

**APS Submission  
to the  
Australian Government  
Department of Immigration and Border Protection  
On  
Discussion Paper (September 2014):  
Reviewing the Skilled Migration and  
400 Series Visa Programmes**

APS contacts:

Dr Sabine Hammond  
Executive Manager  
Science, Education and Membership  
[s.hammond@psychology.org.au](mailto:s.hammond@psychology.org.au)

Level 11, 257 Collins Street  
Melbourne VIC 3000  
PO Box 38  
Flinders Lane VIC 8009  
T: (03) 8662 3300  
F: (03) 9663 6177  
[www.psychology.org.au](http://www.psychology.org.au)

---

## **APS Response to Discussion Paper “Reviewing the Skilled Migration and 400 Series Visa Programmes,” September 2014**

### **Background information**

The Australian Psychological Society (APS) is the peak industry body and leading organization for psychologists in Australia, representing over 21,000 members. The APS is the largest of all non-medical health professional organisations in Australia.

The APS is the national assessing authority for overseas qualifications in psychology for the purpose of migration, employment and entry to Australian tertiary study. For the purposes of migration under the General Skilled Migration (GSM) categories, there are two pathways for an overseas-trained psychologist to gain a positive skills assessment. An applicant must either:

- a) have had their academic qualifications assessed by the APS as being comparable to six years of study in psychology completed in Australia; or
- b) obtain full (i.e. general), current and unconditional registration as a psychologist with the Australian Health Practitioners Regulation Agency (AHPRA).

Since the introduction of the assessment of skilled employment history, applicants can seek an assessment of their work experience via the APS, to obtain additional points to support their migration application.

The APS has been assessing psychology applications for the above purposes since the early 1990s, and in 1997 was appointed by the Commonwealth Government as the assessing authority for applications under the General Skilled Migration categories for psychology. It is the role of the APS to determine comparability of an applicant's qualifications in psychology to the Australian Psychology Accreditation Council (APAC) sequence of study in psychology completed in Australia.

Since 1 January 2010, the APS completed over 650 assessments of overseas qualifications in psychology for the purpose of migration. Approximately 70% of applicants are found suitable for migration, and this percentage has been essentially stable, despite an annual increase in the number of assessments. In 2013, the APS assessed qualifications from 58 countries.

***Comment on Key Visa Components and whether they could be simplified, what needs are not met or whether to incorporate them into a new skilled migration visa programme:***

### **Age Threshold**

For psychology, the age threshold of 50 is not appropriate and would run counter to the principles of functionality and effectiveness of this review. An age limit of 50 years of age is likely to restrict the pool of potential psychologists with strong qualifications and extensive experience for migration. Psychologists often continue working well beyond the age of 50 years.

---

APS membership data show that 6,933 (or approximately 30% of members who are registered psychologists) are above age 50. Of these, 2,333 were in the 50-54 age range, 1454 in the 55-60 range, and 3,146 above age 60.

The APS data are consistent with the statistics provided by the Psychology Board of Australia (PsyBA), which shows that 34.4% of registered psychologists are above age 50. 18.5% of registered psychologists were in the 50-59 year age group, 8.1% were aged 60 to 64, 5.3% 65 to 69, and 2.5% were in the 70 to 80+ age range. <http://www.psychologyboard.gov.au/About/Statistics.aspx>

**Recommendation:** The APS recommends retaining an age threshold requirement in the 457 programme but consider a cut-off age of 55 or 60 years and provision of special considerations for outstanding psychologists who may be above this age.

## English Language Proficiency

This standard is applicable to psychology and is an important standard for assuring clear communication in psychological service delivery.

The APS agrees with the Psychology Board of Australia (PsyBA) English Language Skills Registration Standard which requires psychologists who are seeking registration to provide evidence of English language proficiency, specifically a minimum score of 7 in all 4 components of the IELTS academic module.

There is an issue of efficiency, communication and duplication in the English language proficiency requirement for migrant psychologists. For example, in order to receive a positive skill assessment the APS requires applicants to provide evidence of the academic module of IELTS with a minimum of 7 in all four components. However, the Department of Immigration and Border Protection has varying requirements that include IELTS but also alternatives such as the OET. This is confusing for applicants, and especially for those applicants who commence the visa process before requesting a skills assessment and complete and pay for two separate tests.

**Recommendation:** The APS recommends retention of English language proficiency requirement for psychology and to provide clear direction to applicants what the language requirements are for psychology.

## Skills and Industry Standards

The current industry standards for psychologists include different pathways to meet the requirements for **general registration** as a psychologist:

- An applicant may receive a positive skill assessment if his or her academic qualifications alone meet the requirements for general registration.
- However, **an alternate pathway** exists by which students may complete a qualification comparable to a psychology sequence in Australia or overseas

---

followed by a period of supervised practice. The period of supervised practice is a maximum of two years following (full-time equivalent) which the individual meets the industry standard of general registration as a psychologist and is also eligible for a positive skill assessment. Feedback from applicants suggests there are limited visa options available while undertaking this alternative pathway.

With regards to the assessment of **skilled employment history**, the APS may assess work completed within Australia following general registration being obtained.

**Recommendation:** That the current industry standards for skilled migration in psychology be retained.

Initial skills assessment is completed by the APS. Depending on the outcome, a further assessment of work experience (and/or qualifications) may be done by the PsyBA/AHPRA. This process introduces a disconnect and inefficiencies for two principal reasons: 1. The PsyBA/AHPRA assess qualifications according to “substantial equivalence” whereas the APS assesses “comparability” of qualifications as directed by the Department of Immigration and Border Protection. 2. The “transitional programme” requirements (see below).

**Aspects that could be simplified:** The PsyBA has introduced a period of supervision for overseas trained psychologists (referred to as “the transitional programme”) during which time the psychologist is provisionally registered. Therefore, while the psychologist has already proven that he/she meets the skill and industry standards for psychologists, the APS is unable to consider this period of work as part of the assessment of skilled employment history, because the psychologist’s level of registration does not reflect the industry standard (i.e. does not hold general registration as a psychologist). This also causes problems for psychologists when seeking employment, as employers want “work ready” generally registered psychologists, not provisionally registered psychologists who require supervision.

This situation is creating serious concerns for many overseas-trained psychologists who have had their qualifications assessed by the APS as being suitable for migration but cannot gain general registration because of the transitional programme requirements. The difficulty for such psychologists is that they:

- cannot apply for positions commensurate with their qualifications and experience because they are provisionally registered and these roles require general registration;
- cannot complete their transitional programme because they cannot obtain employment;
- cannot obtain full registration until they complete the transitional program;
- cannot find employers because they are not considered work ready and therefore require supervision of their work.

The APS has received feedback from prospective employers who are no longer willing to employ such psychologists because they require “work ready” fully

---

registered psychologists, not provisionally registered psychologists who require supervision.

**Recommendation:** That psychologists assessed as suitable for migration be granted general registration with conditions whilst completing the transitional programme.

**Needs not being currently met:** From the APS's experience as a member-based organisation we have received feedback from members and the public seeking psychologists who can offer services in a language other than English, frequently for "community" or "in demand" languages not well resourced by existing services. It is not clear if there is a list of languages currently "in demand" in Australia and whether this is included in the points testing process.

**Recommendation:**

The APS recommends that advanced competence in a community or "in demand" language be clearly included in the points allocated for skilled migration assessments.

## Skills assessment

The current options for receiving a positive skills assessment are:

- A.** being assessed as holding comparable academic credentials to the industry standard (a six year sequence of study in psychology completed in Australia); or
- B.** holding full (general) registration as a psychologist in Australia.

The alternative pathway (**B**) aims to take into consideration study sequences that are structured differently to Australia (often because a country's tertiary structure is quite different to that of Australia). Following the introduction of the "transitional programme" by the Psychology Board of Australia, overseas trained psychologists are facing increasing difficulties obtaining registration, thus a positive skill assessment via the alternative pathway is not a viable alternative.

**Recommendation:**

- That the two options for a positive skills assessment be retained, since not all psychologists who migrate to Australia want to work as registered psychologists
- That the Department of Immigration work with the national assessment authority and the regulator to move forward on the issue using "comparability" as the basis for decisions about migration.

## Occupation Lists

The APS has made annual submissions on the Skilled Occupational List (SOL). These lists are important as they specify relevant occupations within psychology. SOL and the Consolidated Sponsored Occupational List (CSOL) classify the following occupations in relation to psychology:

- *Clinical Psychologist* (ANSCO code: 272311)

- 
- *Educational Psychologist* (ANSCO code: 272312)
  - *Organisational Psychologist* (ANSCO code: 272313)
  - *Psychologist nec* (not elsewhere classified) (ANSCO code: 272399)

Only the three categories of Clinical, Organisational and Educational Psychologist are listed as categories of advanced expertise beyond the standard 'psychologist' category. However, there are 9 areas of practice, both recognised as separate areas of expertise by the APS' nine Colleges and by the PsyBA's nine areas of practice endorsement. Currently missing from the ANSCO list are: Clinical Neuropsychologist, Community Psychologist, Counselling Psychologist, Forensic Psychologist, Health Psychologist, Organisational Psychologist, Sport and Exercise Psychologist.

This variance between SOL and the nine recognized areas of practice, highlighted repeatedly to the Department of Immigration and Border Protection, has introduced inefficiency to the assessment process.

***Recommendation:***

- That occupation lists be retained as a key migration component
- That there be ANSCO codes for all 9 areas of practice in psychology to increase processing efficiency

## **Points test**

In a multicultural society with a diverse and ageing population, migrants' language skills in community or "high demand" languages are highly relevant to psychological practice and can increase migrant employability. The points test could acknowledge the need for diverse linguistic competence by points being given for key language competence that may result in positive employment outcomes.

***Recommendation:*** That the points test be retained as a key visa component, and bonus points also be given for those able to provide professional services in "in demand" languages.

## **SkillSelect**

The introduction of SkillSelect and the criteria for assessing based on SkillSelect have contributed to significant improvement in the effective processing of migration applications.

***Recommendation:*** That SkillSelect be retained as a key visa component that facilitates efficient processing of migration applications.

---

## **Sponsorship and Nominations**

The APS agrees that employer/government sponsorship and nominations provide advantages for both the prospective employer and the migrant. The process has been further streamlined with the introduction of SkillSelect. A challenge to sponsorship and nominations is the current requirement of the transitional programme to full registration by the PsyBA, because by requiring new migrants to be provisionally registered, they cannot be classified as “work ready”. This is a disincentive for employers who are eager to employ migrants via the sponsorship and nominations pathways but find themselves faced with barriers to full registration of their nominees.

### ***Recommendation:***

- That sponsorship and nominations be retained as an efficient key visa component.
- That the Department of Immigration and Border Protection liaise with the profession’s regulator such that psychologists with migration applications based on sponsorship and nomination be granted general registration whilst completing the transitional programme.

## **VISA CATEGORIES**

### **Short-term migration categories**

The APS agrees that a flexible and responsive short-term visa framework would benefit especially those qualified migrants interested in a shorter stay in Australia and who may not want to work as registered psychologists. For example, in the higher education and research sectors, this would allow scientists and scholars to spend time in Australia. Of the three categories suggested (work, activity, and international relations), work and activity are most relevant to the field of psychology. For example, a university professor on study leave, paid by the home institution, could qualify for the activity visa. Increased flexibility in visa options for study would be desirable. For psychology, occupational training (especially practical placements) require provisional registration with AHPRA, and the possible requirements (e.g., English language proficiency and skill/experience/educational requirements) would need to assure that requirements for registration could be met as well. The APS, as the national assessment authority for psychology, has the relevant knowledge and experience to process such applications in a timely manner. The key visa components outlined for this category are appropriate.

### **Skilled work categories**

The APS notes the above discussion on (a) the disconnect between definitions of “comparability” and “equivalence” of qualifications and (b) the transitional programme, both of which affect the immediate employability of a migrant, and have the potential to be a barrier for the proposed temporary/provisional pathway.

---

## Conclusion

The APS is pleased to have been given the opportunity to participate in this review aimed at examining the applicability, functionality, effectiveness and alternative approaches in the skilled migration and 400 series visa programmes.

1. Overall, the existing skilled migration visa programme is meeting the skilled migration needs for psychology.
2. Aspects that could be simplified include addressing the disconnect between national assessment authorities and regulators, with respect to definitions of comparability and equivalence of qualifications. Whilst the APS fully agrees with the regulator's focus on protection of the public, at present, this disconnect affects employment outcomes for migrants, makes the process inefficient and costly for employers and migrants, and prevents highly qualified overseas migrants from meeting workforce shortage needs.
3. Current visa components to be incorporated in a new skilled migration scheme are English language proficiency, skills and industry standards, skills assessments, occupation lists, points test, SkillSelect, sponsorship and nomination and short-term migration categories. The APS is in favour of a more flexible and simplified scheme.
4. The APS supports integrity in the assessment process and, as the national assessment authority with over 20 years' experience, is well placed to complete assessments for skilled migration, including meeting registration requirements.

Specific **recommendations** are:

### 1. Age Threshold

The APS recommends retaining an age threshold requirement in the 457 programme but consider a cut-off age of 55 or 60 years and provision special considerations for outstanding psychologists who may be above this age.

### 2. English Language Proficiency

The APS recommends retention of English language proficiency requirement for psychology and to provide clear direction to applicants what the language requirements are for psychology.

In addition, the APS recommends that advanced competence in a community or "in demand" language be clearly included in the points allocated for skilled migration assessments.

### 3. Skills and Industry

- That the current industry standards for skilled migration in psychology be retained.
- That psychologists assessed as suitable for migration be granted general registration with conditions whilst completing the transitional programme.
- That advanced competence in a community or "in demand" language be clearly included in the points allocated for skilled migration assessments.



---

#### **4. Skills Assessments**

- That the two options for a positive skills assessment be retained, since not all psychologists who migrate to Australia want to work as registered psychologists
- That the Department of Immigration work with the national assessment authority and the regulator to move forward on the issue using “comparability” as the basis for decisions about migration.

#### **5. Occupation lists**

- That occupation lists be retained as a key migration component
- That there be ANSCO codes for all 9 areas of practice in psychology to increase processing efficiency

#### **6. Points tests**

That the points test be retained as a key visa component.

#### **7. SkillSelect**

That SkillSelect be retained as a key visa component that facilitates efficient processing of migration applications.

#### **8. Sponsorship and nominations**

- That sponsorship and nominations be retained as an efficient key visa component.
- That the Department of Immigration and Border Protection liaise with the profession’s regulator such that psychologists with migration applications based on sponsorship and nomination be granted general registration with conditions whilst completing the transitional programme.

#### **9. Visa Categories:**

The APS has no specific recommendations regarding the proposed three broad visa categories at this time.