

**Submission by the Australian Nursing and Midwifery Federation**

# **Discussion Paper – Planning Australia’s 2024–25 permanent Migration Program**

**Submission to the Department of Home Affairs**

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**Australian  
Nursing &  
Midwifery  
Federation**



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## Introduction

1. The Australian Nursing and Midwifery Federation (ANMF) is Australia's largest national union and professional nursing and midwifery organisation. In collaboration with the ANMF's eight state and territory branches, we represent the professional, industrial and political interests of more than 322,000 nurses, midwives and care-workers across the country.
2. Our members work in the public and private health, aged care and disability sectors across a wide variety of urban, rural and remote locations. We work with them to improve their ability to deliver safe and best practice care in each and every one of these settings, fulfil their professional goals and achieve a healthy work/life balance.
3. Our strong and growing membership and integrated role as both a trade union and professional organisation provides us with a complete understanding of all aspects of the nursing and midwifery professions and see us uniquely placed to defend and advance our members' interests.
4. Through our work with members, we aim to strengthen the contribution of nursing and midwifery to improving Australia's health and aged care systems, and the health of our national and global communities.
5. We welcome the opportunity to provide feedback to the Department of Home Affairs 'Planning Australia's 2024-25 Permanent Migration Program' consultation. We acknowledge that many of the issues and recommendations outlined in this submission reflect those made by the ANMF to previous years' consultations on permanent migration planning.
6. The focus of this submission is on the need to ensure we have enough people with the right skills and training to provide safe, quality care to meet the needs of an ageing population and increasing pressures on Australia's health and care systems. Through robust workforce planning and development Australia can better plan and integrate its migration programs.
7. It is critical that policy settings address domestic workforce supply and development. The Government must design and support greater opportunities for nurse and carer education and training, pathways into employment for new graduates, career progression, appropriately valued remuneration, secure employment and decent working conditions.
8. These long-standing attraction and retention issues across the health and care sectors must be addressed in concert with migration planning, to ensure that both temporary and permanent migration are based on genuine labour market testing and shortages.
9. Where labour and skills shortages persist the ANMF advocates for migration that is targeted to addresses genuine need ascertained through rigorous labour market testing. Our



migration programs must provide clear and accessible pathways to permanency and ensure meaningful social and economic participation for migrants working and living in Australia.

10. The ANMF supports medium to longer term migration planning as this will allow for better integration with shared or state and territory run initiatives, including infrastructure, housing and education. We also believe that long-term planning will ensure Australia can better meet its international obligations to support our neighbours and global partners as they are increasingly affected by issues including climate change and conflict displacement. The ANMF would like to see an increase in permanent humanitarian visas from a diverse mix of countries.
11. The ANMF acknowledges the work underway to develop a new Migration Strategy, encompassing the recommendations of the comprehensive Migration Review. While we understand the new Strategy will focus on temporary migration, this system must not be unwedded from permanent migration planning. This is particularly important given the increasing emphasis on temporary migration as a primary workforce supply mechanism to ongoing health and care workforce shortages. Australia must ensure it is not filling long-term shortages with temporary migration solutions.

## Labour Market Testing and Workforce Development

12. The ANMF is concerned that the skew towards temporary migration, in conjunction with the permanent migration cap, is inhibiting the ability to grow the size of the permanent migration program and to do so based on labour market evidence. The ANMF therefore supports the reform direction recommended by the Migration Review to plan based on Net Overseas Migration, accounting for both temporary and permanent residents, rather than relying on rigid permanent caps alone.<sup>1</sup>
13. The ongoing shortages in health and care professions are widely reported. In the most recent Skills Priority List (SPL), 'shortages for Health Professionals were far-reaching, with all Registered Nurse occupations and Midwives found to be in shortage [and these] skill shortages being acute, especially compared to other professional occupations.'<sup>2</sup> Overall shortages in the Community and Personal Service Workers occupations, which includes Enrolled Nurses, Aged or Disabled Carers and Personal Care Assistants, are 'considerable' and for 2023, Nursing Support Workers fell into shortage.<sup>3</sup>
14. Multiple occupations represented by the ANMF have been in shortage from 2021 to 2023, placing them on the 'persistent shortage' list.<sup>4</sup> These are:
  - Midwife
  - Enrolled Nurse
  - Aged or Disabled Carer

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<sup>1</sup> 'Review of the Migration System: Final Report 2023', p. 8.

<sup>2</sup> Jobs and Skills Australia, 2023 Skills Priority List, Key Findings Report, September 2023, p. 10.

<sup>3</sup> Ibid, p. 13.

<sup>4</sup> Ibid, Appendix D, pp. 38-43.



- Personal Care Assistant

15. The recent SPL data highlights two key issues: that policy settings are not having the desired effect on attraction, retention and development of the domestic nursing and care workforce and need to be adjusted accordingly and, there is a continuing need for migrant workers in these occupations and therefore better integration of migration into long-term workforce planning. To avoid migrant workers being stuck in 'permanently temporary'<sup>5</sup> visa cycles and Australia being beholden to temporary fixes to persistent issues, an increase in the pathways to permanency for migrant health and care workers is necessary.

### Domestic Workforce Development

16. In addressing the first issue of domestic workforce attraction and retention, the ANMF commends the Government's efforts to boost investment in workforce planning and development. We acknowledge the multifaceted approach being taken, including legislative amendments to the industrial framework that will improve job security (for example, the *Fair Work Legislation Amendment (Secure Jobs Better Pay) Act 2022*), the commitment to fund aged care wage increases determined in the Aged Care Work Value case, and the establishment of Jobs and Skills Australia as a robust skills authority.
17. Together, these reforms should recentre workforce development as a key priority for Australian Government, industry and workers. These measures will only be successful if their implementation is ongoing, regularly assessed for effectiveness and coordinated across Departments and Ministerial portfolios. The ANMF also emphasises that the full effect of these measures requires sustained funding support from the Government to augment their impact on labour shortages.
18. Additionally, with the effects of the pandemic continuing to deter people from entering or remaining in the health and care sectors, workforce development must encompass more support for nursing and care students and graduates. This includes nationally consistent transition to practice programs, funded student placements to allow students to be paid while completing essential workplace-based training and ensure adequate peer support programs to assist nursing and care staff to remain in or re-enter the workforce.

### Rebalancing to Permanent Migration

19. On the second issue of ensuring that there is a rebalancing from temporary to permanent migration, the ANMF acknowledges work already underway via the increasing pathways to permanency in temporary programs such as the Aged Care Industry Labour Agreement (**ACILA**) and the aged care stream in the Pacific Australia Labour Mobility (**PALM**). The ANMF is pleased by these legislative and policy changes to embed permanency into such programs and grow the size of the permanent migrant cohort.

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<sup>5</sup> Department of Home Affairs, 'A Migration System for a More Prosperous and Secure Australia', Outline of the Government's Migration Strategy, April 2023, p. 2.



20. However, the success of these changes is dependent on rigorous labour market testing domestically and internationally to ensure migration continues to meet genuine needs and considers the global shortage of nurses, midwives and carers.
21. The ANMF is also concerned by the ethical issues associated with high income countries such as Australia targeting workers from lower income countries, such as those in the Pacific, for low-wage and 'unskilled' work. The ANMF is concerned that workforce and social impact analyses are not comprehensively undertaken by the relevant Departments prior to recruiting from these countries.
22. The aged care stream of the PALM scheme provides a live example. There is little information made available to stakeholders as to what labour market testing is undertaken in sending countries. The ANMF has expressed concerns to the relevant Departments, the Department of Foreign Affairs and Trade and the Department of Employment and Workplace Relations that the scheme is relying on gendered stereotypes and assumptions to draw primarily from young, female Pacific Islander and Timor-Leste workers<sup>6</sup>.
23. Recent data on gender segregation in the nursing and care occupations demonstrates that many migrant aged care workers hold nursing qualifications that are unrecognised in Australia.<sup>7</sup> Additionally, care in the Pacific and Timor-Leste is not commonly organised in formal residential care, meaning that the program has the dual adverse impact of draining from the health care systems of these countries and simultaneously disrupting household and community care structures.
24. While work is being done to help PALM workers maintain familial connections while in Australia, via the Family Accompaniment pilot, this policy change does not address or alleviate the issues created within sending countries. All temporary visas must provide a clear, accessible, affordable, and self-nominated option to obtain permanent residency for the worker and any accompanying family. Migrant workers in aged care dedicated visa pathways i.e. the PALM and ACILA, must also have streamlined access to qualification recognition (discussed further below at 26 and 28). These workers and their families must also have priority access to the permanent program.

## Size and composition of the permanent migration program

25. As policy settings continue to be adjusted to address the structural barriers to workforce supply in Australia, the size and composition of the permanent migration program will be able to grow. The ANMF believes that this will create opportunities to expand the humanitarian visa program, improve the experience for internationally qualified nurses and midwives, and complement domestic and international initiatives to achieve gender equality

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<sup>6</sup> Pacific Australia Labour Mobility, Aged Care Evaluation Finding Reports, <https://www.palmscheme.gov.au/research>

<sup>7</sup> Cortis, N, Naidoo, Y, Wong, M & Bradbury, B 2023, 'Gender-based Occupational Segregation: A National Data Profile', Report, p. 31.



in health and care professions traditionally performed by young, low-paid and insecurely employed female workers.

26. While we appreciate the humanitarian migration program is separate from other programs, there are important intersections between the programs. Increasing humanitarian places in our migration system will ensure Australia meets its international obligations. The ANMF strongly supports the Skilled Refugee Labour Agreement Pilot Program and its recent expansion. We recommend that work be undertaken to ensure more health professionals can access visas and work in their related field under the pilot, including undertaking additional study or testing to have international nursing qualifications recognised.
27. Providing refugees and forcibly displaced persons with meaningful work will assist with settlement and maximise the economic and social participation of our new citizens. This is particularly important as global conflicts and crises drive an increase in the number of displaced persons.<sup>8</sup> Planning of the humanitarian program must be interlocked with how Government and industry address skills and labour shortages, via migration programs or otherwise.
28. The ANMF is concerned by the growing cohort of migrant nurses and care workers working at a skill and wage level that is not commensurate with their international qualification.<sup>9</sup> There are known barriers to internationally qualified nurses having their skills recognised in Australia, including high costs and lengthy delays. This demonstrates a significant missed opportunity, given that a common thread among health professionals in shortage, including all Registered Nurses, is 'that they require high levels of skill, qualification, and experience'.<sup>10</sup>
29. The outcomes of not utilising the full skills and qualifications of migrant nurses and carers are entrenched wage exploitation and gender inequality for already vulnerable migrant workers, who are also likely to be young and female.<sup>11</sup> This places downward pressures on broader efforts to address gender segregation and inequality in care work while also risking deterring temporary migrants from electing to join permanency pathways, for example in the PALM scheme where Certificate level qualifications are the focus in migrant recruitment.

## Longer-term planning in the permanent migration program

30. The ANMF supports a move to medium to long-term planning for permanent migration. Longer-term planning will assist in integrating all streams of migration with broader workforce planning and development efforts. This is particularly important for industries and occupations experiencing persistent shortages where additional investment in attraction and retention measures are needed.

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<sup>8</sup> 'Review of the Migration System: Final Report 2023', p. 26.

<sup>9</sup> 'Markets, migration & the work of care in Australia', Fact Sheet 1, Australian Research Council project, 2018.

<sup>10</sup> Ibid.

<sup>11</sup> Jobs and Skills Australia, 2023 Skills Priority List, Key Findings Report, September 2023, p. 11.



31. Medium to long-term planning will also enable the Commonwealth to work closely across all levels of government i.e. with the states and territories. With increasing pressures on social and economic infrastructure, namely housing, health care and education, it is critical that policy is developed cohesively between the jurisdictions and with a long-term view. Greater involvement of jurisdictions would encourage decision-makers to keep migration front of mind when planning future infrastructure, health care and education.
  
32. Industry and businesses have an important role to play in rebalancing the system in favour of permanent migration, addressing migrant worker exploitation, and implementing domestic skills development strategies. Longer-term planning presents an opportunity to compel industry and businesses to comprehensively plan their skills and labour needs and to engage other workforce attraction and retention levers, rather than over-relying on temporary, low-paid migration.

## Concluding Remark

33. The ANMF takes this opportunity to highlight the immense complexities and inefficiencies that plague Australia's migration system. These issues are inextricably linked to one another and to broader workforce attraction and retention barriers. The need to undertake a whole-of-system, integrated approach to reform across programs and policy settings cannot be stressed enough.