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A member of the

Australian Council of Professions

29<sup>th</sup> September 2009

Ms Miranda Lauman  
Director, MODL Review  
Department of Immigration and Citizenship  
P.O. Box 25  
BELCONNEN ACT 2616

Dear Ms Lauman

Please find enclosed the submission by the Australian Computer Society to the review of the Migration Occupations in Demand List, Issues Paper Number One.

Should you have any questions, please do not hesitate to call me on (02) 9299 3666.

Yours sincerely

A handwritten signature in black ink that reads "Stuart Burrell".

**Mr. Stuart (Sam) Burrell**  
**Chief Executive Officer**

*ICT Professionals Shaping Our Future*



## **ACS SUBMISSION TO THE REVIEW OF THE MIGRATION OCCUPATIONS IN DEMAND LIST**

The ACS is the Australian representative body for Information & Communications Technology (ICT) professionals, attracting a large and active membership from all levels of the ICT industry. As a member of the Australian Council of Professions, the ACS is the public voice of the ICT profession and the guardian of professional ethics and standards in the ICT industry, with a commitment to the wider community to ensure the beneficial use of ICT, and to support and develop the local ICT sector.

The ACS provides skills assessment on behalf of the Department of Immigration and Citizenship for permanent visa applicants for the ICT sector, a role we have undertaken since 1993. The ACS skills assessment process has recently been subject to review and benchmarking at an international level by the International Federation of Information Processing, the international umbrella organisation for ICT societies.

The ACS also provides the Professional Year Program for overseas ICT graduates seeking permanent residency in Australia, on behalf of the Government.

The ACS is actively involved, as part of the Department of Immigration and Citizenship's consultation process, in the process for developing the MODL list for ICT occupations.

### **ISSUES FOR CONSULTATION**

The ACS has put forward the following input on the specific issues listed for consultation in the Issues Paper.

#### **Do you Support the Need for a New MODL?**

The ACS supports revision of the MODL for the ICT sector.

The MODL for applicants with ICT qualifications and experience has in the past, been a mixture of occupations, qualifications and/or experience with, often, specific vendor/proprietary software and programs.

This has created a short term, and perhaps misleading, view of "skills" and worker shortages within the ICT sector.

Job roles, occupations and use of specific programs and packages within the ICT sector are quite dynamic and as technology advances, so to do requirements for specific jobs and

occupations. Requirements can change quite rapidly and indeed, new job titles and occupations are regularly appearing in association with this technological change.

The result is that industry tends to focus on needing professionals that have experience in the latest, popular vendor program or software package, rather than focusing on the underlying skills that are needed for ICT professionals and others to undertake the specific occupations or use the specific vendor software. Skills are transferable: specific experience with a particular program may not be.

This has meant that MODL lists for the ICT sector date very quickly, with phases or popularity in using particular vendor software. **Importantly though, the underlying skills needed to use specific software or professionally undertake the duties of particular occupations or roles do not change as rapidly.** Provided the ICT professional has the appropriate skills, their skills are transferable across occupations and across particular vendor software programs.

Conversely, ICT workers chosen because of expertise in a particular vendor program cannot necessarily easily transfer that expertise to use in other areas or with other vendor programs (without specific prior training) if they do not have the underlying skills and qualifications.

The ACS believes that it would be sensible to review the MODL so that it is based on skills and qualifications, rather than on proficiency or experience in a particular occupation or role, or use of specific vendor software programs.

Basing the MODL on skills that are considered to be in shortage would increase its longevity, ensure that people coming into Australia on permanent residency have the skills necessary for a long and rewarding career in ICT, rather than simply having very specific and narrow experience that is likely to be quickly outdated.

It will also focus Government and organisations to take a more long-term view of their workforce needs and require them to plan accordingly.

As part of its professional development and professional certification program, the ACS uses the Skills Framework for the Information Age (SFIA) which can be mapped to occupations, such as those listed under the ANZSCO classification, to provide a skills framework that will allow assessment of the level of skills and qualifications needed to successfully undertake a particular role.

The SFIA is internationally recognised, and the ACS is working with the International Federation for Information Processing to increase international recognition and use of the SFIA framework. Countries using, or moving towards SFIA, are Australia, the United Kingdom, Japan, Korea, Singapore, New Zealand and India.

Using an international standard skills framework will increase transparency of the MODL for people looking to migrate to Australia from signatory countries.

The ACS is currently in discussion with AGIMO and the Australian Public Service Commission to implement the SFIA skills and professional development program for ICT professionals working for the Federal Government, as part of the implementation of the recommendations of the Gershon Review.

The ACS is also in the process of mapping SFIA for use in skills assessment for permanent visa applications from ICT professionals wishing to migrate to Australia.

### **Do you support the proposed MODL principles?**

#### **1. The MODL targets skills of high economic value to Australia.**

The ACS supports this principle, taking into account the comments from the previous section. As discussed, the ICT MODL does not list skills, rather it lists occupations and vendor qualifications that are in demand. Changing MODL to a list of skills that are considered in shortage and are of high economic value to Australia is strongly supported by the ACS.

ICT underpins all sections of our economy and is largely responsible for productivity enhancements occurring across the economy. As a result, ICT occupations are a high value add and have a significant multiplier effect in terms of the benefit they bring to the economy.

#### **2. The MODL compliments domestic skills supply and maximises skill use.**

The ACS supports this principle and believes that skilled migration represents an important source of labour and skills for the Australian ICT sector, and it should be available wherever particular skill sets cannot be readily sourced from within the Australian labour market.

To this end, it is important that the MODL represent those skills which are considered to be in true shortage. The skills considered in short supply can then be provided to higher education and VET providers so that they can adjust their courses accordingly to provide the skills that are in demand by industry.

#### **3. The MODL is prospective.**

The ACS supports this principle, although recognises the difficulty in developing a prospective skills list.

To help with this process, the ACS believes that all employers should be encouraged to include rolling three to five year skills assessment and foresighting as part of their annual reporting process. This information can be collected by the government and used in immigration and education planning processes.

It would be appropriate for Government agencies to lead the way on skills foresighting, particularly given its impending adoption of the SFIA skills and

professional development framework and the skills shortages being experienced by Canberra based Federal Government agencies.

Developing a MODL list that is prospective will also have benefits in terms of point 2, complementing the domestic skills supply.

**4. The MODL should not be driven by short term employment cycles.**

The ACS supports this principle on the basis of creating a MODL based on ICT skills, rather than occupations, for migration of ICT professionals to Australia. A skills based MODL should help industry to consider its needs on a longer term basis.

**5. The MODL needs to take account of other migration arrangements.**

The ACS supports this principle. Long stay temporary 457 visas and other temporary visas, represent a significant source of skills for the Australian ICT labour market. However, 457 visa applicants do not have to undertake skills verification and so their contribution to ICT professional skilled labour pool is unclear. Without this data, it is difficult to see the full picture of the nature of skills shortages that are occurring within the ICT sector and the role that temporary visas are playing in addressing those shortages.

The ACS policy on 457 visas is based on the following principles for sourcing/searching for ICT skills:

- cross training or up-skilling of existing staff;
- sourcing of skills available within the domestic market; and
- use of 457 visas to source appropriately skilled labour from overseas where those skills are not readily available domestically.

In deciding which of the above options to take, the ACS believes employers should consider the time and cost needed for up-skilling or cross training their current staff in comparison to sourcing applicants from overseas.

The ACS advocates skills verification for 457 visa applicants so that their contribution to the Australian ICT professional skills pool can be determined.

**6. The MODL is evidence based and underpinned by a robust and transparent methodology.**

The ACS supports this principle and believes that a MODL based on an assessment of the skills considered in shortage within the local ICT labour market should be based upon the ANZSCO codes and use the Skills Framework for the Information Age (SFIA) for determining appropriate skills for particular roles/occupations.

**Are there any additional principles for a new MODL that you would propose?**

The ACS has no input under this issue.

**Do you have any preliminary views on how a new MODL might be given effect?**

In terms of the MODL focusing on skills rather than occupations or vendor qualifications, the ACS believes that the MODL should be based on an internationally accepted skills framework, such as SFIA, mapped to standard occupational titles and descriptions used by the ANZSCO classification system. Three to five year rolling skills foresighting programs undertaken as part of the annual reporting process by government and industry would help provided up to date data for a skills based MODL.