



SUBMISSION: EMPLOYMENT WHITE PAPER

November 2022

The Refugee Council of Australia (RCOA) is the national peak body for people from refugee and asylum seeking backgrounds and the organisations and individuals who work with and support them. RCOA promotes the adoption of humane, lawful and constructive policies by governments and communities in Australia and internationally towards refugees, people seeking asylum and humanitarian entrants. RCOA consults regularly with its members, community leaders and people from refugee backgrounds, and this submission is informed by their views.

RCOA welcomes the opportunity to provide feedback on the Employment White Paper and supports the focus of these consultations on women's economic participation and equality and the need to create "more opportunities for more Australians". This submission focuses on the employment of people from refugee backgrounds, outlining their experiences of the Australian labour market as well as opportunities to realise the potential of this diverse population group who, given the chance, can contribute significantly to the objective of the Australian Government for "a bigger better-trained and more productive workforce".

Since the Council began its work in 1981, we have consistently seen and documented how refugees who come to Australia and seek protection, or who are resettled from a country of asylum, are strongly motivated to rebuild their lives in this country. They wish to work, to contribute to their local communities, to start their own businesses and to ensure their children prosper. **The assumption from the Australian Government should be that refugee and humanitarian entrants, like other Australians, want to work in ways that draw on their skills, experience and aspirations.** Public policy and services should be built on this assumption, helping to remove barriers and challenges that prevent full economic participation.

Our recommendations in this submission focus on: improving labour market outcomes for those who face challenges (5.2 in Terms of Reference), skills and training (5.3), migration settings (5.4), and the role of collaborative partnerships (6). We welcome an opportunity to discuss our recommendations further.

1. Employment experiences of refugee and humanitarian entrants

1.1. Refugees contribute to the Australian economy

Successive Australian Governments have made a tangible commitment to providing a lasting home to people fleeing conflict, violence and persecution through the Refugee and Humanitarian Program, with an average annual intake of 14,000 refugee and humanitarian entrants since 1977-78.¹ In 2022-23, the Program is planned to grant permanent visas to 17,875 refugees. The Albanese Government aspires to increase the size of the Humanitarian Program to 27,000 places a year, with an additional 5,000 places for community sponsored refugees.²

While the objective of the Humanitarian Program is to provide safety and a long-term solution to people in need of international protection, research has also shown the significant contribution that refugee and humanitarian entrants make to Australia's economy and society, including in the areas of jobs and skills.³ These contributions relate to:

¹ RCOA. [How many refugees have come to Australia?](#)

² ALP National Platform 2021. <https://alp.org.au/media/2594/2021-alp-national-platform-final-endorsed-platform.pdf>

³ Hugo (2011). [A Significant Contribution: The Economic, Social and Civic Contributions of First and Second Generation Humanitarian Entrants](#); Deloitte Access Economics (2019). [Economic and social impact of increasing Australia's humanitarian intake](#)

- **The younger demographic profile** and long-term engagement in the Australian labour market of refugee and humanitarian entrants (i.e. a median age 15 years younger than the national average and the lowest settler loss rate of any migrant group).⁴
- Many refugees arriving with **significant skills, qualifications and overseas work experience** relevant to the Australian labour market, including as medical professionals, tradespeople, engineers, business owners, educators and carers.⁵
- Refugee-humanitarian **labour force participation rates** converge toward that of the Australia-born population over time. The second generation performs at a higher level.⁶
- Refugee and humanitarian entrants engage **disproportionately in the labour force in some regional areas**, and in **industries where there are significant labour shortages**.⁷
- Refugee-humanitarian settlers show a **greater propensity to form their own business** than other migrants, and risk-taking, entrepreneurialism and an ability to identify and take advantage of opportunities is a key characteristic of the group.⁸
- Refugee and humanitarian entrants **facilitate the development of trade** between Australia and their countries of origin.⁹

1.2. Refugee and humanitarian entrants face barriers in securing employment

While there are clear long-term benefits of welcoming refugees to Australia, people who have been forcibly displaced face **a range of challenges that affect their ability to find work**. At a minimum, their careers are disrupted and they face the challenge of accessing an unfamiliar labour market in a foreign country. Many face other challenges, such as physical and mental health issues arising from their persecution. These compound other disadvantages faced by people from culturally and linguistically diverse backgrounds, such as the need to master English required for different jobs, racism and discrimination in employment, lack of Australian work experience or networks, and difficulty in having overseas qualifications recognised.

Barriers and challenges faced by refugee and humanitarian entrants seeking employment in Australia are well evidenced. These relate to:

- **Job-seeker characteristics:** English levels; the need to upskill or retrain, particularly for those who have had limited opportunities to work and access education prior to settlement; lack of Australian work experience and industry-related networks; health and trauma recovery; and understanding of and navigating the Australian labour market.
- **Labour market and other structural barriers:** Recognition of qualifications and prior experience; industry accreditation or licensing processes; accessibility of recruitment processes; racism and discrimination; access to transport and childcare; and ineffective employment services.
- **Immigration and visa status:** There are many people whose visa status presents significant challenges for accessing or sustaining employment, with employers hesitant to take on workers whose visa status is unclear or requires regular renewal. This includes:
 - 19,614 refugees on **temporary protection visas** (TPVs or SHEVs) that need to be periodically renewed.¹⁰
 - 107,177 people who applied for protection and are either waiting for an initial decision, have

⁴ The median age of migrants can differ substantially across different visa categories. Permanent Humanitarian visa entrants tended to be the youngest arrivals with a median age of 22.7 years. In contrast the overall Australian population was considerably older with a median age of 37.3 years. See ABS (2018). [Spotlight on overseas net migration](#); See also Commonwealth of Australia (2021). [2021 Intergenerational Report: Australia over the next 60 years](#)

⁵ Shelton (2022). [Census reveals migrants tend to be more highly educated. So why do they find it harder to land jobs?](#)

⁶ Hugo (2011). [A Significant Contribution: The Economic, Social and Civic Contributions of First and Second Generation Humanitarian Entrants](#)

⁷ AMES (2015). [Small Towns Big Returns: Economic and Social Impact of Karen Resettlement in Nhili](#)

⁸ Legrain & Burridge (2019). [Seven Steps to SUCCESS: Enabling refugee entrepreneurs to flourish](#); Radford et al. (2021). [Refugees Rejuvenating and Connecting Communities: An analysis of the social, cultural and economic contributions of Hazara humanitarian migrants in the Port Adelaide Enfield area of Adelaide, South Australia \(Summary Report\)](#).

⁹ Bahar, Parsons & Vézina (2022). [Refugees, trade and FDI](#)

¹⁰ As of October 2022, see: Department of Home Affairs, [UMA Legacy Caseload Statistics](#), p.5.

applications under review, or have received a final refusal.¹¹ A large number **do not have work rights** and all are on **bridging visas that require regular renewal**.

As a result of these challenges, **it can take time for refugee and humanitarian entrants to transition to work** as they learn English, strive to have their qualifications and skills recognised, train or retrain, build their social networks, and learn how to navigate the Australian labour market and services.

2. Improving labour market outcomes for refugees

2.1. Diverse experiences require diverse strategies

Refugee and humanitarian entrants are a **significantly diverse population group**. Many arrive with overseas qualifications and extensive prior work experience — they were business-owners, doctors, electricians, teachers, lawyers, managers and engineers. Others will have had limited opportunities to access training, education or work opportunities, or may have significant disruptions in their work histories due to experiences of persecution, conflict and displacement. What works in facilitating refugee transitions into an Australia employment context will vary significantly.

Dr Amin Niazai, forest ecology and climate change scientist

Dr Amin Niazai, a 35-year-old Afghan-born Melburnian, is a forest ecology and climate change scientist with a master's degree and a PhD from Kyoto University in Japan. He led climate change adaptation and natural resource management in Afghanistan and headed projects for international groups including the United Nations Food and Agricultural Organisation, the US Department of Agriculture and AusAid. He is fluent in four languages. But in Australia, Dr Niazai has struggled to find work in his field.

In Afghanistan, Dr Niazai's dream was to stop the degradation and desertification of Afghan forests and transform landscapes ravaged by years of drought to replenish food resources and livelihoods of local communities. But that dream was destroyed in October last year when the Taliban takeover forced him to flee to Australia. His family has settled well, the children have started school and they have made a lot of friends in the local community.

After seven months of searching for work, Dr Niazai is about to start a three-month internship with the Department of Environment, Land, Water and Planning. Dr Niazai said he was excited by this opportunity, but it was a big step down in his career. "It's kind of frustrating for a person like me when you were working in top management positions with many years of important research and work that has been published in one of the top-quality journals in the world," Dr Niazai said.

Source: ABC News. [Census reveals migrants tend to be more highly educated. So why do they find it harder to land jobs?](#)

2.2. What works to improve economic participation

There is substantial evidence of **approaches that work** in supporting refugee employment transitions and economic participation.¹² These include:

- Individual case management and referral services, particularly specialist services that have expertise in delivering both settlement and employment support.
- Mentoring programs with an employment focus.
- Information and training on Australian work culture and systems.
- Work experience programs.
- Industry-related training targeting migrant and refugee communities.
- Services providing career advice, planning and job search support.
- Social enterprise and initiatives supporting small business development.

¹¹ Statistics are from 31 July 2022. 95,364 are people seeking protection who arrived on a valid visa and 11,813 arrived in Australia by boat and sought asylum before December 2014 ('Legacy caseload'). See: Department of Home Affairs. [Monthly Update: Onshore Protection \(Subclass 866\) Visa Processing - July 2022](#) and [UMA Legacy Caseload: Report on Processing Status and Outcomes – July 2022](#)

¹² Refugee Council of Australia (2010). [What works: Employment strategies for refugee and humanitarian entrants](#)

- Services advocating and liaising directly with employers.
- Services providing support with skills and qualification recognition, including bridging courses that lead to industry-recognised qualifications or licencing.
- English language classes with an employment focus; and
- Post-employment follow-up and support.

2.3. Targeted investment in specialist refugee employment services

The findings of a government-funded review into integration, employment and settlement outcomes for refugees and humanitarian entrants in 2019 (The Shergold Review) recommended the value of refugee place-based employment trials in key areas of refugee settlement, in recognition of the importance of specialist, employment-focused and place-based supports for facilitating refugee employment transitions.¹³ To date, place-based and specialist refugee employment services have mainly been undertaken through **pilots and localised initiatives that are rarely sustained**.

Refugee Career Pathways Pilot (CPP)

The Career Pathways Pilot (CPP) was a three-year pilot employability program funded by the Department of Social Services which ran from 2017 to 2019. It aimed to facilitate employment transitions for skilled and qualified refugees within five years of their arrival in Australia. Rather than seeking to secure immediate employment for refugees, the pilot focussed on helping participants to find work that matched their professional or trade skills and qualifications. Service providers with expertise in refugee support and/or employment services were funded to deliver the CPP. Within the model, Career Pathway Advisors provided case work and career advice including: developing individualised career pathway plans; providing financial support targeted at skills recognition and industry accreditation; and providing assistance following employment outcomes.

AMES Australia's CPP program supported 361 refugees to use their qualifications in professions such as medicine, pharmacy, engineering and business/accounting. Two key elements of success for the CPP program were that it allowed Career Pathway Advisors to identify the participant's skills and build employability early in their settlement journey and to provide personalised engagement and emotional support. In surveys and focus groups undertaken by AMES, participants reported that they had increased their confidence, acquired a positive outlook, and developed strong social networks early in their settlement journey as a result of this support.

An AMES follow-up survey of the participating cohort conducted in June 2021 found that this personalised engagement had a lasting impact by enabling participants to build resilient employability and slowly accrue high-quality employment outcomes. Overall, the sampled participants had increased their employment rate through the COVID-19 pandemic, indicating many participants had found work in resilient occupations.

Source: Ette, H (2021). [Maximising refugee employability by building resilience: evidence from Australia](#)

There are a range of **targeted refugee employment support initiatives** that have been developed that provide compelling evidence of what works. For example, the Refugee Career Pathways Pilot¹⁴ that was terminated in 2019 demonstrated the importance of case work and career advice to assist skilled and qualified refugee arrivals navigate complex qualifications and skills recognition processes, industry accreditation/licencing, access industry-specific professional networks, and support socialisation into Australian workplace cultures. Embedding these learnings into longer-term programs is well overdue.

Even within the parameters of mainstream employment services, **investing in refugee specialists is imperative** to ensuring the employment challenges and barriers faced by refugee and humanitarian entrants are addressed in ways that draw on expertise and connections that refugee employment specialists have developed over many years. To date, there are only two refugee specialist employment services that have received funding through Workforce Australia to stand up

¹³ Shergold, Benson & Piper (2019). [Investing in Refugees, Investing in Australia: The findings of a Review into Integration, Employment and Settlement Outcomes for Refugees and Humanitarian Entrants in Australia](#)

¹⁴ Ette, H. (2021). [Maximising refugee employability by building resilience: Evidence from Australia](#)

services in three of the 24 regions, despite the existence of many organisations with considerable expertise and experience in delivering both settlement and employment services, including on the Workforce Australia Services national panel.¹⁵ Furthermore, there are key settlement locations in New South Wales (Liverpool, Bankstown), Queensland (Brisbane, Logan and Toowoomba) and Western Australia (Stirling) where neither CALD or refugee specialist services have coverage (see Table 1).

Table 1. Top 20 Local Government Areas (LGAs) with highest settlement of humanitarian arrivals with Workforce Australia CALD or refugee specialists

LGA	Humanitarian settlers ¹⁶	Workforce Australia region	CALD or Refugee specialist funded	Provider
Fairfield (C)	18,910	Sydney Greater West	CALD	AMES Australia
Hume (C)	12,019	North Western Melbourne	Refugee and CALD	AMES Australia
Liverpool (C)	8,102	Sydney South West	No	
Brisbane (C)	5,994	Somerset	No	
Casey (C)	5,598	South Eastern Melbourne and Peninsula	CALD	WISE Employment
Logan (C)	5,326	Brisbane South East	No	
Salisbury (C)	4,185	Adelaide North	CALD	Serendipity (WA)
Wyndham (C)	3,946	Western Melbourne	Refugee and CALD	Sarina Russo Job Access
Greater Dandenong (C)	3,848	South Eastern Melbourne and Peninsula	CALD	WISE Employment
Toowoomba (R)	3,354	Darling Downs	No	
Blacktown (C)	3,210	Sydney Greater West	CALD	AMES Australia
Melton (S)	3,086	Western Melbourne	Refugee and CALD	Sarina Russo Job Access
Brimbank (C)	2,624	Western Melbourne	Refugee and CALD	Sarina Russo Job Access
Playford (C)	2,539	Adelaide North	CALD	Serendipity (WA)
Whittlesea (C)	2,418	North Eastern Melbourne	Refugee and CALD	AMES Aus. (Refugee), Sarina Russo (CALD)
Parramatta (C)	2,382	Sydney Greater West	CALD	AMES Australia
Holroyd (C)	2,186	Sydney Greater West	CALD	AMES Australia
Stirling (C)	2,024	Perth North	No	
Bankstown (C)	1,823	Sydney South West	No	
Maroondah (C)	1,745	North Eastern Melbourne	Refugee and CALD	AMES Aus. (Refugee), Sarina Russo (CALD)

While funding for specialist employment providers is needed, concerns have been raised by refugee community members and settlement service providers over many years about **the incentive structure within employment services funding models** that can push new arrivals into jobs that do not correlate to meaningful career outcomes or economic participation. Jobseekers can be pressured to accept entry level or low-skill jobs because employment services have been funded simply on getting a person into work, not on the fit or sustainability of job outcomes. For example, if a jobseeker has significant overseas experience and qualifications in a trade or profession, there may be a disincentive for (for-profit) providers to support job seekers to pursue qualifications recognition and industry-specific accreditation processes that can be a lengthy, complex and more expensive process to navigate. It is timely, then, that Workforce Australia is being flagged for reform, with opportunities to ensure funded services are incentivised to help people not just into any job, but

¹⁵ Services on the national panel with expertise in both refugee support and employment services include: AMES Australia, Host International, Settlement Services International, The Salvation Army

¹⁶ Settlement Data for all humanitarian visa holders by LGA who arrived from 1 June 2012 to 31 December 2021 (Department of Social Services)

into employment that more closely aligns with their skills, qualifications, experience and aspirations.

Recommendation 1. *The Department of Employment and Workplace Relations:*

- (a) *considers sustained funding for refugee place-based employment programs in areas of high settlement that builds on the knowledge and experience of previous pilot initiatives;*
- (b) *ensures panel members with refugee specialist expertise are funded under Workforce Australia in all areas of high refugee settlement; and*
- (c) *actively considers how reform of the Workforce Australia funding model can incentivise support for meaningful career pathways within mainstream employment services.*

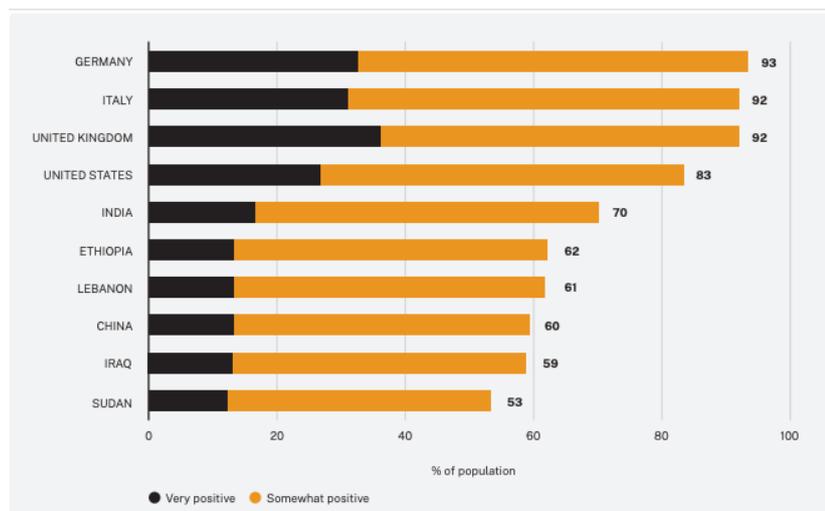
2.4. Tackling racism and discrimination in employment

There is a well-evidenced ‘refugee gap’ in labour market participation that cannot be explained by either skills, qualifications or English language differences, and has been **attributed in research to systemic factors including racism and discrimination**.¹⁷ The 2022 report from the Scanlon Foundation’s longitudinal study of social cohesion in Australia highlights significant and entrenched prejudice in the general population towards people from particular backgrounds, including from countries where many arrived as refugees, such as Iraq and Sudan (Figure 1). The Social Cohesion Survey 2022 also found negative attitudes towards people of Muslim faith in 29% of the 5,800 survey respondents.¹⁸ For refugee women who choose to cover their hair and are more visibly identifiable as Muslim, this is a particularly troubling finding with regards to employment prospects.

Prejudice clearly plays out in terms of how people are able to integrate into Australia society and, presumably, into employment. As the Scanlon Cohesion Survey found, “people who reported experiencing discrimination in the past 12 months based on their skin colour, ethnic group, or religion have social cohesion scores that are significantly lower than the national average” (p.71).

It is imperative then that the work currently underway by the Australian Human Rights Commission to develop a National Anti-Racism Framework is progressed and findings implemented, including where they relate to employment practices. While we acknowledge that the Albanese Government has made a commitment to this work¹⁹, tackling racism and discrimination requires **sustained commitment and resourcing to ensure anti-racism work is embedded in all areas of government policy and programming**, with a view to facilitating wider societal shifts.

Figure 1. Results of Scanlon Foundation Social Cohesion Survey 2022 question: ‘Would you say your feelings are positive or negative towards immigrants from....?’²⁰



¹⁷ Olliff et al. (2022). [“We will start building from that”: Social capital, social networks and African migrants’ job-seeking experiences in Australia](#); Colic-Peisker & Tilbury (2007). [Integration into the Australian Labour Market: The Experience of Three “Visibly Different” Groups of Recently Arrived Refugees](#); Hugo (2011). [A Significant Contribution: Economic, Social and Civic Contributions of First and Second Generation Humanitarian Entrants](#)

¹⁸ O’Donnell (2022). [Mapping Social Cohesion 2022](#), p.66.

¹⁹ Australian Human Rights Commission (2022). [Attorney-General commits Government to anti-racism strategy in Kep Enderby Memorial Lecture](#)

²⁰ O’Donnell (2022). [Mapping Social Cohesion 2022](#), p.67.

Recommendation 2. *That the Australian Government commits to long-term investment in anti-racism work as a cornerstone of ensuring better employment outcomes for more Australians and fully implements findings arising from the development of the National Anti-racism Framework.*

3. Skills, education and training, upskilling and reskilling

3.1. Refugees are failing to have overseas skills and qualifications recognised

There are countless examples of refugee and humanitarian entrants with skills and qualifications relevant to the Australian labour market who have been **unable to access, afford or successfully navigate skills and qualifications recognition or industry accreditation processes.** The process of overseas qualification recognition can be expensive, complex and difficult to navigate. While the Shergold Review reported that what matters to employers is that refugees can demonstrate what they can do, not just having a piece of paper that shows the certification that they have received overseas,²¹ there is still **an unwritten expectation and push to attain Australian qualifications** to get a foot in the door in many industries.

Recognition of prior learning and experience: Samuel

'Samuel' arrived on a permanent (Refugee) visa with his family through the Humanitarian Program. Prior to resettling in Australia, Samuel had worked for 27 years as an electrician in Ghana and Liberia. Seeking work as an electrician in Perth, Samuel was told he had to re-train and would need to undertake a full apprenticeship. Samuel decided not to pursue this path and utilise his skills because his family of nine would struggle to survive on an apprenticeship wage. Instead, Samuel accepted work as a cleaner.

Problems with overseas skills and qualification recognition processes are long-standing and there have been many attempts at reform or to pilot ways to make processes more accessible to migrants, including the recent Skills Assessment Pilot. While such initiatives have potential to reduce some of the barriers facing overseas qualified and skilled refugee entrants, they still involve a degree of complexity to apply for an assessment. Any future changes to unlocking overseas qualifications and skills recognition processes should ensure affordability and accessibility to refugee and humanitarian entrants, including those who may find difficulty accessing required documentation but who would be willing and able to demonstrate their skills and knowledge to prospective Australian employers. **Investing in specialist refugee employment supports (Recommendation 1) is an important complement to reform of overseas skills and qualification recognition processes.**

3.2. Industry licencing processes need greater government oversight

While there has been significant attention paid to qualifications and skills recognition processes, there has been less attention on industry licensing as a barrier to employment. That is, even if a person's overseas qualification or skills are formally recognised, many industries require a person be accredited by a specific industry body in order to practice their profession or trade in Australia. **Industry registration or accreditation processes ('licensing') can be extremely lengthy, expensive and difficult to navigate,** with requirements varying across different Federal, state and territory jurisdictions. In some cases, licensing effectively acts as employment gatekeeping and can be particularly problematic when there is only one pathway to meeting licensing requirements. These issues have been well documented by the Committee for Economic Development of Australia (CEDA) in its Skills Recognition report (2022), which highlights the variability, extent, stringency and costs associated with wide-spread occupational licensing in Australia.²²

Appendix 1 of this submission provides a more detailed case study of the dentistry industry, but similar issues are at play across a number of professional and trade fields, with medical professions

²¹ Shergold, Benson & Piper (2019). [Investing in Refugees, Investing in Australia: The findings of a Review into Integration, Employment and Settlement Outcomes for Refugees and Humanitarian Entrants in Australia](#), p. 42.

²² See CEDA (2022). [Skills Recognition](#)

and engineering oft cited.

Industry-controlled accreditation processes: Carmen

'Carmen' arrived on a permanent (Refugee) visa in 2018. Carmen obtained her general dentistry qualification from Damascus University, a top university in Syria, and worked professionally as a dentist in Saudi Arabia for over 20 years. In order to practice as a dentist in Australia, Carmen is required to have her original qualification assessed, pass written and practical dentistry exams administered by the Australian Dental Council, and pass an occupational English test.

Carmen enrolled in a (pilot) career pathways program shortly after arriving in Australia and was supported to prepare for the accreditation process for one year. In this time, she had her qualifications assessed and studied for and passed the written exam. Since then, Carmen has sat the 2-day practical exam on three occasions without success. As accreditation exams are expensive (at least \$10,000 to complete), infrequent (at least 18 months to complete all steps) and success rates low (only 27% of overseas-trained dentists who applied for accreditation through the Australian Dental Council passed the required examinations between 2018-2021), Carmen is not sure how to proceed and is frustrated after four years.

Despite extensive overseas work experience, qualifications, professional-level English and a strong motivation and willingness to work in a recognised skills shortage area, Carmen does not know if she will be able to work as a dentist in Australia. Carmen does not understand why peers who studied and worked alongside her in Syria and Saudi Arabia and then moved to Germany, Austria or France are all working as dentists within a year of arrival.

Carmen is currently working in a hardware store and is struggling to save enough money to re-engage with the accreditation process as well as support her family.

It is RCOA's view that **there is an important role for government to play in ensuring there is a level of oversight and accountability to industry licensing processes**. The Office of the Fairness Commissioner (Ontario) in Canada provides an example of how government can provide oversight of regulatory bodies and ensure all migrants and refugees have fair, transparent and equitable access to regulated professions and trades.

Mandate of the Office of the Fairness Commissioner (Ontario)

The Fairness Commissioner assesses the registration practices of certain regulated professions and trades to make sure they are transparent, objective, impartial and fair for anyone applying to practice his or her profession in Ontario. The functions of the Fairness Commissioner include:

- Assessing the regulated professions' and compulsory trades' registration process
- Initiating audits of registration processes
- Advising regulatory bodies about their registration process and other issues
- Setting guidelines for the regulatory bodies' reports to be provided to the Fairness Commissioner
- Advising provincial government ministries about issues relating to the professions and trades in their portfolio
- Issuing compliance orders to the non-health professions and to the trades, if necessary
- Advising the Minister of Health and Long-Term Care about a health profession's non-compliance, if necessary
- Reporting to the public and to the Ministry of Labour, Immigration, Training and Skills Development about its work.
- Conducting research to explore issues relating to fairness and identify solutions to those issues

The Fairness Commissioner does not have a mandate to help internationally trained and educated individuals get their professional licences, and does not assess credentials.

Bodies that regulate the professions and trades submit reports and implement the Fairness Commissioner's recommendations for improvement.

Source: <https://www.fairnesscommissioner.ca/en/About/Pages/Mandate.aspx>

Recommendation 3: *That the Australian Government introduce a mechanism similar to that of the Canadian Office of the Fairness Commissioner (Ontario) with a mandate to provide oversight of registration practices in regulated professions.*

4. Migration settings as a complement to the domestic workforce

While the primary objective of Australia's Refugee and Humanitarian Program is and should remain humanitarian and protection-focused, it is important to recognise that refugee and humanitarian entrants, like other migrants, also complement the domestic workforce. As highlighted earlier, the demographic profile and experiences of earlier humanitarian migration suggest the important and distinct contributions that refugees make to the Australian workforce and society. **There are changes to migration settings that would enhance or amplify these contributions.**

4.1. Expanding the Humanitarian Program

The annual Refugee and Humanitarian Program has fluctuated in size over the past decade, reaching its highest level in 35 years in 2016-17 when 21,968 visas were issued and falling to its lowest level in 45 years in 2020-21 when just 5,749 visas were granted. The 2022-23 program has a ceiling of 17,875 places. In its election platform, the Australian Labor Party put forward an aspiration to increase the Humanitarian Intake to 32,000 places: 27,000 places per year in the Humanitarian Program, with 5,000 additional places set aside for community sponsorship.²³ It is the view of the Refugee Council and many of our members that the Albanese Government is well positioned to be able to realise its aspirations in a timely and considered manner. With a significant stock of visa applications pending and capacity and willingness within the settlement sector and broader community to scale up resettlement, there is potential to meet and exceed the aspirations to expand Australia's commitment to refugee resettlement. The positive flow-on effects on the Australian labour force of an increased humanitarian intake will be felt for years to come.

Implementing the Government's commitment to expand community sponsorship to 5,000 places outside of the Humanitarian Program may also address labour shortages, especially as sponsors have a unique role in helping new arrivals find employment by utilising their social capital.

Recommendation 4: *That the Australian Government move quickly to increase the size of the Humanitarian Program to 32,000 places per annum.*

4.2. Reinstating work rights and exploring alternative visa pathways for people in Australia

Finding ways to regularise visa status and remove employment barriers for the 107,000 people who have sought asylum and are currently in Australia is vital. This is important in the context of the lengthy delays in processing onshore protection applications (for example, it takes an average of two years to process an initial application and six years for a decision which is appealed to the Administrative Appeals Tribunal).²⁴ This means that a person can be waiting in Australia for many years before they receive a decision about their refugee claim. In this time, they usually remain on a bridging visa with the same conditions as their original visa. It means their access to work rights can be limited or denied, despite the change in their personal circumstances. For example, people who entered Australia on a tourist visa often have no work rights.

RCOA is also aware of people working in areas of critical labour shortages whose claims for protection were rejected. They are often granted Bridging Visas without work rights or their Bridging Visa applications have been rejected and they remain in Australia without lawful status. Many maintain it is unsafe for them to return to their countries of origin and wish to continue working in Australia. They are put in a position of having to decide whether to stop working and rely on the charity of community groups to afford basic necessities, or work for cash. Employers have advocated to the Department of Home Affairs on behalf of these workers, asking that they be allowed to stay in

²³ ALP National Platform (2021). <https://alp.org.au/media/2594/2021-alp-national-platform-final-endorsed-platform.pdf>

²⁴ See Section 8, RCOA (2022). [Rebuilding a principled and strategic refugee program: Response to the Australian Government Discussion Paper on the 2022-23 Humanitarian Program](#)

Australia permanently as they fill labour shortages and are valued members of the community. However, **there are no alternative skilled visa pathways in the current policy settings**. The lack of alternative pathways for workers who have received a refusal on their protection claims has created a class of people vulnerable to exploitation and abuse.

Valued worker unable to remain safely in Australia: Hamid

Hamid fled Iran and arrived in Australia in 2013. Because of the date of his arrival, he is subject to different rules and is only able to get a non-substantive visa, a Bridging Visa E (BVE), every six months to maintain his lawful status. The BVE allows Hamid to remain in Australia lawfully with work rights, but he must show that he is making arrangements to leave Australia. As it is unsafe for him to return to Iran, Hamid does not want to leave Australia and is afraid that his application to renew his BVE may be rejected by the Department of Home Affairs.

Hamid wants to become a permanent resident so that he can continue working and contributing to his local community. For almost 10 years, Hamid had been working on the vegetable farms in the rural town of Gatton, Queensland where there are chronic worker shortages. The vegetable farms in Gatton rely on valued workers like Hamid. He has become a trainer and supervisor on several farms. Some of the farm owners who employ him have written letters to the Department supporting his efforts to become a permanent resident. However, there is currently no pathway for Hamid to apply for permanent residency in Australia.

Source: ABC (2022). [Thousands of asylum seekers crave certainty after Albanese vow to abolish temporary visas](#)

Instating or reinstating work rights for people who have sought protection as they move through the review and processing stages, **and exploring options for alternative skilled visa pathways for those who have received a final refusal on their protection claim**, will reduce the risk of worker exploitation²⁵ and ensure that people who have been working for many years, often in important skills shortage areas, can continue to sustain their contribution to the Australian labour force.

Recommendation 5: *That the Minister for Immigration reviews the conditions on bridging visas to reinstate or extend the right to work to people already in Australia to both support themselves and to fill labour shortages. The Minister for Immigration should also work with the Minister for Employment to identify opportunities for people already in Australia who not been successful in seeking refugee protection to have alternative visa pathways to continue their contribution in filling vital labour shortages.*

4.3. Expanding and extending the Skilled Refugee Labour Agreement Pilot

The Skilled Refugee Labour Agreement Pilot (SRLAP) is in its second year of implementation, with a small cap of 200 places.²⁶ This initiative can be seen as a constructive response to addressing Australia's skills shortages, as well as providing a durable solution for refugees with relevant skills who may not otherwise be considered for resettlement due to vulnerability criteria, and who may face significant barriers to applying for skilled migrant visas due to their refugee status. Expanding and extending the SRLAP to 5,000 places per year following the pilot is achievable, particularly in the context of considerable private sector interest in attracting overseas talent and meeting corporate social responsibility targets, and the SRLAP implementing organisation (Talent Beyond Boundaries) having over 40,000 refugees currently listed on their global skills register.²⁷

Although the pilot is still underway and requires evaluation and a potential review of existing program design and visa costs,²⁸ a scaling up of numbers within the parameters of the pilot in close consultation with Talent Beyond Boundaries is a viable short-term proposition. Following a review,

²⁵ HRLC & MSEI (2022). [Labour in Limbo: Bridging Visa E holders and Modern Slavery Risk in Australia](#)

²⁶ <https://immi.homeaffairs.gov.au/what-we-do/skilled-migration-program/recent-changes/skilled-refugee-labour-agreement-pilot-program>

²⁷ <https://www.talentbeyondboundaries.org/blog/introducing-the-australian-skilled-refugee-pilot>

²⁸ E.g., scaling the cost of visas to make the program accessible to small and medium enterprises and businesses located in regional areas, waiving some visa costs associated with secondary applicants, and ensuring settlement support is considered and resourced in program design.

the SRLAP could be scaled up to thousands with the support of the private sector, making Australia competitive in talent attraction from diverse sources.

Recommendation 6: *That the Australian Government invest in the review, expansion and extension of the Skilled Refugee Labour Mobility Agreement Pilot as an important avenue for attracting overseas talent and demonstrating its leadership as co-chair with Canada of the Global Task Force on Refugee Labour Mobility.*²⁹

5. The role of collaborative partnerships between governments, industry, unions, civil society groups and communities, including place-based approaches

A key ingredient to successful programs supporting people into sustainable and suitable employment is the inclusion of genuine partnerships among government, industry, civil society and communities. **Better engagement and purposeful partnerships have been the driving forces behind the most effective programs** to support people into employment.

5.1. Invest in programs that support refugee entrepreneurs and business development

In recognition of the skills, capacity and propensity of many refugees to set up businesses, initiatives that **help refugee and humanitarian entrants set up businesses earlier on in their settlement journey** can be an effective way to grow both employment and business opportunities. Programs that invest in refugee entrepreneurs – such as Thrive Refugee Enterprise³⁰ and Settlement Services International’s Ignite Small Business Start-Ups³¹ – or social enterprises that combine both training and employment opportunities within businesses – such as the Bread and Butter Project³², SisterWorks³³ and Mu’ooz Eritrean Restaurant and Catering³⁴ – could be expanded or replicated with targeted investment.

Recommendations made by the Centre for Policy Development in its *Seven steps to SUCCESS* (2019) report provide practical guidance on how strategic and collaborative partnerships can enable refugee entrepreneurs to flourish.³⁵

Recommendation 7: *That the Australian Government make targeted investment in initiatives that foster refugee entrepreneurship in partnership with community and private sectors.*

5.2. Ensure incentives are in place to enable collaborative partnerships

Government can play an important role in fostering collaborative multi-stakeholder relationships that lead to better employment outcomes. The Engineering Pathway Industry Cadetship (EPIC) is but one example of an initiative that brought together government (the Victorian state government), private sector and community partners to address both industry needs and facilitate employment outcomes for skilled refugees and people seeking asylum. One of the key drivers for initiatives such as this are the **incentive structures that government can include in procurement processes that can be utilised to facilitate employment transitions for jobseekers who face challenges**, such as requiring industry bidding for government contracts to meet social procurement and training targets.

Recommendation 8: *That the Australian Government ensure social procurement targets are embedded in public procurement processes and that effective models that demonstrate effective collaborations are showcased.*

²⁹ <https://www.talentbeyondboundaries.org/blog/international-leaders-launch-the-global-task-force-on-refugee-labour-mobility>

³⁰ <https://thriverefugeeenterprise.org.au/>

³¹ <https://www.ssi.org.au/services/employment/ignite>

³² <http://thebreadandbutterproject.com/about-us/>

³³ <https://sisterworks.org.au/>

³⁴ <https://www.muooz.com.au/>

³⁵ Legrain & Burridge (2019). [Seven Steps to SUCCESS: Enabling refugee entrepreneurs to flourish](#)

Case study: EPIC Program

The Engineering Pathway Industry Cadetship (EPIC) initiative is an 18-month program connecting refugees and people seeking asylum who have overseas engineering qualifications to work on Victorian major transport infrastructure projects. Cadets receive on-the-job training and support, mentoring from industry professionals, and they also complete a postgraduate Graduate Certificate in Infrastructure Engineering Management through Swinburne University. The program enables participants to become familiar with the rail and infrastructure context in Victoria and provides an untapped talent pool of cadets for companies to invest in.

Since the EPIC initiative launched in January 2020, 50 cadets have gained employment through the program with over 14 different employers. 100% of the cadets completed the Graduate Certificate and over 90% have ongoing full-time employment in industry. Major Roads Projects Victoria have also started a similar program based on the EPIC initiative.

A key element of success is the unique collaboration between government, industry and community partners which makes the EPIC initiative possible. In particular, the Victorian government has created a number of incentives and compliance measures for the transport infrastructure industry to provide opportunities for Victorian cadets. As part of the Local Jobs First Policy, the Major Projects Skills Guarantee (MPSG) requires contractors for Victorian government construction projects valued at or above \$20 million to allocate at least 10% of labour hours to apprentices, trainees and cadets.

The MPSG, along with Social Procurement requirements, have therefore incentivised the industry to participate and provide funding to the EPIC initiative. With this funding and support from government and industry, the EPIC initiative has also fostered an environment of collaboration, enabling them to organise a mentoring program connecting cadets to mentors from the transport infrastructure industry. Refugee support and employment services have also been able to jump on board: CareerSeekers provides three months on-the-job support for the cadets and their supervisors; and specialist organisations such as Jesuit Social Services provide client management and assistance with interview skills through their Jobs Victoria funding.

Source: Interview; Victoria State Government (2022). [EPIC Program](#)

6. Summary of recommendations

Recommendation 1. *The Department of Employment and Workplace Relations:*

- (a) *considers sustained funding for refugee place-based employment programs in areas of high settlement that builds on the knowledge and experience of previous pilot initiatives;*
- (b) *ensures panel members with refugee specialist expertise are funded under Workforce Australia in all areas of high refugee settlement; and*
- (c) *actively considers how reform of the Workforce Australia funding model can incentivise support for meaningful career pathways within mainstream employment services.*

Recommendation 2. *That the Australian Government commits to long-term investment in anti-racism work as a cornerstone of ensuring better employment outcomes for more Australians and fully implements findings arising from the development of the National Anti-racism Framework.*

Recommendation 3. *That the Australian Government introduce a mechanism similar to that of the Canadian Office of the Fairness Commissioner (Ontario) with a mandate to provide oversight of registration practices in regulated professions.*

Recommendation 4. *That the Australian Government move quickly to increase the size of the Humanitarian Program to 32,000 places per annum.*

Recommendation 5. *That the Minister for Immigration reviews the conditions on bridging visas to reinstate or extend the right to work to people already in Australia to both support themselves and to fill labour shortages. The Minister for Immigration should also work with the Minister for Employment to identify opportunities for people already in Australia who not been successful in seeking refugee protection to have alternative visa pathways to continue their contribution in filling vital labour shortages.*

Recommendation 6. *That the Australian Government invest in the review, expansion and extension of the Skilled Refugee Labour Mobility Agreement Pilot as an important avenue for attracting overseas talent and demonstrating its leadership as co-chair with Canada of the Global Task Force on Refugee Labour Mobility.³⁶*

Recommendation 7. *That the Australian Government make targeted investment in initiatives that foster refugee entrepreneurship in partnership with community and private sectors.*

Recommendation 8. *That the Australian Government ensure social procurement targets are embedded in public procurement processes and that effective models that demonstrate effective collaborations are showcased.*

³⁶ <https://www.talentbeyondboundaries.org/blog/international-leaders-launch-the-global-task-force-on-refugee-labour-mobility>

ADDRESSING INDUSTRY ACCREDITATION PROCESSES AS BARRIER TO EMPLOYMENT OF SKILLED REFUGEES

A CASE STUDY: DENTISTRY

As the Australian Government considers how to create pathways to more employment opportunities for more Australians in the context of low unemployment rates and significant skills shortages³⁷, the following brief outlines why **industry-run accreditation processes** present a significant barrier to skilled refugee and humanitarian entrants working in their chosen profession, despite the relevance of their qualifications and skills to the current Australian labour market and wider community.

This brief focuses on **the dentistry industry as a case study**, outlining the process of accreditation that allows overseas-qualified dentists to work in Australia, why this accreditation process is ineffective and unfair, and makes recommendations for how to facilitate better pathways to entry into this profession.

While this brief focuses on one profession, the Refugee Council of Australia (RCOA) and many other bodies representing or working with refugees and migrants³⁸ are aware of **common issues in other professional and trade fields**, with a common denominator being the complexity of qualification and skills recognition processes and the problematic power of industry bodies overseeing accreditation or licencing processes where there is weak accountability and oversight, and vested interests at play in limiting access to professions.

How many overseas-trained (refugee) dentists are there in Australia?

Australia has permanently welcomed an average of 14,000 refugee and humanitarian entrants per year since the late-1970s. In 2022-23, the Humanitarian Program will provide **17,875 permanent visas to refugees**, many of whom will arrive with significant overseas qualifications, skills and work experience.

Although it is not possible to find an accurate number of refugee and humanitarian arrivals who are dentists, the 2018/19 Australian Dental Council annual report showed that just under 10% of applicants for accreditation that year had qualifications obtained in major refugee source countries (particularly: Syria, Iraq and Iran).³⁹

Carmen

'Carmen' arrived on a permanent (Refugee) visa in 2018. Carmen obtained her general dentistry qualification from Damascus University, a top university in Syria, and worked professionally as a dentist in Saudi Arabia for over 20 years. In order to practice in Australia, Carmen is required to pass written and practical dentistry exams and an occupational English test. Carmen enrolled in a (pilot) career pathways program shortly after arriving in Australia and was supported to prepare for the accreditation process for one year. In this time, she studied for and passed the written exam. Since then, Carmen has sat the 2-day practical exam on three occasions without success. As accreditation exams are expensive, infrequent and success rates low, Carmen is not sure how to proceed and is frustrated after four years.

Despite extensive overseas work experience, qualifications, professional-level English and a strong motivation and willingness to work in a recognised skills shortage area, Carmen does not know if she will be able to work as a dentist in Australia. Carmen does not understand why peers who studied and worked alongside her in Syria and Saudi Arabia and then moved to Germany, Austria or France are all working as dentists within a year of arrival. Carmen is currently working in a hardware store and is struggling to save enough money to re-engage with the accreditation process as well as support her family.

³⁷ Employment White Paper: <https://treasury.gov.au/consultation/c2022-322158>

³⁸ SCOA (2019). Recognising Overseas Skills and Qualifications; FECCA (2022). A Secure and Successful Multicultural Workforce

³⁹ Australian Dental Council 2018/19 Annual Report, p.19. https://adc.org.au/files/corporate/annual-reports/2019_ADC_Annual_Report.pdf

Joseph

'Joseph' worked as a dentist in Syria for 27 years before civil conflict forced his family to flee and resettle in Australia. Since arriving in Australia five years ago, Joseph has been unsuccessful in passing the ADC-run practical exam on two occasions. He received a 'Fail' in technical skill areas where he considers he is experienced and proficient. He does not fully understand the expectations of examiners and how to meet these. Joseph has not wanted to contest his examination results as it costs \$5,000 for a review and he is not confident the outcome will change.

Joseph has applied for multiple jobs as a dental assistant but has not been successful. He is aware that his resume will likely discourage dentists from employing him, considering his qualifications and extensive past professional experience. (He was a supervising dentist in his own practice before leaving Syria.)

Joseph has taken out a \$35,000 loan to re-train as a dental technician. He is currently enrolled in a 3-year diploma course, even though the course covers much of what he did in his original degree and he has received no recognition of prior learning. He says: "I will do it, even if this kind of dental work is at a much lower skill level than what I was previously doing."

Accreditation process

To work as a dental practitioner in Australia, you must be accredited through the industry body, the Australian Dental Council (ADC). There are two ways to attain accreditation: (1) by completing a university degree that has been accredited by the ADC, or (2) by having your overseas qualifications and skills assessed by the ADC.⁴⁰ The second pathway, relevant to overseas-trained dentists like 'Carmen' and 'Joseph', involves four steps:

1. **Initial assessment** of eligibility to complete the dental practitioner assessment process – minimum being a 4-year full-time degree/diploma and previous registration (cost: \$610, plus cost of translating documents).
2. **Written examination** (cost: \$2,000 per attempt)
3. **Practical examination** (cost: \$4,500 per attempt, plus ~\$2,500 for equipment)
4. **Occupational English Test** for dentists (not run by ADC)⁴¹ (cost: \$587)

If these steps are successfully navigated in the shortest possible time, **it would cost an applicant around \$10,000 and at least 18 months**. As the success rates at steps 2 and 3 are extremely low (see Figure 1), it is highly likely that an applicant

seeking accreditation through the ADC-run assessment process will have to re-sit exams, meaning costs and timeframes for successful accreditation are likely much higher and longer.

Figure 1. Success rates of ADC-run assessments, FY 2018/19 to 2020/21⁴²

Stage	Number of assessments	Number passed	Success rate
Initial assessment	2,074	-	N/A
Written examination	1,855	859	46.3%
Practical examination	2,859	565	19.8%

Why is it so hard for overseas-trained dentists to get accredited to practice in Australia?

Looking at Figure 1, we see that **only 1 in 4** of the 2,074 overseas-trained dentists deemed eligible to be assessed since 2018 managed to successfully pass the ADC-run accreditation process. This very low (27%) pass rate is concerning in the context of dentistry-related jobs featuring on the Australian Government's skills shortage list⁴³, and presumably more overseas-qualified dentists arriving on skilled visas with a low chance of being able to attain the necessary accreditation to practice in Australia.

⁴⁰ See: <https://adc.org.au/assessments/dentists/>

⁴¹ See: <https://www.occupationalenglishtest.org/test-information/healthcare-professions/dentistry/>

⁴² ADC Annual Report 2020/21, pp. 27-29. https://adc.org.au/files/corporate/annual-reports/2021_ADC_Annual_Report.pdf

⁴³ Listed: Dental Hygienist (411211), Dental Prosthetist (411212), Dental Specialist (252311), Dental Technician (411213), Dental Therapist (411214), Dentist (252312). Note: Only Dental Specialists and Dentists are accredited through ADC. Others are assessed through VETASSESS or Trades Recognition Australia. See: <https://immi.homeaffairs.gov.au/visas/working-in-australia/skill-occupation-list#>

There are a range of reasons for the low success rate put forward by dentists who have both successfully and unsuccessfully navigated this accreditation process⁴⁴, including:

The accreditation examination process lacks transparency and fairness

Overseas-trained dentists report that the ADC-run examination process (particularly the practical exam) lacks transparency and fairness. The criteria under which candidates are assessed to either 'pass' or 'fail' are not always clear, and there is a lack of confidence that performance is assessed consistently. While there are assessment guidelines, there is insufficient time in how the exam is administered to realistically meet all expectations within these guidelines, even if a candidate understands and can demonstrate required skills. In some cases, the guidelines are too vague and refer to a range of texts where there can be conflicting advice as to the accepted practice. There is also insufficient feedback given to unsuccessful candidates to know which skills areas they should focus on when re-applying (results are 'pass' or 'fail' with no grade indication). ADC reporting of exam outcomes also seems to recognise a lack of discernible trends in testing, with candidates failing different 'clusters' in equal measure. If a candidate fails one cluster, they fail the exam and have to re-sit the whole exam. Many report passing a cluster in one exam and failing it in the next, suggesting testing variability rather than skills deficiency.

Finally, the option to review exam outcomes is limited by cost and the understandable fear that candidates have of contesting a decision. As the ADC exam is the only pathway to accreditation, those who have failed the exam say they do not wish to ask for a review that will cost \$5,000 (more than the cost of re-sitting the exam) and which may jeopardise a future attempt if the exam outcome review is unsuccessful.

It is not in the interests of the ADC to accredit overseas-trained dentists

While accreditation processes run by industry bodies can be seen as an important risk mitigation strategy – i.e., reducing the chance of malpractice or poor standards by vetting the skill level of dentists who are trained in other country contexts – it has been suggested that there are other and more important ways of upholding professional standards beyond gatekeeping entry into the profession.⁴⁵ Overseas-trained dentists instead see the very low accreditation rates and the enormous expense and difficulty of navigating accreditation processes as **a reflection of the interests of an industry that benefits from limiting the supply of dentists.**

We don't see the real criteria to understand the expectations. For example, you have 10 minutes to complete each station. Sometimes they are trying to waste our time during the exam; the 'patient' keeps speaking and we don't have time to meet all requirements before we have to move to the next station. They are trying to make us fail.

There is insufficient feedback to know specifically which areas I should work on. I might get 80% or 79% or maybe I get 0%. I don't know. All we see is Pass/Fail.

I know someone who passed on their fourth time. He felt like he did the worst on the exam that time. Results don't make sense.

Someone who was an applicant called me before her exam because I am a specialist in this area, and I explained a procedure to her that she was not familiar with. She passed this in the exam. I didn't. This is my area of specialisation, but I didn't pass! I have done this procedure many, many times. I don't know why I did not pass this.

ADC charge \$5,000 to review exam results. If you do contest it, you have to send someone else – another dentist – as your representative in this review. You can't even speak for yourself. It is better to re-sit than risk upsetting ADC and requesting a review. I don't know anyone who has asked for a review even though we all have similar experiences and questions about how our performance was assessed.

Source: RCOA-Australian Syrian Charity consultation with overseas-trained dentists, Melbourne, October 2022

⁴⁴ RCOA undertook a consultation with a group of Syrian dentists. At least two petitions have been previously circulated by overseas-trained dentists: <https://www.change.org/p/health-minister-demand-for-fair-evaluation-system-for-overseas-dentists>; and <https://www.change.org/p/australian-dental-council-the-dilemma-of-overseas-dentists-with-the-australian-dental-council>

⁴⁵ See CEDA (2022). Skills Recognition

As one person said:

I think the ADC are just wasting the time of candidates, which is why it is such a lengthy process. I don't think they want us to pass, especially if we are specialists, because it is competition and increases supply of dentists (and potentially what can be charged to members of the community).

In the context of the majority of dental care in Australia being left in the hands of the private rather than public sector, an industry body that controls the supply of qualified dentists is a very effective means of distorting the market.

Linked to this, **the lack of alternative pathways to accreditation** as a dentist in Australia means that power lies completely in the hands of one body and the interests it serves. This raises questions about accountability and the role of Government in ensuring that industry bodies are in some way answerable to the broader Australian community, particularly in such a critical industry as dental care.

Lack of support to successfully navigate accreditation processes

Finally, overseas-trained dentists point to the lack of support to navigate accreditation processes. For example, if receiving assistance through Workforce Australia, there is limited support to pay for professional accreditation processes that are lengthy and have low success rates. Instead, employment service providers push skilled professionals to take other work. As one man said:

If I want to work selling blinds, they will pay for my tools and help with transport. If I want to work as a dentist where my skills and interests are, there is no support to pay for or prepare for the exams. They are pushing us to find full-time jobs, but if I do this I will not have time to study and apply for exams. They are suffocating us.

More importantly, there are **no ADC-endorsed programs that help overseas-trained dentists prepare for the accreditation exams**, meaning candidates are left without support to understand expectations of this process and fill any potential gaps in knowledge to increase the chance of success.

Ibrahim

'Ibrahim' is a dental specialist who settled in Australia 10 years ago. Prior to arrival, Ibrahim qualified in general dentistry in Syria and attained four post-graduate certificates with top marks from the University of Paris. Ibrahim has attempted the practical dental examination in Australia on four occasions without success. He first passed the written examination in 2015 but has had to re-sit this after it expired.

Ibrahim has explored alternative pathways to accreditation and utilising his skills. He applied for provisional accreditation through the 'Limited Registration in an Area of Need' initiative,¹ successfully applying for a job as a dentist in a regional town under the supervision of a dental practitioner who was desperate to attract someone with his skills to the area. The request was refused when it became known that Ibrahim was scheduled to re-sit his practical exam with ADC (which he subsequently failed). Ibrahim volunteered in the Northern Territory with the Closing the Gap initiative, happy to use his dental skills to improve access to dental care. Neither of these attempts brought him closer to accreditation, although Ibrahim is happy to work in a regional area or for a community program if it means he can be accredited to practice.

Ibrahim feels like he has lost a decade of his life trying to navigate accreditation processes to practice as a general dentist in Australia. He said: *'Even if I got accreditation, I wouldn't be able to work as a specialist because I would not feel confident to do so. I have missed out on 10 years of conferences; of maintaining my skill level. I have gone backwards.'*

Ibrahim is currently working in Woolworths.