Skilled Migration Occupation Lists—Submission Guidelines

1. Role of Submissions in Updates to the Lists

The Department of Jobs and Small Business (the Department) is responsible for providing advice to the Australian Government on the regular updates to the Skilled Migration Occupation Lists (SMOL). This advice is underpinned by a published methodology, labour market data and analysis, and a stakeholder consultation process.

The stakeholder consultation process includes submissions from stakeholders to supplement the Department's labour market data and analysis. The submission process aims to capture information on the types of skills employers need to meet their skilled workforce needs, including how employers are planning to manage their future skilled workforce needs.

Submissions are one of the many factors taken into account for the SMOL update process. It is important to note that no single factor will determine an occupation's status on the lists. Occupations are identified for change when there is significant evidence for this across a number of different factors.

The Department is open to receiving all types of available supporting evidence from stakeholders. However, for those stakeholders seeking information on how to provide a 'best practice' submission, this paper provides guidelines on the types of evidence that the Department finds most useful. Stakeholders may wish to use part or all of these guidelines to help shape their input to the Department during the consultation periods.

2. What we are looking for

What we want to know from stakeholder submissions is something we might not understand purely from looking at national labour market data. This kind of information could go to:

- Regional variations in the need for particular occupations.
- Additional evidence on 'niche' or highly specialised skills within occupation categories.
- A specific need for highly experienced workers within a particular occupation category, for example workers within 10 years' experience.
- The experience and remuneration levels of highly skilled staff where there may be gaps in the local labour market

However, this is just a list of suggestions. You are in the best position to help us understand the labour needs for the industry you work in. If you feel there is something important we need to know about an occupation when we undertake our labour market analysis, tell us.

2.1. Tips for making a good submission

- Focus on information the Department does not already have.
  - A list of data the Department already includes in its analysis is on page two of its [methodology paper](#).
- Give us the context.
  - If you are providing us with a survey or other data or evidence, tell us a little bit about it. How did you collect it, is it representative, what do you think it shows and why is that relevant. All these things help us better understand what you was us to know.
- Do it once, do it well.
  - A single, well targeted and evidence based submission is more valuable than 100 submissions providing the same evidence.
- Keep it short.
  - Focus on the critical issues from your perspective. This will help communicate your message to us most effectively.

The following sections set out in more detail some of the key features we find valuable in a submission. However, the above principles capture the main things to focus on.

3. Key Features of an Evidence Based Submission

A best practice evidence based submission may include the following:

- Data collection and analysis

  - The data referred to in a submission can be collected from a survey, administrative records or another verifiable and robust source. Data should be occupation specific, timely (preferably referring to the most recent 6 to 12-month period), accurate, and supportive of the arguments that the submitters are making in the submission.

  - Information can be collected and analysed in different ways. This process does not need to be complex to be meaningful.

  - Data need not be numeric; qualitative data can also provide valuable insights.

  - Data should be fit for purpose. This means the data are appropriate to be applied in the context of your submission. given the methodology and limitations of the data.

- If possible, it is useful to provide a well-defined link to a six-digit ANZSCO occupation(s).

4. Key Data Requirements—Survey and Non-Survey Data

4.1. Survey Data

- Submitters may provide an outline of the how the survey was conducted, including when the survey was taken, how many people or businesses were surveyed, the percentage of people who responded and how people or businesses were chosen to be surveyed (e.g. simple random sample).

- It is also useful to include a discussion surrounding how well the sample used for the survey represents all people in the specific 6-digit ANZSCO occupation or businesses who employ people in that occupation. This discussion may include an estimate of the proportion of the occupation in scope for your survey and (for industry bodies) the proportion of your organisation's membership which was surveyed.

4.2. Other Data

- It is helpful to provide an outline of the type of information used to support the position in the submission (data from the Australian Bureau of Statistics, VOCSTATS, job vacancy data, administrative data, focus groups, social media, etc.) and why this information is relevant.

- This may include a discussion of how well the data used for the survey represents all people in the specific 6-digit ANZSCO occupation or businesses who employ people in that occupation.

- Any focus groups should be genuinely representative of the parties with an interest in the domestic supply and demand of skilled workers in the occupation(s) in scope of the submission. The discussions should be mediated in an unbiased manner. An attachment specifying the scope of focus groups, participants, and associated findings should be provided to the Department. Please note that using information collected in focus groups may be difficult for the Department to verify.

4.3. Reanalysis of Data Used in the SMOL Methodology

Submissions using the same data sources as used in SMOL methodology, particularly those created by the Department (e.g. employment projections, Job Outlook data, the internet vacancy index and skill shortage research), are not necessary to provide as they are part of our labour market methodology.

A list of all datasets used in the SMOL methodology is publicly available in the SMOL proposed methodology paper published on the Department's website.[1]

5. Using Published and Other Surveys and Reports—How to Determine Relevance

When using information from published reports, surveys or other research, please include a discussion on how the information referenced is relevant to the concerns expressed in your submission.

We recommend using information which specifically references the 6-digit ANZSCO occupation(s) in scope of the submission.

Other considerations should include:

- How well does the information reflect the conditions in the sector in which the business is based or in which you are employed?

- How does the information relate to the domestic Australian labour market?

- Is the information current (i.e. does it pertain to the last 6 to 12 months)?

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[1] https://docs.jobs.gov.au/documents/skilled-migration-occupation-lists-proposed-methodology

6. Information on Survey Design Materials

For those seeking further information on survey design, data collection methods, questionnaire design, sample design, analysis and presentation of results, and other statistical resources; these are publicly available from the National Statistical Service website.[2] Useful links are provided in the Technical Appendix.

7. Definitions

7.1. Occupation

The preferred standard for employment and labour market data is the 6 digit Australia New Zealand Standard Classification of Occupations (ANZSCO) code.

If an occupation does not exist in the current ANZSCO, the submission may nominate which existing occupation the new occupation should be coded to and include reasons for its classification as such.

7.2. Skill shortage

Skill shortages exist when employers are unable to fill or have considerable difficulty filling vacancies for an occupation, at current levels of remuneration, conditions of employment and in reasonably accessible locations. It is important to note that skill shortage research applies to qualified and experienced workers. The methodology takes into account an employer's desire for employability skills and other intangibles that experience brings in addition to a formal qualification.

The Department's definitions of shortage and recruitment difficulty are found in its *Skill Shortage Research Methodology* paper[3] on its website.

Skilled Migration Occupation Lists— Submission Guidelines: Technical Appendix

Public submissions are part of the stakeholder consultation process for updates to the Skilled Migration Occupation Lists (SMOL)[4]. This Technical Appendix supplements the guidelines published by the Department of Jobs and Small Business (the Department) to assist organisations to make submissions which would assist the Department to provide advice on the skilled migration occupation lists.

The Department recognises that the type of information available to individuals and businesses would be different to that which may be available to peak bodies, employer groups, and other organisations.

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[2] www.nss.gov.au/nss/home.NSF/pages/Statistical+References
[3] https://docs.jobs.gov.au/documents/skill-shortage-research-methodology-0
[4] Skilled Migration Occupation Lists (SMOL) includes Short Term Skill Shortage List (STSOL), Medium Long Term Strategic Skills List (MLTSSL) and the Regional Migration Occupations List (RMOL).

These guidelines are based on the seven pillars of the Australian Bureau of Statistics (ABS) data quality framework[5], adjusted for the submission process and the characteristics of the organisation type making the submission. The seven pillars of the ABS data quality framework are:

1. Institutional Environment
2. Relevance
3. Timeliness
4. Accuracy
5. Coherence
6. Interpretability
7. Accessibility

Submissions from organisations and individuals should take these pillars into consideration when preparing their submissions. The following information may assist organisations and individuals to interpret the seven pillars of the data quality framework as applied to their submissions.

1. Institutional Environment

Institutional environment refers to factors which may have a significant influence on the credibility of the organisation or agency producing the data.

The Department notes that peak bodies and employer groups operate to promote the interests of their members and industries they represent. Peak bodies and employer groups are also in a unique position to provide insights on their industries that may be missed by more detached observers.

Submissions from individuals and business owners based on their own experiences are also relevant to the submission process. However, an individual's experience is usually indicative of their own business practices, and may not be representative of an industry or sector as a whole.

Efforts should be made to gather, collate, and report on data in an objective and impartial manner and communicate this information to the Department

2. Relevance

Care should be taken to make sure that any submissions and supporting documents directly address the question of visa holders working in the industry or occupation in question, and how the addition or removal of a particular occupation may impact the Australian labour market. Making sure any data provided addresses these concerns directly will make submissions more valuable in assisting the Department in making decisions on the SMOL.

3. Timeliness

Given that the labour market is never static, data used in support of submissions should ideally be contemporaneous with the submission period. Care should be taken that any data provided are not so

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[5] Australian Bureau of Statistics, 2009, *ABS Data Quality Framework, May 2009*, ABS cat. no. 1520.0, www.abs.gov.au/ausstats/abs@.nsf/mf/1520.0

old as to be of limited use in assessing the state of the Australian labour market as it exists when the submissions are being taken.

Data collected in the six months prior to the submission will be more relevant to the decision making process. Data that are more than six months old will be considered as background information.

Labour market projections or modelling which are referenced to the Australian and New Zealand Standard Classification of Occupations (6-digit level) and based on a published methodology will also be considered. These projections or modelling should also be contemporaneous.

4. Accuracy

Accuracy refers to the degree to which the data correctly describe the topic they were designed to measure. All care should be taken by submitters to ensure the accuracy of data provided. Submitters should endeavour to have processes in place to recognise and manage errors that may appear in data collection and processing, and articulate any known limitations to the quality and accuracy of data provided in submissions.

5. Coherence

Submitters should endeavour to ensure that data provided with their submission is internally coherent, and any comparisons of data over time are coherent. In this context, 'coherence' refers to ensuring as far as possible that data provided can be meaningfully compared across multiple items, and across time periods. This concept is similar to measuring like with like, or not comparing apples with oranges. For example, if data items are the same across two time periods (say, employment), the underlying methodology for collection should be the same.

6. Interpretability

The concept of interpretability refers to the ability of the information to help provide insight into the data. Submitters should take care to ensure that data presented are easily interpretable by the Department, and material should be provided to assist the Department in making correct interpretations of data provided. See *Data Requirements* for information on what the Department considers aids interpretability.

8. Accessibility

Ideally, the Department would prefer any data presented in submissions to be publicly available to anyone wishing to use it. If data is not publicly available, submitters should articulate any elements of the data that may be publicly available, what costs may be associated with access to the data, and in what formats they are available.

9. Further Information

More detailed information on data quality, sample surveys, and statistical use and production are available from the following sources:

Australian Bureau of Statistics, 1999, *An introduction to sample surveys: a user's guide, 1999*, ABS cat. no. 1299.0, www.abs.gov.au/AUSSTATS/abs@.nsf/DetailsPage/1299.01999?OpenDocument

Australian Bureau of Statistics, 2009, *ABS Data Quality Framework, May 2009,* ABS cat. no. 1520.0, www.abs.gov.au/ausstats/abs@.nsf/mf/1520.0

Australian Bureau of Statistics, 2010, A guide for using statistics for evidence based policy, 2010, ABS cat. no. 1500.0, www.abs.gov.au/ausstats/abs@.nsf/mf/1500.0

National Statistical Service, *Sample size calculator*, www.nss.gov.au/nss/home.nsf/pages/Sample+size+calculator

National Statistical Service, *Statistical References*, www.nss.gov.au/nss/home.NSF/pages/Statistical+References

National Statistical Service, *Survey Design Materials: Basic Survey Design*, www.nss.gov.au/nss/home.NSF/pages/Survey%20Design%20Materials