

Tuesday, 31 October 2023

Assessing Authority Policy and Assurance  
Migrant Skills Assessments Branch  
Department of Employment and Workplace Relations  
Australian Government

## Lodged online

Dear Assessing Authority Policy and Assurance Team

### Submission on Best Practice Principles and Standards for Skilled Migration Assessing Authorities

Chartered Accountants Australia and New Zealand (CA ANZ), CPA Australia and the Institute of Public Accountants (IPA) (the accounting bodies) make this joint submission in response to question 8 of the consultation on best practice principles and standards for skilled migration assessing authorities (the consultation). The accounting bodies will make their own submissions on the other consultation questions.

#### Question 8 “Should there be more than one assessing authority appointed to assess an occupation. Why? Why not?”

The accounting bodies support continuation of the three assessing authorities model for accounting. The reasons are:

- Having more than one assessing authority for accounting provides applicants with a greater choice of assessment pathways and professional membership.
- The combined resources of the three accounting bodies are necessary to meet the demand for assessments in a timely way. Accounting is one of the most in demand occupations for skills assessment. Having more than one assessing authority is the best way to meet such demand while also providing a user-friendly and migrant-centric approach to skills assessment.
- It provides applicants the choice of going to an assessing authority that is best placed to understand their skills, experience and areas of professional interest. The range of possible roles in accountancy is extremely broad. Each of the three accounting bodies has developed expertise in different areas of the profession (which is reflected in their respective membership composition).
- The combined quality assurance and expertise of each of the three accounting assessing authorities, and their joint focus on continuous improvement, provides a strong base for a resilient migration system for the broad range of accounting roles.

#### How are the accounting assessing authorities ensuring consistency?

We understand the Department of Employment and Workplace Relations (DEWR) would like to ensure there is a baseline of consistency for accreditation/ assessment standards between accounting assessing authorities. We agree as this is in the public interest, and the interest of applicants and employers.

The three bodies invest considerable time and effort to ensure there is a consistent and transparent approach to assessing accounting qualifications. This is primarily achieved through fortnightly meetings of representatives from CA ANZ, CPA Australia and IPA. At the meetings, we discuss assessment issues, trends in applications and emerging risks, and share learnings. The objective is to ensure assessments are handled with consistency and integrity concerns are identified and responded to quickly (this can include

reporting such issues to DEWR). If DEWR has any requirements in terms of how we might report on these meetings to them, please let us know.

### **What are the disadvantages of a single assessing authority for accounting?**

- A single assessing authority for accounting is not viable given the workload and resources required to complete the large volume of applications received in a timely manner.
- It would be beyond the current capacity of any one of the accounting bodies, or another assessing authority, to take on the sole responsibility for assessing all skilled migration assessments for accounting in a timely way, ensuring best practice principles and standards are met.
- The assessing authorities for accounting already face challenges resourcing unexpected surges in demand. This can result in a significant strain on our staff and cause long delays in processing.

### **Issues to consider should DEWR decide to move to a single assessing authority for accounting**

If DEWR decides to move to a single assessing authority for accounting, the authority should:

- Be appropriately resourced.
- Obtain input and agreement from CA ANZ, CPA Australia and IPA on the accreditation/ assessment standards for accounting. This is to ensure they are aligned to the membership requirements of each body, meet domestic employment needs and satisfy applicable regulatory requirements.
- Maintain regular, ongoing dialogue with CA ANZ, CPA Australia and IPA on application numbers, outcomes and any proposed changes to policy, providing notice in advance.
- Provide each applicant with information on the membership benefits offered by each of the three accounting bodies so they can choose their preferred professional membership.

### **Other matters**

CA ANZ, CPA Australia and IPA request that DEWR and the Department of Home Affairs provide early notification to us of any changes that may impact application volumes, timelines or policy. This would give us more time to prepare for the changes and enable us to meet Principle 1 of the draft standards – provide a user-friendly and migrant-centric experience.

If you require further information or would like to discuss the views shared in this submission, please contact:

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- Regine Zou, General Manager Education and Assessments at IPA on 03 8665 3149 or [regine.zou@publicaccountants.org.au](mailto:regine.zou@publicaccountants.org.au)

Sincerely,

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