

22 December 2023

Mr Paul Denman

Assistant Secretary, Immigration Policy and Planning | Immigration Policy Group

Department of Home Affairs

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Dear Mr Denman,

RE: Australia's 2024–25 permanent Migration Program consultation

The Aged and Community Care Providers Association (ACCPA) appreciates the opportunity to provide feedback to inform the Australia's 2024–25 permanent Migration Program. It also includes reference to key opportunities from the *Migration Strategy for Australia* released during the consultation period on 11 December 2023.

This submission has been prepared from an aged care perspective, to highlight migration policy settings that could better support a critical sector in need attract and retain a sufficient migration workforce to meet mandatory staffing requirements, particularly in residential aged care.

Planning and designing an effective and targeted migration system for aged care

Migration needs to consider the needs of the care sector and, specifically, aged care. The aged care sector's reliance on migration as a workforce solution is well-known. Migrant workers are a key characteristic of the aged care sector with around 30 per cent of the workforce comprised of migrants.¹

According to CEDA, Australia will need a net increase of around 170,000 workers, or an additional 17,000 direct care workers on average each year from 2020 to 2030. (This projection is based on meeting a three star rating in aged care which is considered acceptable by Government).²

We welcomed the initiative of the Pacific Labour Mobility (PALM) Scheme and its application to the aged care sector, but note this scheme alone cannot address workforce supply needs in Australia due to the scale required to meet future demand for workers. ACCPA also welcomed the introduction of the Aged Care Industry Labour Agreement (ACILA) in May 2023, however note members report varying experiences with the Memorandum of Understanding (MOU) requirement.

A significant and pressing gap in the current migration system is the lack of a targeted solution for increasing our supply of registered nurses. This comes at a time when legislation has mandated the increased use of registered nurses in aged care, during a known shortage of in Australia's aged care sector³ - compounded by global competition for skilled labour in the health sector.

¹ Committee for Economic Development of Australia (CEDA), [Duty of care: Meeting the aged care workforce challenge Report](#), 2021, p.27

² Committee for Economic Development of Australia (CEDA), [Duty of care: Meeting the aged care workforce challenge Report](#), 2021, p.17

³ Department of Health and Aged Care, [24/7 Registered Nurse responsibility](#) webpage; [Care minutes](#) webpage and [Senate Committee: Community Affairs Budget Estimates 2022-2023 \[Hot Issues Brief\]](#), Document 15 of FOI 4178 p.1-3

On 11 December 2023, the Minister for Home Affairs, the Hon Clare O’Neil MP, announced a new Migration Strategy for Australia with wide-ranging reforms, many of which will influence the attraction and retention of migrant workers in aged care.

We support the Government’s recent announcement for the intention to take a long-range, multi-year view to better manage the migration intake⁴, but seek consideration of a carve out or that a specific quantum of places are held for sectors in critical need, such as the aged care sector.

R1: Set a specific and sufficient quantum of places for sectors in critical need, such as the aged care sector, in the 2024-25 permanent migration planning levels and forward years; or ensure policy settings that result in an equivalent outcome (including with reference to the intersection of State-based migration powers).

A key focus for ACCPA in 2024 will be monitoring and engagement on the new ‘Skills in Demand’ which will have targeted pathways – the Core Skills Pathway (RNs, Allied Health), and the Essential Skills Pathway (ACILA and PALM Scheme). We also note the emphasis on the Aged Care Industry Labour Agreements (ACILA), and look forward to working in a tripartite way to iron out the existing challenges informed by the experiences and insights of members with this initiative to date.

R2: Ensure any policy design involving the new ‘Skills in Demand’ targeted pathways, particularly for the Core Skills and Essential Skills as well as the evolution of the Aged Care Industry Labour Agreements (including the Memorandum of Understanding (MOU) requirement), is undertaken in consultation with the aged care sector, including aged care providers.

R3: That the work of the Australian Government’s Care and Support Economy Taskforce and the Aged Care Taskforce consider the role and contribution of migration to addressing the workforce crisis in aged care, and that any recommendations for related policy frameworks, as well as any future financial or legislative arrangements for the aged care sector, do not create barriers for aged care providers to readily access migrant workers through Australia’s migration system.

Prioritise settings and ‘wrap-around’ supports for aged care workers in community settings

Migration for care cannot simply be about health care, and placement of healthcare workers in hospitals. It must consider the needs of the community settings, including aged care.

Policy considerations such as sponsoring by employers, portability of the visa, wages and regulatory compliance will benefit from a coordinated approach across Government between the immigration and aged care functions, as well as informed by broad sector consultation.

R4: Ensuring that visa portability is paired with fees that can be paid monthly, so that the current employer pays if an aged care worker decides to move workplaces.

Our members share the objective of successfully settling and sustaining migrant workers in Australia in a way that is worker-centred and welcome the development of Government initiatives to assist them provide dedicated and tailored support.

Supporting migrant workers with wraparound supports such as housing, is an essential part of their ability to attract and retain a migrant workforce who will want to remain with them for the long-term.

⁴ Department of Home Affairs, [Migration Strategy](#), December 2023, p.77-83.

R5: Ensure there is government support through funding, policy and bilateral opportunities for ‘wrap-around’ services for aged care workers across Australia to address employees’ other needs, including availability of accommodation, schooling for children, and transport. A possible model may be the Family Accompaniment Pilot within the PALM Scheme.

R6: Reduce the cost of education for worker’s children (currently between \$6,300 and \$7,500 in 2024), such as through a Federally funded relocation grant or via a National Cabinet agreement.

R7: Assist newly arrived workers, particularly those providing home care services, to promptly apply for a driver’s license.

Housing of aged care workers, including in the regions

Housing is a critical component of effective migration, particularly for regional, rural, and remote areas and related strategies must be aligned to migration needs. Members report this is a dependency for them and many are looking at land or existing stock such as independent living units as possible options but lack the capital margins to build or upgrade.

R8: Identify options for housing support for migrant workers. Options may include infrastructure grants for on-site accommodation; and Federal-State partnerships to bring about local solutions in regional areas.

Improving policy settings that will sustain aged care in regional Australia

Regional, rural and remote Australia is particularly vulnerable to workforce supply shortages in aged care and the intersection of Federal and State migration levers and points systems are critical to future opportunities for migrant workers to settle in these locations.

R9: Ensure that the design of the migration system avoids unintended system disincentives for migrants to move to localities in need of workforce supply (such as the interrelationship of the migration points system across states and territories and operation of Designated Area Migration Agreements, or other levers).

Collectively, our recommendations will result in a more stable environment for Australia’s aged care residents and care recipients, increased confidence in the care they will receive, assurance for the migrant worker in their future opportunities and confidence for the provider that they will be able to deliver the care needed, when its needed.

If you have any questions or would like to discuss this submission, please contact Anne Liddell, Head of Policy at anne.liddell@accpa.asn.au.

Yours sincerely,

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Aged & Community Care Providers Association