

14 March 2019

Department of Education and Training

Sent by email: AQFReview@education.gov.au

Dear Review Panel

Australian Qualifications Framework Review

Global Mobility Immigration Lawyers welcomes this opportunity to comment on the Review of the *Australian Qualifications Framework discussion paper* as part of the overall review of the Australian Qualifications Framework (“AQF”).

Global Mobility Immigration Lawyers

[Global Mobility Immigration Lawyers & Migration Agents](#) is a firm of immigration lawyers and registered migration agents (aka immigration agents) in Melbourne. We are committed to giving our clients a voice in government processes, particularly any processes affecting immigration matters, whether directly or indirectly.

Overview

The AQF framework interacts in many ways with the Australian migration program, in particular skilled visas, student visas and to a lesser extent employer-sponsored visas such as the TSS, 186 and 187 subclasses.

Many skilled visa applicants rely on the recognition of international qualifications to meet the skill requirement for a visa subclass. Further, many independent skills assessing authorities such as VETASSESS rely on the AQF framework to make their assessments.

We have confined our comments to those sections of Part 4 of the submission that are of particular relevance to immigration and visas.

4.3 AQF taxonomies and levels

As a general rule we support simplification. From an immigration and visa perspective we are particularly supportive of any measures that have the effect of simplifying correlations with international qualifications.

4.4 Senior secondary school certificates

Global Mobility Immigration Lawyers & Migration Agents supports senior secondary school certificates being allocated an AQF level.

There has been an understandable push for students to have access to VET qualifications and vocational training in their final years of school, particularly for students who have indicated they do not wish to attend university.

From an immigration perspective, there are many highly skilled visa applicants who complete a 'diploma' level qualification as part of a vocational program while in secondary school, but their qualification may not be recognised as being a diploma in the AQF framework.

This decreases Australia's ability to compete for skills globally. It also creates disparity when it comes to applying for skills assessments and qualifying for skilled visa subclasses.

Giving this type of secondary schooling an AQF level will ensure the complexity of study is recognized, and bring it in line with international schooling.

Conclusion

Global Mobility Immigration Lawyers is supportive of any move to improve the opportunity for international qualifications to be recognized in Australia.

We thank the Review Panel for its consideration, and remain at its service in relation to this Review.

Yours faithfully

[sent electronically without signature]

Ariel Brott

Accredited Specialist Immigration Lawyer
& Registered Migration Agent

[Global Mobility Immigration Lawyers & Migration Agents](#), Melbourne

