913)

While this occupation is not currently in high demand among our university and research institute clients, it is important to our clients that they are able to access the largest talent pool possible to apply for these roles. A research-intensive university has noted that laboratory manager is often used for '*highly specialised positions. Usually, a small pool of Australian citizen or permanent residents who have unique training, skills, experience and connections to critical industry and academic contacts.*'

Case Study 4:

A Group of Eight university nominated an individual under the occupation of Laboratory Manager. The nominated salary for this position was $113,472. This role was for a mineral and energy resources engineering laboratory but required the applicant to have experience in operating X-Ray equipment and an appropriate licence. Of the top two applicants for this position, this foreign national was the only one to meet all the criteria and have the relevant certifications and licences for the position. This role would have been difficult to fill had the university not been able to nominate foreign nationals for the position.

It is therefore occasionally necessary for Australian universities and research institutes to utilise the migration program to find suitably skilled and experience Laboratory Managers for their specialist labs. Therefore, the occupation of Laboratory Manager is of significant strategic benefit universities and research institutes and should not be removed from the list.

5.3 Conservator (ANZSCO 234911)

The role of the conservator is to plan and organise the conservation of material and objects in libraries, archives, museums, art galleries and other institutions. Numerous Australian universities maintain collections for both public and private clients that require specific expertise to conserve. Conservators provide specialised care of a range of objects, including paper, books and photographic materials, paintings, frames, organic and inorganic 3D objects, and textiles. A leading Australian university notes that the expertise required for these roles is often*, 'not available locally as they have been trained at global and leading institutions such as from the US, UK and Europe, which have large teams of trained professionals with specialist conservation skills.*' While this occupation may be in low demand in Australia, it is crucial to university collections that those hired to conserve them have received the best training and have the correct specialisation. These niche specialisations can be difficult to fill locally, especially considering most specialist training takes place overseas. Therefore, it would be a significant loss for Australian universities with collections to not have the option of filling vacant conservator roles with foreign talent where no suitable Australian worker is available.

6. Barriers to using other visa pathways

Permanent visa programs, such as the Employer Nomination Scheme (subclass 186) visa and the soon to be replaced Global Talent Independent (subclass 858) visa program (proposed to be replaced by the National Innovation Visa), do not represent alternative visa pathways to the employer-sponsored Temporary Skills Shortage (subclass 482) visa which is proposed to be replaced by the Core Skills Stream visa.

Barriers to utilising, the subclass 186 visa, include that it is more expensive than the temporary sponsored visa pathway and can take up to 12 months of visa processing, whereas 90% of subclass 482 visa applications are processed within 3 months.[26] Further, with respect to eligibility for permanent residence, the subclass 186 Direct Entry stream:

- Has a maximum age limitation of 44 years;
- Requires a positive skills assessment;
- Requires 3 years of full-time work experience for professional occupations;
- Requires the occupation to be on the narrow MLTSSL (currently, occupations on both the STSOL and MLTSSL are available for nomination under subclass 482); and
- Is not available for fractional roles or positions less than 2 years from date of visa approval.

In relation to the subclass 858 Global Talent visa, the pathway is also severely restrictive as it: requires applicants to be able to demonstrate that they will receive annual earnings of at least the Fair Work High Income Threshold (FWHIT), currently $167,500; is only available to highly skilled migrants who are internationally recognised in certain select areas; and involves a protracted Expression of Interest component, where the whole process, including visa processing, could take in excess of 12 months.

7. Caveats

Our submissions demonstrate that the needs of Australian universities and medical research institutes are in some instances unique, while in others, different to other Australian employers. We respectfully submit that Jobs and Skills Australia's assessment should not only include the reasons to include an occupation on CSOL, but also an assessment of the impact of not including an occupation on CSOL. This is particularly important for key sectors of our economy such as the higher education sector, which is a key driver of GDP in Australia; and for the medical research sector, given the priority that the Australian Government places on health and health research, where Australia is a leader, internationally. Not including the above-mentioned occupations in the CSOL, will impact the Sector[27] significantly. Consequently, if the Government is minded not to have one or more of the occupations listed in our submission generally available to all industries, we respectfully submit that those occupations be retained on CSOL with a specific industry caveat enabling nomination by universities and medical research institutes, when seeking to sponsor skilled workers. This will allow the Sector to continue to develop in areas of cutting-edge research, internationally ranked teaching, and to maintain and grow its international reputation.

[26] https://immi.homeaffairs.gov.au/visas/getting-a-visa/visa-processing-times/global-visa-processing-times

[27] The Sector is defined in this submission to include Australian universities as well as medical research institutes that are NMRC approved administering institutions.

8. Conclusion

Key concerns that arise and which have been detailed in the above submissions include that:

i) Australian universities and research institutes predominantly hire Australian citizens and permanent residents but are reliant on foreign nationals to secure temporary visas to fill 5% of their job vacancies. Of this 5%, while the majority are nominated under the ANZSCO occupation of University Lecturer (ANZSCO 242111), approximately 9% are nominated under other occupations, where they bring critical skills not locally available to Australian research projects that are predominantly Australian Government funded. These overseas workers, though low in number, make significant contributions to the competitiveness of these projects internationally. Many of these projects cannot be progressed without the highly specialised and technical skills that they bring, often as a function of their postgraduate qualifications, and postdoctoral experience.

ii) The ANZSCO occupations, as categorised, address a range of roles and positions with vastly different skill and experience requirements. For instance, a Biotechnologist with an undergraduate degree may satisfy the skill and demand requirements of commercial pathology companies or the production-line roles in biotechnology companies, where they are, in a sense, end-users. This differs significantly from the skill and experience requirements in our research facilities that compete on a global scale to be world leaders and innovators in their field, and which require postgraduate and/or postdoctoral training as Biotechnologists to the undertake cutting-edge research that comprises the critical technology that the Australian Government has prioritised for development in Australia. Similar cases can be made for a range of occupations, including Life Scientists, Software Engineers, Mechanical Engineers, and bioinformaticians (Statisticians). Further, it is noted that multi-millions of dollars of Australian Government funding may be compromised, should Australian universities and research institutes be prevented from recruiting internationally to fill these highly specialised roles on a temporary basis, when the skills and experience required cannot be identified locally. The key here is that across industries and employers, the roles filled by a particular ANZSCO occupation are not homogenous, and undergraduate qualifications may satisfy some of these recruitment needs, but in the context of university and research institute recruitment, local undergraduate-will typically not bring the specialist skill and experience required.

iii) Jobs and Skills Australia has been tasked to compile one consolidated list, the CSOL, to support the nomination of overseas workers via the new proposed Core Skills Stream visa where the nominated salary is currently between $70,000 and $135,000 (and as indexed in subsequent financial years). As indicated in Table 1, the majority of these highly specialised roles recruited by universities and research institutes will have salaries, governed by enterprise agreements, and which do not meet the greater than $135,000 salary threshold required for nomination under the Specialist Skills Stream visa. Thus, universities and research institutes will rely heavily on being able to nominate these ANZSCO Occupations under the Cores Skills Stream visa pathway.

We respectfully suggest that in addition to understanding demand and outcomes in order to determine whether an ANZSCO occupation should be included on the CSOL, that further analysis is required, to understand the impact of not including an ANZSCO occupation on the CSOL. This analysis is particularly important in the context of universities and research institutes where the demand for these roles is low, but where the skill level is extremely high (almost invariably postgraduate qualifications and experience as well as a high level of technical skill is required) and where the salary offered will be below the threshold for nomination under the Specialist Skills Stream visa. This is particularly important when

considering that the majority of these roles are funded by Australian Government research funds awarded by the Australian Research Council (ARC),[28] the Medical Research Future Fund (MRFF),[29] the National Collaborative Research Infrastructure Strategy (NCRIS), and the National Health and Medical Research Council (NHMRC),[30] and where the research undertaken is aligned with and meets the objectives of the Australian Government's identified Critical Technologies in the National Interest.[31] We respectfully suggest that if any of the ANZSCO occupations listed in this submission are not to be included on the CSOL for nomination by employers in all industries, that a recommendation be made for their inclusion by the Minister for Immigration on the CSOL where they can only be nominated by universities or by research institutes.

iv) Currently, the MLTSSL is the same list that applies when nominating an occupation for an up to 4-year temporary skills shortage visa via subclass 482 or when nominating for permanent residence under subclass 186. It is, unclear, which list will apply for nomination for permanent residence under subclass 186, once the CSOL is introduced. If the MLTSSL with its current listing of ANZSCO occupations will no longer apply for nomination for permanent residence and if the MLTSSL will be replaced by CSOL for nomination for permanent residence, then we reiterate yet again, that the loss of any of the ANZSCO occupations listed in submission will detrimentally impact universities and research institutes as they seek to recruit overseas workers who will only consider relocating to Australia if they are confident of a viable path to permanent residence, before moving across the globe to take up a role here.

We thank Jobs and Skills Australia for its time in considering these issues and how the inability to access a low volume of key occupations that are filled by foreign nationals with highly specialised, world-leading, and often niche skills, not locally available, will significantly impact Australian research and teaching, and indeed, Australia's world-leading position in this regard, should they be removed from the CSOL.

Visa Lawyers Australia and the participating universities and research institutes thank Jobs and Skills Australia for the opportunity to provide these submissions outlining the concerns and interests of the Sector. We appreciate time taken by Jobs and Skills Australia to review this submission and urge Jobs and Skills Australia to consider the strategic value of the above listed occupations to the Sector.

For and on behalf of

Australian Catholic University
Charles Darwin University
CQUniversity Australia
Curtin University
Edith Cowan University
Flinders University
Griffith University
James Cook University
Monash University
Murdoch University
Macquarie University
The University of Adelaide
University of Canberra
The University of Melbourne
The University of New South Wales
The University of Queensland
The University of South Australia
Victor Chang Cardiac Research Institute
Walter and Eliza Hall Institute of Medical Research

[28] https://www.arc.gov.au/
[29] https://www.health.gov.au/our-work/medical-research-future-fund
[30] https://www.nhmrc.gov.au/
[31] https://www.industry.gov.au/publications/list-critical-technologies-national-interest

Please direct requests for further information or clarification in relation this submission, please contact:

[redacted]

VLA Survey to support submission on behalf of universities and research institutes in response to Jobs and Skills Australia's call for feedback on draft Core Skills Occupations List (CSOL)

Name:	[redacted]
email:	[redacted]
Organisation:	[redacted]
Please confirm your organisation can be listed as one of the respondents in our submission:	☒Yes ☐ No
Any General Comments:	

1. *Please complete the Jobs and Skills Australia (JSA) Survey by 10 May 2024 – located:* https://www.jobsandskills.gov.au/topics/migration-strategy/draft-core-skills-occupations-list-csol-consultation#surveyandsubmissio *(please see attachment for VLA comments on survey)*
2. *To assist in us in drafting a submission (due 31 May 2024) on behalf of universities and research institutes, please complete and return this VLA Survey by 10 May 2024 to:* [redacted]

In the table below, please enter ANZCO Occupations from the 'For Consultation' list and 'Removed' list and note why these are important to your institution and how the loss of these occupations for employer nomination will detrimentally impact your organisation. (In Attachment 1, VLA has provided a list of occupations commonly nominated by universities/research institutes – please comment on these and any others on the JSA lists that concern you.)

ANZSCO Occupation	• **In what context do you employ this occupation?** • **What are your organisation's reasons for requesting that it be retained?** • **What would be the impacts of losing this occupation on your organisation?** • **Should any special conditions apply if retained? (eg, higher salary / 5 years work experience / specialised roles?)**
111211 - Corporate General Manager	• Executive Director / Director • Provides leadership, direction, and management to ensure the financial viability and reputation of the University.
134411 - Faculty Head	• Faculty Dean / Head of School • To main international reputation for excellence and innovation in research and curriculum development. Continue to develop international and corporate partnerships. • Often, the foreign nationals recruited into these roles have internationally leading and global experience that brings strategic benefit to the role, which positions the University competitively internationally, and brings strategic benefit to the University that is not available locally.
224711 - Management Consultant	• Business Analysts – Projects and Initiatives • Provides valuable insights and expertise on University opportunities, financial strategies, and global expansion efforts. Focuses on investment, data and financial modelling, business cases, and feasibility studies. • Could lead to a loss of specialised expertise in areas like global market analysis and international business strategy, limiting the University's ability to understand international trends and respond effectively. May impact strategic initiatives related to

	international and global partnerships, potentially affecting the University's competitiveness.
511112 - Program or Project Administrator	• Project and Program Managers • High-quality research and policy dialogues and engagement in areas of security, defence, foreign policy and strategic affairs critical to both Australia and internationally. •
225311 - Public Relations Professional	• STEM Development Manager • Focuses on high volume discovery and qualification of prospective major donors, which have not yet established a philanthropic relationship with the University. • Could lead to a decline in funding for STEM-related initiatives. Without someone actively seeking out and securing major gifts, the University may struggle to meet targets and support important projects and programs. May impact the University's ability to attract and retain talented researchers, educators, and staff.
132211 - Finance Manager	• Grants and contracts consultant • Experience with Commonwealth and State grants, international and industry projects and sub contracts. Liaising with Government departments, charitable bodies, hospitals, research institutes, commercial supporters and overseas granting bodies and aid agencies • Impact on securing funding, managing grants and contracts effectively, project scope, research and programs. Lack of funding may impact the University's ability to attract and retain talented researchers, educators, and staff.
234511 - Life Scientist (General)	• Cytometry Platform Senior Technical Specialist • Provision of advanced cytometry services. Supporting the daily setup, quality control and operation of platform analysers and cell sorters. Provides high-level expertise, advice, and assistance to researchers to undertake research projects utilising platform equipment. International academics and industry professionals facilitate crucial knowledge transfer and strategic partnerships. • Not being able to recruit in this occupation could restrict opportunities for interdisciplinary collaborations within the life sciences community, impacting the University's reputation as a hub for innovative research and knowledge exchange.
234911 - Objects Conservator	• Objects Conservator • Specific expertise required for conservation work for the University's collections, and for both private and corporate clients. Areas of conservation specialisation include paper, books and photographic materials, paintings, frames, organic and inorganic 3D objects and textiles. • Often the expertise required in these roles are not available locally as they have been trained at global and leading institutions such as from the US, UK and Europe, which have large teams of trained professionals with specialist conservation skills

	• Not being able to nominate such highly skilled individuals may compromise the longevity of the Universities collections and also the ability to train these skills through skills transfer to our local employees
139913 - Laboratory Manager	• Research Assistant – Specialist • Highly specialised positions. Usually, a small pool of Australian citizens or permanent residents who have unique training, skills, experience, and connection to critical industry and academic contacts. • Collaborating with national and international academics and industry practitioners guarantee critical knowledge transfer and strategic collaboration. The ability to bring international specialists to the University forms an important part of the University's ambition to provide staff and students with the opportunity to acquire and develop the specialised skills necessary.

- *Please insert more rows as required*

Please review VLA Attachment 1 (VLA Data) and VLA Attachment 2 (Q3 of JSA survey) prior to responding to JSA and VLA surveys.