



Migration Institute
of Australia

Review of the Points Test

May 2024

Migration Institute of Australia

The Migration Institute of Australia (MIA) is the oldest professional association representing migration professionals in Australia, being initially established as the Australian Migration Consultants Association in 1987, before changing its name to the MIA in 1992. Through its public profile the MIA advocates the value of migration, thereby supporting the wider migration advice profession, migrants and prospective migrants to Australia. The MIA represents its members through regular government liaison, advocacy, public speaking and media engagements. The MIA supports its members through its separate but interrelated sections: professional support; education; membership; communications; media; business development and marketing.

The MIA operates as a company limited by guarantee under the Corporations Act 2001 and complies with all Australian Securities and Investments Commission (ASIC) requirements. The MIA is not empowered under its Constitution to pay dividends. The MIA and its elected office bearers are guided by the legal framework set out in the Corporations Act 2001, the MIA Constitution and Rules, the Corporate Governance Statement and Board Charter.

MIA members hold a further responsibility to their clients and the Australian community to abide by ethical professional conduct and to act in a manner which at all times enhances the integrity of the migration advice profession and the Institute. MIA members are bound by both statutory Code of Conduct of the Office of the Migration Agents Registration Authority which sets the profession's standards of behaviour and the MIA Members' Code of Ethics and Practice.

Statement of Recognition

The Migration Institute of Australia acknowledges the Traditional Custodians of the lands and waters throughout Australia. We pay our respect to Elders, past, present and emerging, acknowledging their continuing relationship to this land and the ongoing living cultures of Aboriginal and Torres Strait Islander peoples across Australia.

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27 May 2024

The Migration Institute of Australia welcomes this opportunity to provide feedback to this Department of Home Affairs *Review of the Points test* for potential migrants to this country.

The MIA is the leading Australian professional association for Registered Migration Agents and legal practitioners. MIA members provide a representative sample of the migration advice profession, operating across the range of practices in this unique sector from sole practitioner to large corporate migration advice organisations.

This submission reflects the collective knowledge and opinions of MIA members, obtained through methods including individual members' feedback. This submission provides MIA members well-considered thoughts on the skilled migration points test and its success in selecting those migrants who can make significant contributions to the Australian economy.

Please feel free to contact the MIA on 02 9249 9000 or bronwyn.markey@mia.org.au if further assistance is required in relation to this matter.



Reuben Saul
National President
Migration Institute of Australia

MIA Recommendations

1. The MIA recommends that the specialist education points criteria be removed from the revised points test.
2. The MIA recommends that the professional year points be removed from the revised points test.
3. The MIA recommends that regional study be removed from the revised points test.
4. The MIA recommends that credentialled community language points be removed from the revised points test.
5. The MIA recommends that the requirement for an onshore applicant to hold a skilled job before being eligible to apply for a points tested visa not be adopted.
6. The MIA recommends that points be awarded for the level of qualification gained onshore from an accredited education provider
7. The MIA recommends that both onshore and offshore applicants should be awarded the same number of points for one, three and five years of work experience.
8. The MIA recommends that a further five points should be awarded to those applicants who gain a minimum of twelve months Australian work experience within the last five years.
9. The MIA recommends that occupation lists continue to be used as a threshold eligibility requirement for the points tested visa pathway.
10. The MIA also recommends that the occupations on the skills lists be more broadly defined, through the use of the ANZSCO four digit Unit Group codes

11. The MIA recommends that maximum age points be awarded to the 25-35 year old skilled migrant age group, with a depreciating scale between 35 and 45
12. The MIA recommends that the skilled partner points be increased and that educational qualifications and English language ability be separated within the criteria.
13. The MIA recommends that the skilled partner points be increased and that educational qualifications and English language ability be separated within the criteria.
14. The MIA recommends the release of the new points test criteria at least six to twelve months before the test is implemented
15. The MIA recommends that the points test be reviewed in period of not less than five years and no greater than eight years.

Background

1. The Migration Institute of Australia (MIA) welcomes the opportunity to provide input to the Department of Home Affairs *Review of the Points Test*.
2. Australia's skilled migration program is designed to select those migrants who can make significant contributions to the Australian economy, fill skills shortages and assist in stimulating economic growth.¹ The skilled program is comprised of two main skilled pathways, the points tested pathway (subclasses 189, 190 and 491) and the employer sponsored pathway (subclasses 186 and 494).
3. While the objectives of both of these skilled streams are ostensibly the same, their focus is somewhat different. The employer sponsored pathway provides a mechanism to address short term and more immediate skills shortages. This shorter term perspective is reinforced by requirements of this visa class, which include recent labour market testing and genuine positions that cannot be filled.
4. Varela and Breunig (2024) have identified the employer sponsored demand driven pathway as the most successful in promoting positive skilled migration outcomes.² However, this stream cannot be relied on to address future skills needs or to build a diversity of skills and experience within the Australian population. The points tested stream provides more scope to address Australia's longer term and future emerging skills needs, and to build Australia's store of human capital.
5. The General Points test as set out in Schedule 6D of the Migration Regulations 1994, is designed to assess the personal attributes of potential migrants against those attributes that predict successful skilled employment outcomes and settlement in Australia.
6. A version of the points test has been used for many years in Australia. While designed to maximise the benefit of this skilled migrant workforce to the Australian economy, the points tests have been periodically adjusted as various governments' economic and other priorities have changed. The current version of the points test was released in 2012, with some revision of work experience points

¹ Department of Home Affairs website: <https://immi.homeaffairs.gov.au/what-we-do/skilled-migration-program/overview>

² Varela and Breunig, Determinants of economic outcomes for Australian permanent migrants, Crawford School of Public Policy, Australian National University, 2024, p13.

occurring in 2014, skills assessment requirements in 2016 and further minor administrative updates in 2016.³

7. Adjustments to the tests over time to support other broader government objectives, such as attempts to strengthen regional settlement and to support the international education industry, have effectively diluted the current points test to the extent that it is no longer fit for purpose.
8. Various authorities have identified issues with the current points test that for example, encourage international students to arrange their study programs and lives around maximising their points tallies for instance, by only studying courses on the occupation list or at education facilities in regional areas. The current test can be manipulated in this manner to produce skewed results that favour new graduates with a host of points that bear no relation to successful labour market outcomes, over more highly qualified and experienced offshore professionals.
9. Within this context, the MIA supports the recommendation of the Migration Strategy Review panel that the points test be recalibrated. However, the MIA contends that the benefits to the skilled migration program and economy will only be maximised if the points test returns to addressing those specific objectives that identify those skilled migrants who will be most successful in obtaining skilled employment and be of most benefit to Australia in the longer term.

Question One: How can we design the points test to best target migrant success in finding a skilled job?

What should the minimum eligibility requirements for the points test be?

10. The current points test requires migrants to be below the age of forty five, have Competent English, an occupation on a skills list, with associated relevant qualifications and work experience. The threshold points test score is set at 65 points.
11. The MIA is supportive of similar minimum eligibility requirements remaining.

³ Migration Regulations, Schedule 6D, General Points Test for Skilled Migration visas mentioned in Subregulation 2.26C(1)

What criteria should be included? What criteria should be removed?

12. Numerous studies have demonstrated the core personal attributes that improve skilled migrants' success in the labour market, including age, educational qualifications, work experience and English language ability.⁴
13. The current points test gives weight to these known predictors of success, yet it also provides points for attributes and behaviours with little connection to employment success. However, international graduates can boost their tally, collecting points that show no evidence of improving employment outcomes.
14. The MIA supports the retention of all current points test criteria, with the exception of the specialist education, professional year, regional study and credentialled community language criteria.
15. Specialist education points were introduced in 2016, a general push across Australian education at that time amid claims of future shortages in these disciplines. However, Australia's Chief Scientist's reports on Australia's STEM Workforces in 2016 and 2020, make no mention of skills shortages in these disciplines.⁵ These points are underutilised, with less than 2% applicants claiming these to February 2021 or 130 skilled independent visa applications, with apparently little change since then.⁶

Recommendation 1

The MIA recommends that the specialist education points criteria be removed from the revised points test.

16. Professional years were introduced as a recommendation of the Birrell Report in 2008,⁷ with the intent of improving the employment outcomes of international graduates. However, graduates of only three disciplines have the opportunity to undertake these courses: engineering, computing and accounting.

⁴ Including Continuous Survey of Australia's Migrants; The Lifetime Fiscal Impact of the Australian Permanent Migration Program: Person level Integrated Data Asset.

⁵ Finkel A, Australia's STEM Workforce, 2016 Office of the Chief Scientist https://www.chiefscientist.gov.au/sites/default/files/Australias-STEM-workforce_full-report.pdf; Finkel A, Australia's STEM Workforce, 2020 Office of the Chief Scientist, https://www.chiefscientist.gov.au/sites/default/files/2020-07/australias_stem_workforce_-_final.pdf;

⁶ Coates B, Sherrell H and Mackay W. Rethinking permanent skilled migration after the pandemic, Grattan Institute, 2021, p 90.

⁷ Birrell B, Hawthorne L & Richardson, S. Evaluation of the General Skilled Migration Categories, Department of Immigration and Multicultural Affairs. 2006, p 170.

17. A large number of providers now present these courses and anecdotal evidence suggest that a significant number may not be meeting the objectives originally proposed by Professor Birrell et al,⁸ even though they commonly cost the migrant around \$15,000.
18. The professional year criteria are discriminatory to other international graduates, given that only certain graduates have the opportunity to access these points, creating an unfair advantage for those graduates. This criteria also essentially provides the opportunity for those graduates to 'purchase' extra points.

Recommendation 2

The MIA recommends that the professional year points be removed from the revised points test.

19. The regional study points stand alone in being externally focussed and not a personal attribute of the applicant. These were adopted as a measure to increase regional populations and improve regional economies.
20. Unlike other points tested attributes, they do not create a transferable attribute that will improve employment outcomes for the applicant, in same way that attaining higher qualifications or extra work experience would. Additionally, these points advantage international graduates over other offshore skilled migrants for little return.

Recommendation 3

The MIA recommends that regional study be removed from the revised points test.

21. It is difficult to understand why credentialled community language points are included in the points test. While possessing more than one language may be of benefit in some occupational roles, it is not a universal benefit within the Australian labour market. There appears no justification for continuing to reward applicants with points for this attribute in a skilled migration program.

⁸ The professional years were intended to combine technical knowledge and practical on-the-job experience to facilitate employment in Australia at the professional level, Birrell et al 2006, p 172.

Recommendation 4

The MIA recommends that credentialled community language points be removed from the revised points test.

22. While it seems attractive that onshore applicants have a skilled job to be eligible to apply for a points tested visa, this notion is problematic. It is of significant concern to the MIA that such a requirement would encourage exploitation of applicants and the fraudulent activity that is evident in other similar visa pathways.
23. It is well recognised that unscrupulous employers exploit migrants dependent on employment or working visas to obtain permanent residency. Charging workers for sponsorship, underpayment, clawing back wages and sexual abuse are commonly reported by vulnerable migrants. Similarly, complicit behaviours by applicants have been identified within this same context.
24. This potential for exploitation and fraudulent activity leads to the MIA to strongly oppose applicants being required to have skilled employment before applying for a points tested visa
25. This requirement also carries the risk of encouraging a further form of ‘permanent temporariness’ with applicants using other visas to remain in the country, while they attempt to obtain suitable skilled employment.

Recommendation 5

The MIA recommends that the requirement for an onshore applicant to hold a skilled job before being eligible to apply for a points tested visa not be adopted.

26. The MIA does support the maintenance of Australian study points, suggesting this demonstrates suggests a commitment to Australia by those international students who have undertaken Australian qualifications. Varela and Breunig have demonstrated that those who have held a previous temporary visa in Australia have better economic outcomes than other applicants.⁹

⁹ Varela and Breunig, Determinants of economic outcomes for Australian permanent migrants, Crawford School of Public Policy, Australian National University, 2024, p 18.

27. In recognition that higher skills levels equate to better economic outcomes,¹⁰ the MIA further recommends that points for Australian study be given more weight based on the level of formal Australian qualification attained.

Academic Award	Points
Certificate III, IV or Diploma	5
Bachelor or Masters degree	10
PhD	15

Table1: MIA proposed points for Australian educational qualification

Recommendation 6

The MIA recommends that points be awarded for the level of qualification gained onshore from an accredited education provider

How should the points test account for migrants' experience? How should domestic versus international experience be treated? How should it reflect quality of experience?

28. The current points test weights Australian work experience more heavily than overseas work experience. While studies demonstrate that Australian work experience is an important element in supporting successful employment outcomes, migrants' overseas experience can also be beneficial within the Australian context of developing local skills, products and international markets.
29. The current points test requires greater periods of overseas work experience to obtain the same points as for Australian work experience. Separating the location of the work experience into onshore and offshore leads to possible unfair disadvantage within the current points test.
30. As skilled work experience is a predictor of successful labour market outcomes, it should be more equitably recognised. An applicant, for example, with two years and eleven months professional experience overseas and with eleven months professional experience in Australia, will receive zero points for work experience, despite having close to four years work experience.
31. The MIA contends that all skilled work experience should be recognised equally despite location, with extra points awarded where some of this experience occurred onshore. In this way overseas experience would be weighted more

¹⁰ Varela and Breunig, Determinants of economic outcomes for Australian permanent migrants, Crawford School of Public Policy, Australian National University, 2024, p 14.

comparatively to onshore, while still maintaining the benefit of onshore experience in successful outcomes.

Points	Current Australian experience	Current overseas experience	Proposed work experience
5	1 year	3 years	1 year
10	3 years	5 years	3 years
15	5 years	8 years	5 years
20	8 years		
5			Australian work experience minimum 12 months in the last 5 years

Table 2: MIA proposed work experience points

Recommendation 7

The MIA recommends both onshore and offshore applicants should be awarded the same number of points for one, three and five years of work experience.

Recommendation 8

The MIA recommends that five points would be awarded to those applicants who gain a minimum of twelve months Australian work experience within the last five years.

32. It is difficult to suggest how the quality of work experience can be reflected the current quantitative points test model. This model is designed to objectively measure applicants' personal attributes, yet quality of work experience requires subjective assessment of this attribute.
33. To incorporate points for the quality of work experience would be problematic and require a suitable proxy. Examples such as work experience in a first world country, by size of organisation or by industry sector were considered by the MIA but discarded as too generalised, subjective and complex for inclusion as a proxy.
34. Work experience for example, within a large, advanced economy 'tech' company may provide high quality experience but could equally silo applicants to narrow work assignments. Similarly, a registered nurse working in a large public hospital might not gain the breadth of professional experience that they could in a smaller community hospital.

35. The MIA believes that it is unlikely that a suitable valid proxy for quality of work experience could be identified and incorporated in the points test.

Question Two: How can we better target points tested visas to meet Australia's skills needs?

Are occupation lists an appropriate way to target skills? If so, what should be considered in compiling them?

36. The use of occupation lists within the skilled migration program receives a great deal of criticism, although this is usually attached to structural issues, such as too many different lists and inflexibility in the face of rapidly changing economic environments and emerging technologies.
37. If these issues were to be addressed, and some may be with the advent of the new Core Occupational Skills List, the MIA considers that occupation lists could still be an appropriate way to target skills for migration.
38. The Grattan Institute has previously suggested removing occupation lists in favour of using wage thresholds to determine those applicants who would be most successful within the Australian labour market and of most benefit to the Australian economy.¹¹
39. While the MIA commends the Grattan model for moving the focus away from the short term skills shortages usually targeted by occupational lists and towards a model with human capital building potential, the MIA is concerned that the unfettered, 'first come, first served' model using skills levels will not ensure a sufficient supply or diversity of skills to ensure Australia's broader economic success.
40. While the occupational profile of skilled applicants may spread evenly across the points tested migration intake, the possibility equally exists that this may not occur. This has been demonstrated by the new Specialist Skills pathway visa which uses a salary floor of \$135,000 to determine those applicants most likely to be innovative, possess high level skills and create jobs with the economy.

¹¹ Grattan Institute, Australia's migration opportunity: how rethinking skilled migration can solve some of our biggest problems. 2022, p 43.

41. The Specialist Skills pathway has already been compromised demonstrating that high salaries and high skills levels do not always correlate and further limitations have been required to ensure highly paid trades, machinery operators and labourers are not eligible for this visa.¹²
42. In the absence a viable alternative to determining those occupations that will address longer term shortages and emerging skills requirements, the MIA recommends that occupation lists continue to be used as a threshold eligibility requirement for the points tested visa pathway.

Recommendation 9

The MIA recommends that occupation lists continue to be used as a threshold eligibility requirement for the points tested visa pathway.

43. To address the inflexibility of the occupation lists, MIA also recommends that the occupations on the skills list/s be more broadly defined, through the use of the ANZSCO four digit Unit Group codes rather than the more specific and restrictive six digit Occupation Groups codes.
44. ANZSCO four digit Unit Group codes provide the indicative skills level required, necessary qualifications and/or work experience, registration or licensing requirements and an overview of the occupational tasks the skilled applicant would be expected to be able to undertake.
45. The use of the four digit codes would allow a broader range of skilled applicants to apply for the points tested visas, in a more flexible and similar manner to that suggested by the Grattan's skills levels model, while enabling the government to apply some control to the occupational intake.

Recommendation 10

The MIA recommends that ANZSCO four digit Unit Group codes be used to define occupations on future Skilled Occupation Lists.

¹² Migration Strategy <https://immi.homeaffairs.gov.au/programs-subsite/migration-strategy/Documents/migration-strategy.pdf> p 49.

Question Three: How should we redesign the points allocated to age to better select younger migrants?

46. The MIA questions the implicit assumption in this question that a younger applicant is a better applicant. While a younger applicant would appear to offer the best economic return over the long run due to their years in the labour force, an older applicant with a higher income can produce the same return over a more immediate timeframe.
47. While targeting younger applicant is thought to increase their time in the labour market and defer the costs that accrue as a person ages, this is highly reductive. Young single migrants, especially those with transportable professional qualifications, are often highly globally mobile. Arguments that young applicants are of greater benefit because they stay longer in the Australian labour markets, may not necessarily reflect reality for these younger age groups.
48. It is not uncommon for young skilled migrants to live and work in Australia until they gain citizenship and then relocate overseas for employment and other lifestyle experiences. Equally, younger migrants may have less responsibilities making it easier to relocate and may choose different ways of working over time that do not reflect these economic models.
49. For partnered or skilled migrants with families, the decision to relocate to a new country requires greater consideration of the impact on multiple family members and may not be undertaken as lightly as it would by a young single applicant. It is more difficult to uproot a family and working partner. This suggests that these migrants may be more stable and longer term permanent settlers in Australia than single applicants.
50. Varela and Breunig demonstrate that while migrants with secondary applicants may initially be older, this effect is ameliorated when their partners and children invariably enter the workforce, with the economic outcomes of children who arrive as migrants before 18 equivalent to those of Australians.¹³

¹³ Varela and Breunig, Determinants of economic outcomes for Australian permanent migrants, Crawford School of Public Policy, Australian National University, 2024, p 24-25.

51. For these reasons, the MIA supports points being applied to a broader age band than currently occurs. The MIA favours a model that provides a more nuanced approach to age points as utilised in the Canadian model,¹⁴ where maximum points are awarded for those between 20-30 with a stepped down scale to 45 years of age.

52. The MIA recommends that maximum age points be awarded to the 25-35 year skilled migrant age group with a depreciating scale between 35 and 45 in recognition that these are usually the peak years of building both careers and having families. In this model, illustrated below, applicants do not suffer the sudden drop off in points after 35, but by 45 will be receiving the same number of points as under the current points test.

Points	Age at invitation
25	not less than 18 and under 25
30	not less than 25 and under 35
29	not less than 35 and under 36
28	not less than 36 and under 37
27	not less than 37 and under 38
26	not less than 38 and under 39
25	not less than 39 and under 40
24	not less than 36 and under 37
23	not less than 36 and under 37
22	not less than 37 and under 38
21	not less than 38 and under 39
20	not less than 39 and under 40
19	not less than 40 and under 41
18	not less than 41 and under 42
17	not less than 42 and under 43
16	not less than 43 and under 44
15	not less than 44 and under 45

Table 3: MIA Proposed points test for age

Recommendation 11

The MIA recommends that maximum age points be awarded to the 25-35 year skilled migrant age group with a depreciating scale between 35 and 45 years old.

¹⁴ Points Test Review Discussion paper, Department of Home Affairs, 2024, p 13.

Question Four: How should we design the points allocations for partners to best reflect their potential labour market contributions?

53. In line with the MIA's contention that primary applicants with dependents potentially add greater value in the Australian labour market and to the economy than single skilled applicants, it is proposed that skilled partner points also reflect this contribution.
54. Studies of secondary applicants' labour market outcomes examine factors such as English language ability, educational qualifications and age in determining economic outcomes. The current points test uses a skills assessment and English to provide a measure of the skilled partner's potential economic outcome and value.
55. The current test combines a positive skills assessment and English ability to provide maximum points. Given the changes occurring with the Jobs and Skills Australia Core Skills list, the Consultation on Skills Assessing Best Practices and other moves to simplify the recognition of overseas qualifications and skills, possession of a skills assessment may not remain a viable criteria for partner points.
56. The MIA suggests a more nuanced approach to assessing the value of partners' employment potential be used. This model recognises the level of educational qualifications and English language ability separately.

Points	Current partner points	Points	MIA proposed partner points
10	Partner holds a skills assessment for an occupation on an occupation list	5	Certificate III or higher ¹⁵
		10	Bachelor degree or higher ¹⁶
5	Partner has Competent English	5	Competent English
		10	Proficient English
10	Applicant as no or Aust'n partner	20	Applicant has no or Aust'n partner

Table 4: Current partners points test and proposed MIA points test

¹⁵ Where formal vocational and technical education qualifications are not held, the option to Recognition of Prior Learning or skills assessment would be offered as an alternative.

¹⁶ The equivalence to Australian qualifications would be assessed using the Department of Education's Country Education Profiles

57. In this model zero points would be achieved where the partner has no qualification and very low English ability, while a maximum of twenty points could be achieved for a tertiary qualification and high level of English. Skilled applicants without partners or with Australian partners would be awarded the maximum points as currently occurs.
58. Decoupling the qualifications and English language ability allows a partner applicant to still have their educational qualifications recognised, even where they cannot meet the threshold requirement for English ability.
59. While the MIA recognises the potential for fraudulent use of partner points, this increase has been kept to a relative low level to provide less incentive for this type of fraud.

Recommendation 12

The MIA recommends that the skilled partner points be increased and that educational qualifications and English language ability be separated within the criteria.

Question Five: How could the points test support gender equality in the Australian labour market?

60. Given that many of the issues surrounding gender inequality in Australia are structural rather than the result of the migration program, it may be argued that it will be difficult to effect change within the points test that can specifically address this larger societal issue.
61. Programs for improving gender equality within the labour market generally focus on improving pay equality, the removal of barriers to the full participation by women, access to all occupations and industries, and the elimination of discrimination.¹⁷
- 62.

¹⁷ Australian Government, Workplace Gender Equality Agency, <https://www.wgea.gov.au/about/workplace-gender-equality>

63. The MIA suggests that a more appropriate means of addressing this inequality is through broader societal programs. Such programs would, by default, also address gender equity issues for skilled migrants. However, equal access for skilled migrants to those programs and services accessed by working Australians, such as flexible working arrangements, childcare, education and training, must be guaranteed.
64. While it is recognised that the skilled migration program is biased towards younger male applicants, more specific attempts to address gender equity issues may impact the balance of points resulting in unintended consequences. As such, any changes would need to be carefully modelled and assessed.
65. However, the MIA's has provided some suggestions for equity improvement with its proposed partner points criteria, which provide greater recognition of partner skills.
66. The MIA contends that the points test is not a suitable vehicle for addressing gender equality issues, but that the Government should provide increased funding to those programs and resources that support and enhance gender equity for the whole of Australian society.

Question Six: How should transition arrangements for the points test reforms work?

67. There will never be an optimal date for transitioning to a new points test and it is inevitable that some applicants will be advantaged and others disadvantaged.
68. The changes to the points test should be released well in advance of its introduction and be strongly promoted to allow applicants, especially those onshore, to reassess and adjust their pathways.
69. The MIA recommends the release of the new points test criteria at least six to twelve months before the test is implemented, to allow the highest possible proportion of current international students to complete their onshore courses and adjust their plans.¹⁸

¹⁸ The Department of Home Affairs should be able to assess this date from student enrolment and course data. The date may either favour students completing at the end of spring semester or at the end of the autumn semester.

70. The Home Affairs IT system will require extensive testing to ensure it is adequate to cope with the expected substantial number of applicants who will lodge new applications, as soon as the new process comes online and which is the time that the Department's system historically fails.
71. Applicants already invited and those who have lodged applications should continue to have their applications assessed under the previous guidelines and criteria.

Recommendation 13

The MIA recommends the release of the new points test criteria at least six to twelve months before the test is implemented.

Question Seven: How regularly should the points test be reviewed? What should reviews consider?

72. To maintain the value of the points test as a predictor of successful labour market outcomes, it must be reactive to economic and other societal change. However, it cannot change so frequently that it creates insecurity and distress amongst potential applicants and drive them to other destinations.
73. The MIA recommends that the points test reviewed in period of not less than five years and no greater than eight years.
74. The five year span gives international students and offshore applicants the certainty that they can complete a formal qualification, gain work experience and undertake other activities that will still be relevant to the test over that time.
75. The current points test has not been comprehensively reviewed since it was introduced in 2012, some 12 years ago. The Migration Strategy found that the test was no longer fit for purpose. It is for this reason that the MIA considers the eight years the upper end of the life of a points test.

Recommendation 14

The MIA recommends that the points test reviewed in period of not less than five years and no greater than eight years.

