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Hon Jason Wood MP  
Assistant Minister for Customs, Community Safety and Multicultural Affairs  
PO Box 6022  
House of Representatives  
Parliament House  
Canberra ACT 2600

25 June 2021

Dear Assistant Minister,

### **Consultation Report: Migration Agents Instruments Review**

Thank you for the opportunity to provide a response to the *Migration Agents Instruments Review* consultation report (the consultation report).

As a leading professional services firm, KPMG Australia (KPMG) is committed to meeting the requirements of all our stakeholders – not only the organisations we audit and advise, but also employees, governments, regulators and the wider community. We strive to contribute to debate that seeks to develop a strong and prosperous economy and welcome the opportunity to provide a response to the consultation report.

KPMG currently employs 25 staff in its Immigration Services business, which was established in 1988 with a focus on providing immigration advice and assistance to businesses looking to access the various employer sponsored visa categories. The KPMG immigration team collectively has a wealth of technical and practical experience across all immigration matters and draws from many years of experience working in the immigration consulting industry, including within government agencies and in-house global mobility teams.

KPMG welcomes the consultation report and is supportive of reforms and legislation that promote a highly qualified and professional migration advice industry. The Australian migration advice industry has supported Australia to become one of the most successful multicultural societies in the world, and will continue to play an important role as migration is integral to Australia's economic prosperity and recovery from COVID-19. Given the critical role that registered migration agents (RMAs) play in facilitating migration to Australia, it is also important that the Australian Government has the ability to effectively combat misconduct and unlawful operators.



KPMG supports the proposal to update the Occupational Competency Standards for RMAs to include English language requirements, increasing the level of English required for registration as an RMA to 'proficient' English. We note that the current English language requirements are inconsistent with those of comparable occupations in Australia, and lower than the requirements for persons providing immigration assistance in Canada and New Zealand.

Further to this, KPMG would welcome the introduction of a mandatory 12-month provisional license for newly registered migration agents, who would operate under the supervision of a fully licensed RMA and would be limited in the type of immigration assistance they can provide. Practicing under a fully licensed RMA would be valuable to newly registered agents to gain both experience and foundational professional guidance, particularly since 40 percent of the industry operate as sole traders.

KPMG supports steps that would increase the professionalism of the migration advice industry, including the introduction of a three-tier system of registration for RMAs that provides a graduated approach to RMAs' career progression. Additionally, KPMG welcomes the proposal to review the Continuing Professional Development (CPD) arrangements, including strengthening oversight of CPD, introducing new quality control for CPD activities and clarifying CPD provider standards.

While KPMG supports these important reforms which seek to elevate the profession, we note that consideration should be given to how the new qualification requirements will be applied to RMAs who have practiced for a significant period of time. The review could consider applying a professional recognition framework for those with extensive experience in the industry to ensure they are not adversely impacted by changing requirements.

KPMG is supportive of the proposed measures aimed at combatting misconduct and unlawful activity in the migration advice industry and we would be happy to discuss this important matter further at any stage.

Yours sincerely,

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