

16 February 2024

Skills Passport Team
Department of Education
Department of Employment and Workplace Relations

To Whom It May Concern

Submission to National Skills Passport Consultation Paper

Multicultural Youth Advocacy Network Australia (MYAN) welcomes the opportunity to provide a submission in response to the *National Skills Passport Consultation Paper*. MYAN's submission will consider the issues raised in relation to 'Key Principle 1: Value and Use' of the consultation paper from the perspective of young people from migrant and refugee backgrounds and potential employers of this cohort.

It is difficult to anticipate the potential value of the National Skills Passport to this cohort without further detail about possible models, features and functions the passport may have; and evidence about how these possible models would address specific challenges and barriers in the employment market. Accordingly, the focus of this submission is to identify high level issues relevant to the development of the business case for the passport including:

- **Whether the passport appropriately aligns and integrates with the government's commitments to migration system reform** including commitments to enhance skills assessment for migrant employment potential and facilitate pathways for international students to access higher-skilled roles.
- **Whether the passport will build in easy trusted recognition of a broader range of overseas qualifications and work experience** (an essential feature if it is to be part of the solution required to address what the government has identified as failings in the current system of skills recognition by skilled migration assessment authorities).
- **Potential risks of unexpected adverse outcomes** that the passport exclude some young people from migrant and refugee backgrounds.

About MYAN

MYAN is the national peak body representing the rights and interests of young people aged 12-24 from refugee and migrant backgrounds (almost half of Australia's youth population.¹) Our vision is that all young people from refugee and migrant backgrounds are supported, valued and thriving in Australia.

¹ Australian Bureau of Statistics (2016) <https://www.abs.gov.au>

MYAN works in partnership with young people, government, and non-government agencies across the youth, settlement and multicultural sectors at the state and territory and national levels to ensure the particular needs of young people from refugee and migrant backgrounds are recognised in policy and service delivery.

MYAN provides expert policy advice to government, delivers sector development activities, and supports the development of young people's leadership and advocacy skills so they can have their voices heard at the regional, state, and national levels.

MYAN responses to question 1 in Key principle 1: How would you describe the value of a National Skills Passport

Young people from migrant and refugee backgrounds are a valuable resource for employers and businesses across Australia with strengths in international and cross-cultural knowledge, multilingual skills, high adaptability and resilience, as well as their individual qualifications and work experience.

Despite these considerable strengths, too many young people from migrant and refugee backgrounds in Australia (around 20% from non-English speaking households aged 15 to 29) are not engaged in education, employment, or training.² The Australian Labour Force Survey has consistently shown a disparity in the youth employment participation rate between young people born overseas and those born in Australia. Over the last 20 years, the gap between these two groups has been as large as 17%.³ By one estimate, closing this gap could boost the economy by \$44 billion and create 54,000 jobs.⁴

If the National Skills Passport builds in easy trusted recognition of a broader range of overseas qualifications and work experience it is likely to be of some value in helping to close this gap. However, without these specific design elements and further evidence, it is unclear what value the creation of the digital platform in and of itself would contribute to addressing the following significant employment challenges faced by this cohort:

- **Racism and discrimination** including in relation to looking for employment and job selection process.
- **Lack of 'foundational' skills and social capital** including the local work experience necessary to find employment in Australia and the social capital/ networks to help them 'get ahead'.⁵

² Deloitte Access Economics (2021) Covid-19 and young migrants – Impacts and solutions at <https://myan.org.au/wp-content/uploads/2021/08/DAEMYAN-COVID-impacts-FINAL-report-9.8.21.pdf>

³ Ibid.

⁴ Ibid.

⁵ Ethnic Communities' Council of Victoria (2014). Qualified but not recognised. ECCV: Melbourne

- **Employer reluctance to hire young people on visas:** Employers who often unaware about different working visas/work entitlements are can be unwilling to hire young people on any type of visas
- **Non-recognition of qualifications:** Young people who seek to work under skills migration are significantly hampered by the failure to recognise their qualifications and experience.

Recognition of international qualifications and skills

In relation to this last issue in particular, in its recent Migration Review, the government has recognised that “skills recognition is important but is poorly achieved in the current system” with the “skills recognition system contribut[ing] to skills mismatch and migrants not reaching their potential in the labour market.”⁶

In MYAN’s experience many young people from migrant and refugee backgrounds, especially recent arrivals, face significant challenges in having their overseas-acquired skills recognised in Australia because the assessment process used by assessment authorities takes too long and is too complex and costly. A key issue is the failure to recognise some international qualifications. It is also impossible in some situations for applicants to comply with the onerous requirements to provide documents from overseas institutions. For example, MYAN is aware of a number of recent Afghan evacuees who were not able to successfully contact the universities they recently attended in Afghanistan to obtain their transcripts and therefore could not even start the process of assessment and had to repeat their studies in Australia. Additionally, certain assessment authorities overlook relevant international work experience. These issues create poor outcomes both for young people from migrant and refugee backgrounds and for potential employers. The high costs, both financially and in terms of time, of unsuccessful or withdrawn applications further exacerbate hardship and inequity including through:

- ‘occupational downgrading’ where people are under-employed because their skills and qualifications are not recognised or used; and/or
- the need to repeat studies or gain additional work experience in Australia.

The government’s primary response to its identification of the need to improve the efficiency, accessibility, affordability and fairness of assessment authority processes at this stage is its discussion paper on Draft Best Practice Principles and Standards for Skilled Migration Assessing Authorities.⁷ As we stated in our submission in response to this discussion paper, MYAN considers it unlikely that the best practice principles and standards will be sufficient on their own to address the issues identified because they do not incentivise assessment authorities to correct failures and improve efficiency and fairness.

⁶ Australian Government (2023) *Review of the Migration System: Final Report 2023* at 157-162 at <https://www.homeaffairs.gov.au/reports-and-pubs/files/review-migration-system-final-report.pdf>

⁷ Australian Government, Department of Employment and Workplace (2023) *Draft Best Practice Principles and Standards for Skilled Migration Assessing Authorities* at <https://consultations.dewr.gov.au/best-practice-principles-and-standards-for-skilled-migration-assessing-authorities>

It is possible that the National Skills Passport could be a part of a broader solution to this issue *if* skilled and other migrants' skills are included in the passport and the currently complex process for recognising overseas qualifications is simplified. To this end, MYAN notes that there are a number of international examples of National Skills Passports (including in Sri Lanka and Bahrain) that are particularly targeted to assessing and sharing relevant skills and qualifications for migrant workers.⁸

In MYAN's view, building these elements into the National Skills Passport will be essential in order for it to align and integrate with the Government's proposed action to reform the migration system including the following actions (as noted in the Employment White Paper) to:

- "realise migrants employment potential [including by] improving skills assessment" and
- "improve employment outcomes for international students [by improving] pathways to work in higher skilled roles".⁹

Risk of unintended adverse outcomes

An additional risk relevant to the potential value of the national skills passport is that it may not benefit (or even be used) by those most in need of support.

In a European context for example, this risk is evidenced in an evaluation of an earlier iteration of the comparable Europass operating in the European Union. Research showed that, in 2013 at least, most Europass tools did not fully reach large groups of potential users, with Europass users tending to be "young, female and highly educated". The report concluded that groups that would most benefit from assistance, such as low-skilled unemployed people, often lack the necessary skills to complete the Europass documents and/or find them too complex or confusing.¹⁰

Looking to an Australian context, likely foreseeable barriers to usage of the National Skills Passport by some young people from migrant and refugee backgrounds include:

- **Gaps in digital access**, including both physical access to the necessary technology and the skills to use it. Research suggests that newly arrived migrants, refugees, and asylum seekers have less digital access compared to other young Australians (including culturally and linguistically diverse

⁸ Skills Passport Sri Lanka at <https://employers.lk/skills-passport/#:~:text=The%20passport%20allows%20both%20the,%2Dskilling%20and%20up%2Dskilling>. Accessed 13/02/2024. Das, O (2022) *Formalising Skills, Encouraging Mobility: A Case Study of Sri Lanka's Skills Passport and Bahrain's New Work Permit* at https://www.icwa.in/show_content.php?lang=1&level=1&ls_id=8794&lid=5749 MYAN notes that the Sri Lankan National Skills Passport is an initiative specifically for returnee migrant workers.

⁹ Australian Government Treasury (2023) *Working Future: The Australian Government's White Paper on Jobs and Opportunities* at p245 at <https://treasury.gov.au/employment-whitepaper/final-report>

¹⁰ Report from the Commission to the European Parliament and the Council (2013) *Evaluation of the Europass initiative Second evaluation of the Decision of the European Parliament and the Council on a single Community framework for the transparency of qualifications and competences (Europass)* at <https://eur-lex.europa.eu/legal-content/EN/TXT/PDF/?uri=CELEX:52013DC0899>

young people in established migrant communities).¹¹ While all newly arrived young people had access to digital technologies, variations existed in digital skills, primarily due to differences in education with lower levels of education correlated with less access.

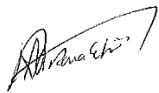
- **Lack of familiarity with the Australian system including employment services, options and pathways:** This can include a lack of awareness of the application process including selection criteria and resumes with evidence suggesting that young people from refugee and migrant backgrounds feel unsupported in getting job ready.¹²
- **High cognitive load** (including because of the need to navigate Australian services and systems for themselves and often also for the family and community) **leading to lower capacity to overcome frictions in unknown systems.**
- **Language barriers** making it hard to understand and fulfil requirements, particularly without support.

We welcome the government's key principle 2 for the National Skills Passport, that it be user-centred, but note that however well designed the National Skills Passport may be it is likely to be able to overcome these barriers, without additional tailored support being provided.

To conclude, MYAN welcomes the government's intent in considering the value of a National Skills Passport and strongly supports the government's broader objective in its Employment White Paper. However, on the basis of the information currently available, we are not able to quantify the potential value to young people from migrant and refugee backgrounds of a National Skills Passport in light of the significant barriers to employment this cohort experiences, and have instead identified foreseeable risks with the proposal.

MYAN would be pleased to provide further information on any part of this submission to assist.

Yours faithfully,



Rana Ebrahimi

National Manager

MYAN

¹¹ Centre for Multicultural Youth (2018) *Culturally and Linguistically Diverse Young People and Digital Citizenship* at <https://www.cmy.net.au/resource/culturally-and-linguistically-diverse-young-people-and-digital-citizenship/>

¹² MYAN COVID-19 Policy Platform May 2020