THE RECOGNITION OF OVERSEAS QUALIFICATIONS IN AUSTRALIA

Report of Committee of Inquiry

Volume 1
THE RECOGNITION OF OVERSEAS QUALIFICATIONS IN AUSTRALIA

Report of Committee of Inquiry

December 1982

VOLUME 1

Australian Government Publishing Service
Canberra 1983
My dear Minister

On 16 December 1981, the former Minister for Immigration and Ethnic Affairs, the Honourable Ian Macphee, announced the appointment and Terms of Reference of the Inquiry into the Recognition of Overseas Qualifications in Australia.

The Committee commenced the Inquiry in January 1982 and has now completed its Report. I have the honour to present to you that Report.

Yours sincerely

R.G. Fry
(Chairman)

The Hon. John C. Hodges
Minister for Immigration and Ethnic Affairs
Parliament House
CANBERRA ACT 2600

December 1982
# BRIEF TABLE OF CONTENTS

## VOLUME 1

<table>
<thead>
<tr>
<th>Chapter</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>INTRODUCTION</strong></td>
<td>1</td>
</tr>
<tr>
<td>1. SUMMARY OF RECOMMENDATIONS</td>
<td>6</td>
</tr>
<tr>
<td>2. OVERVIEW AND SOME GENERAL CONCLUSIONS</td>
<td>33</td>
</tr>
<tr>
<td>3. SCOPE OF THE PROBLEM</td>
<td>51</td>
</tr>
<tr>
<td>4. MIGRATION POLICY AND ITS IMPLICATIONS</td>
<td>62</td>
</tr>
<tr>
<td>5. SPECIAL SITUATION OF REFUGEES</td>
<td>79</td>
</tr>
<tr>
<td>6. PATHS TO THE RECOGNITION OF OVERSEAS QUALIFICATIONS</td>
<td>86</td>
</tr>
<tr>
<td>7. RELEVANCE OF ENGLISH</td>
<td>104</td>
</tr>
<tr>
<td>8. INFORMATION AND COUNSELLING SERVICES</td>
<td>121</td>
</tr>
<tr>
<td>9. NEED FOR REORIENTATION AND RETRAINING</td>
<td>131</td>
</tr>
<tr>
<td>10. GOVERNMENT STRUCTURES FOR THE ASSESSMENT AND RECOGNITION OF OVERSEAS-QUALIFIED PROFESSIONALS</td>
<td>137</td>
</tr>
<tr>
<td>11. GOVERNMENT STRUCTURES FOR THE ASSESSMENT AND RECOGNITION OF OVERSEAS-QUALIFIED TRADESMEN</td>
<td>158</td>
</tr>
<tr>
<td>12. RECOGNITION PROCEDURES IN MEDICINE</td>
<td>186</td>
</tr>
<tr>
<td>13. RECOGNITION PROCEDURES IN DENTISTRY</td>
<td>210</td>
</tr>
<tr>
<td>14. RECOGNITION PROCEDURES IN PHYSIOTHERAPY</td>
<td>230</td>
</tr>
<tr>
<td>15. RECOGNITION PROCEDURES IN PROFESSIONAL ENGINEERING</td>
<td>240</td>
</tr>
<tr>
<td>16. RECOGNITION PROCEDURES IN OTHER OCCUPATIONS</td>
<td>256</td>
</tr>
<tr>
<td><strong>ATTACHMENTS</strong></td>
<td></td>
</tr>
</tbody>
</table>

## VOLUME 2

**APPENDIXES**
## CONTENTS

**VOLUME 1**

<table>
<thead>
<tr>
<th>Chapter</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>INTRODUCTION</strong></td>
<td></td>
</tr>
<tr>
<td>Appointment of Committee of Inquiry</td>
<td>1</td>
</tr>
<tr>
<td>Terms of Reference</td>
<td>1</td>
</tr>
<tr>
<td>Members of Committee</td>
<td>2</td>
</tr>
<tr>
<td>Procedures Adopted</td>
<td>3</td>
</tr>
<tr>
<td>Committee's Conclusions</td>
<td>5</td>
</tr>
<tr>
<td>Appreciation</td>
<td>5</td>
</tr>
</tbody>
</table>

1. **SUMMARY OF RECOMMENDATIONS**
   - Synopsis of Major Recommendations | 6 |
   - Full List of Recommendations | 9 |
   - Cost of Implementation | 29 |

2. **OVERVIEW AND SOME GENERAL CONCLUSIONS**
   - Universality of the Problem | 33 |
   - Relevance of Immigration Policy and Practice | 34 |
   - Acceptance of qualified immigrants | 34 |
   - Importance of pre-migration counselling | 35 |
   - Current situation | 36 |
   - Arguments for Appropriate Recognition Procedures | 37 |
   - Logic of immigration policy | 37 |
   - Rights of individuals | 37 |
   - Importance of employment satisfaction | 38 |
   - Contribution of bicultural professionals | 39 |

Some Important Underlying Principles and Dilemmas in the Development of Recognition Procedures | 39 |
- Principles of equity | 40 |
- Choice and protection of standards | 40 |
- Bases of assessment in recognition procedures | 41 |
- Participation of immigrants in the recognition procedures | 41 |
- Place of reciprocity | 42 |
- Case for positive discrimination | 42 |
- Application of Australian standard procedures | 43 |

Significant Aspects of Recognition Procedures | 43 |
- Provision of English classes | 43 |
- Availability of counselling services | 44 |
- Importance of translation and interpreting services | 44 |
Chapter | Accessibility to assessment procedures | 45  
| Availability of reorientation courses | 45  
| Mechanics of assessment procedures | 46  
| Provision of appeal mechanisms | 47  
| Availability of retraining as an alternative to recognition | 47  
| Costs of achieving recognition | 47  

Some Important Structural Issues  
| Commonwealth and State roles in recognition | 48  
| Role of professional associations | 49  
| Portability of qualifications between States | 49  

Current Situation and the Need for Change | 50  

3. SCOPE OF THE PROBLEM  
Intake of Qualified Immigrants | 51  

Extent of the Problem in Australia  
Qualitative aspects | 56  

Conclusions | 58  

4. MIGRATION POLICY AND ITS IMPLICATIONS  
Procedures Overseas | 62  

Procedures in Australia | 74  

Policy Implications | 76  

5. SPECIAL SITUATION OF REFUGEES  
Significant Aspects of the Refugee Situation | 79  

Size and Origin of the Refugee Intake | 80  

Refugee Experiences of Recognition Procedures  
Information on training in refugees' countries of origin | 82  

Loss of refugee documentation | 83  

Counselling | 84  

English language training | 84  

Conclusions | 85  

viii
<table>
<thead>
<tr>
<th>Chapter</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>9. NEED FOR REORIENTATION AND RETRAINING</td>
<td></td>
</tr>
<tr>
<td>Introduction and Definition of Terms</td>
<td>131</td>
</tr>
<tr>
<td>Need for Reorientation</td>
<td>132</td>
</tr>
<tr>
<td>Need for Retraining</td>
<td>135</td>
</tr>
<tr>
<td>Counselling</td>
<td>136</td>
</tr>
<tr>
<td>Financial Support for Individuals</td>
<td>136</td>
</tr>
<tr>
<td>10. GOVERNMENT STRUCTURES FOR THE ASSESSMENT AND RECOGNITION OF OVERSEAS-QUALIFIED PROFESSIONALS</td>
<td></td>
</tr>
<tr>
<td>Introduction</td>
<td>137</td>
</tr>
<tr>
<td>Need for Permanent Body</td>
<td>138</td>
</tr>
<tr>
<td>Expanded Role</td>
<td></td>
</tr>
<tr>
<td>Counselling</td>
<td>139</td>
</tr>
<tr>
<td>Reorientation and retraining courses</td>
<td>140</td>
</tr>
<tr>
<td>Conduct of examinations</td>
<td>141</td>
</tr>
<tr>
<td>Constant review of assessment and recognition procedures</td>
<td>142</td>
</tr>
<tr>
<td>Right of appeal</td>
<td>142</td>
</tr>
<tr>
<td>Collaboration</td>
<td>143</td>
</tr>
<tr>
<td>Relationship of Council on Overseas Professional Qualifications to Commonwealth Registration bodies</td>
<td>144</td>
</tr>
<tr>
<td>Terms of reference</td>
<td>145</td>
</tr>
<tr>
<td>Enhanced Status</td>
<td>147</td>
</tr>
<tr>
<td>Structure of Council</td>
<td></td>
</tr>
<tr>
<td>Chairman</td>
<td>147</td>
</tr>
<tr>
<td>Chief executive officer</td>
<td>148</td>
</tr>
<tr>
<td>Membership of Council</td>
<td>148</td>
</tr>
<tr>
<td>Portfolio</td>
<td>150</td>
</tr>
<tr>
<td>Legal Status</td>
<td>152</td>
</tr>
<tr>
<td>Resources</td>
<td>153</td>
</tr>
<tr>
<td>11. GOVERNMENT STRUCTURES FOR THE ASSESSMENT AND RECOGNITION OF OVERSEAS-QUALIFIED TRADESMEN</td>
<td></td>
</tr>
<tr>
<td>Introduction</td>
<td>158</td>
</tr>
<tr>
<td>Chapter</td>
<td>Page</td>
</tr>
<tr>
<td>------------------------------------------------------------------------</td>
<td>------</td>
</tr>
<tr>
<td>Trades under the Tradesmen's Rights Regulation Act</td>
<td>159</td>
</tr>
<tr>
<td>Tripartite missions</td>
<td>161</td>
</tr>
<tr>
<td>Review of established criteria</td>
<td>163</td>
</tr>
<tr>
<td>Review of range of trades</td>
<td>164</td>
</tr>
<tr>
<td>Administrative delays</td>
<td>164</td>
</tr>
<tr>
<td>Trade testing</td>
<td>166</td>
</tr>
<tr>
<td>Technical Adviser service</td>
<td>168</td>
</tr>
<tr>
<td>Co-ordination of trade recognition and licensing procedures</td>
<td>171</td>
</tr>
<tr>
<td>Advisory role for TRRA committees</td>
<td>173</td>
</tr>
<tr>
<td>Annual report</td>
<td>173</td>
</tr>
<tr>
<td>Right of appeal</td>
<td>174</td>
</tr>
<tr>
<td>Probationary tradesman status</td>
<td>174</td>
</tr>
<tr>
<td>Trades not Covered by the Tradesmen's Rights Regulation Act</td>
<td>175</td>
</tr>
<tr>
<td>Licensed Trades</td>
<td>178</td>
</tr>
<tr>
<td>Licensing examinations</td>
<td>180</td>
</tr>
<tr>
<td>Counselling</td>
<td>180</td>
</tr>
<tr>
<td>Supervised employment</td>
<td>181</td>
</tr>
<tr>
<td>Reorientation courses</td>
<td>182</td>
</tr>
<tr>
<td>Right of appeal</td>
<td>182</td>
</tr>
<tr>
<td>Statistical information</td>
<td>183</td>
</tr>
<tr>
<td>Trades Recognition Co-ordinating Committee</td>
<td>183</td>
</tr>
<tr>
<td>Terms of reference of the TRCC</td>
<td>184</td>
</tr>
<tr>
<td>Membership of the TRCC and its sub-committees</td>
<td>184</td>
</tr>
<tr>
<td>Immigrant Representation</td>
<td>185</td>
</tr>
</tbody>
</table>

12 RECOGNITION PROCEDURES IN MEDICINE

<p>| Introduction                                                           | 186  |
| Preparation for the AMEC Examination                                  | 188  |
| Outline for Formal Supervised Hospital Practice Program               | 194  |
| Nature                                                                | 195  |
| Conditions                                                            | 195  |
| Eligibility and Selection                                             | 197  |
| Backlog                                                               | 198  |
| Ongoing demand                                                        | 198  |
| Conduct and Content of the AMEC Examination                           | 199  |
| Right of Appeal                                                       | 203  |</p>
<table>
<thead>
<tr>
<th>Chapter</th>
<th>Page</th>
</tr>
</thead>
<tbody>
<tr>
<td>Counselling</td>
<td></td>
</tr>
<tr>
<td>Counselling overseas</td>
<td>204</td>
</tr>
<tr>
<td>Counselling for the AMEC examination</td>
<td>204</td>
</tr>
<tr>
<td>Counselling on other aspects or recognition</td>
<td>205</td>
</tr>
<tr>
<td>Relationship between AMEC and COPQ</td>
<td>206</td>
</tr>
<tr>
<td>Interstate Portability</td>
<td>206</td>
</tr>
<tr>
<td>Reciprocity</td>
<td>208</td>
</tr>
<tr>
<td>13. RECOGNITION PROCEDURES IN DENTISTRY</td>
<td></td>
</tr>
<tr>
<td>Introduction</td>
<td>210</td>
</tr>
<tr>
<td>Counselling</td>
<td></td>
</tr>
<tr>
<td>Counselling overseas</td>
<td>213</td>
</tr>
<tr>
<td>Counselling for the COPQ examination</td>
<td>213</td>
</tr>
<tr>
<td>Counselling those experiencing difficulties</td>
<td>215</td>
</tr>
<tr>
<td>Candidates' Perceptions of the COPQ Examination as a Barrier to Recognition</td>
<td>215</td>
</tr>
<tr>
<td>Preparation for the COPQ Examination</td>
<td>216</td>
</tr>
<tr>
<td>Outline for Formal Supervised Practice Program</td>
<td></td>
</tr>
<tr>
<td>Nature</td>
<td>221</td>
</tr>
<tr>
<td>Conditions</td>
<td>221</td>
</tr>
<tr>
<td>Selection</td>
<td>222</td>
</tr>
<tr>
<td>Costs</td>
<td>222</td>
</tr>
<tr>
<td>Backlog</td>
<td>223</td>
</tr>
<tr>
<td>Ongoing demand</td>
<td>224</td>
</tr>
<tr>
<td>Conduct of the COPQ Examination</td>
<td>225</td>
</tr>
<tr>
<td>Reciprocity</td>
<td>228</td>
</tr>
<tr>
<td>14. RECOGNITION PROCEDURES IN PHYSIOTHERAPY</td>
<td></td>
</tr>
<tr>
<td>Introduction</td>
<td>230</td>
</tr>
<tr>
<td>The Australian Examining Council for Overseas Physiotherapists (AECOP)</td>
<td></td>
</tr>
<tr>
<td>Assessment of overseas physiotherapists</td>
<td>230</td>
</tr>
<tr>
<td>AECOP Procedures</td>
<td>231</td>
</tr>
<tr>
<td>Eligibility</td>
<td>231</td>
</tr>
<tr>
<td>The written examination</td>
<td>233</td>
</tr>
<tr>
<td>Counselling</td>
<td>234</td>
</tr>
<tr>
<td>Conduct of the written examination</td>
<td>235</td>
</tr>
</tbody>
</table>
15. RECOGNITION PROCEDURES IN PROFESSIONAL ENGINEERING

Introduction

Assessment Procedures
- Existing methods of assessment
- Discussion of assessment procedures

Other Issues
- Right of appeal
- English language
- Counselling
- Requirement for a 4 year course
- Qualifications with no Australian equivalent

16. RECOGNITION PROCEDURES IN OTHER OCCUPATIONS

Introduction

Conclusions

Recommendation

ATTACHMENTS

1. List of submissions
2. List of consultations
3. List of occupational categories
4. Extracts from Review by COPQ, DIEA and the Public Service Board of Methods and Procedures of the Secretariat of the Committee on Overseas Professional Qualifications, Canberra, March 1982.
6. Glossary of abbreviations
I  Origin and Operation of the Committee on Overseas Professional Qualifications.

II  Origin and Operation of the Tradesmen's Rights Regulation Act, 1946.

III State Licensing Requirements for Electrical Workers.

IV State Licensing Requirements for Plumbers, Drainers and Gasfitters.

V State Licensing Requirements for Hairdressers.

VI Medicine. Background Relevant to Recognition.

VII Dentistry. Background Relevant to Recognition.

VIII Physiotherapy. Background Relevant to Recognition.

IX Professional Engineering. Background Relevant to Recognition.

X Secretariat Staff.
INTRODUCTION

The Hon. Ian Macphee, the former Minister for Immigration and Ethnic Affairs stated on 16 December 1981, when the Committee of Inquiry was set up, that he had been concerned about the problems faced by migrants in Australia who have qualifications which are not recognised by the relevant State or professional body in Australia and who therefore are unable to work at the jobs for which they originally trained.

Mr Macphee also stated:

this concern I might add, is shared by the Prime Minister and by State Premiers and Ministers* as well as by Members of the Australian Council on Population and Ethnic Affairs (ACPEA).

Terms of Reference

The Committee of Inquiry shall:

1. Identify the nature and scope of the problems of non-recognition of overseas qualifications and training with particular reference to:

(a) the problems experienced by people trained overseas which are not encountered by those trained in Australia; and

* The N.S.W. Government had decided to hold an investigation but deferred it pending the outcome of this Inquiry.
2. Consider the procedures for recognition of overseas qualifications and training, with a view to identifying:

(a) whether existing legislation and procedures for the assessment and recognition of overseas qualifications are adequate and equitable;

(b) problems which arise out of the relationship between migrant selection procedures and the recognition of qualifications; and

(c) special problems experienced by refugees which are of a different quality from those experienced by migrants in general.

3. Consult widely and seek submissions from the general community and relevant bodies; such bodies to include Federal and State Governments and Authorities, licensing and registration boards, trade unions and professional associations, employer organisations, education and training institutions, ethnic communities and other bodies operating in the field of ethnic affairs.

4. Report conclusions and make recommendations to the Minister for Immigration and Ethnic Affairs on action which should be taken to overcome the problems identified.

Members of the Committee

Mr R G Fry M.B.E., - Chairman
Dr D R Cox
Mr P Georgiou
Mr R H Grahame
Mr H Hauenschild
- Australian Council on Population & Ethnic Affairs
- Australian Institute of Multicultural Affairs
- Commonwealth Tertiary Education Commission
- Australian Council of Trade Unions
The members of the Committee were appointed on the basis of their experience and continuing involvement in specific areas of relevance to the Inquiry. They were not appointed as the representatives of any organisations to which they belonged or by whom they were employed.

**Procedures Adopted**

The Committee sought submissions from individuals, ethnic and other community organisations, employers, trade unions, professional associations, licensing and registration boards, government departments and academic institutions. In response the Committee received 445 submissions and a list of these appears in Attachment 1.

Where further elaboration was thought to be necessary, the Committee held consultations with a number of organisations and individuals and a list of these appears in Attachment 2.
Faced with a task of such magnitude, (see for example, the number of occupational categories listed in Attachment 3) and the need to complete it within a reasonable time, the Committee decided to restrict its detailed examination of the processes of assessment and recognition to a limited number of professions and trades. The professions chosen were medicine, dentistry, physiotherapy and professional engineering. These were chosen as having national procedures for the assessment of overseas qualifications and a relationship with the Committee on Overseas Professional Qualifications and as being the subject of concern in a number of submissions.

The trades chosen were the metal and electrical trades because of their national recognition procedures prescribed by the Commonwealth's Tradesmen's Rights Regulation Act. In addition, consideration was given to licensed electricians, plumbers and hairdressers, to ascertain the effects of State licensing Acts and procedures upon those seeking registration.

It was felt that this detailed examination might reveal a number of issues with a wider application and that these issues in relation to other occupations could be addressed subsequently within the permanent Government machinery.

Further, the Committee decided to deal in some detail with the Commonwealth machinery already operating in the field of evaluation of overseas qualifications. There are two such bodies:

Committee on Overseas Professional Qualifications (COPQ)
Central and Local Trades Committees under the Commonwealth's Tradesmen's Rights Regulation Act (TRRA)

The Committee's Conclusions

The Committee has been able to decide on a number of recommendations which it believes will produce greater fairness and equity and avoid discrimination in the assessment and recognition of overseas qualifications. These are listed in Chapter 1.

The decisions of the Committee were arrived at after considering all the material before it and bringing to bear in its judgments the varied backgrounds and experience of its members. A consensus approach was used, so that not every member of the Committee necessarily supported every conclusion or every recommendation. Nevertheless there was overwhelming support for the consensus which the Report expresses.

Appreciation

The Committee wishes to express its appreciation to all who provided submissions, made themselves available for consultation, or in other ways facilitated the work of the Committee. It wishes also to acknowledge the dedicated work of the members of the Secretariat under the leadership of Mr John Hope-Allan.
CHAPTER 1

SUMMARY OF RECOMMENDATIONS

The recommendations of the Committee of Inquiry are presented in this chapter under three headings. First, the major recommendations of the Committee are summarised in relation to each of the major topics addressed to enable readers to appreciate the main directions for change being suggested. There follows a complete list of recommendations in the order in which they appear in the text of the report. The order reflects neither priorities nor any inherent logic other than that developed in the report. Readers are advised to study each recommendation in the context in which it is developed in the text. To assist readers to locate the recommendations in the text, the paragraph number of each is provided below and the recommendations in the body of the text are underlined. Finally, the estimated cost of implementing the recommendations is provided.

SYNOPSIS OF MAJOR RECOMMENDATIONS

A) Recognition Procedures in General

(1) English Language

Having concluded that existing provisions for English language training do not enable many immigrants with overseas qualifications to acquire sufficient English for recognition and practice purposes, the Committee recommends a review of the adult English program. (Recommendation 11)

It recommends that English language proficiency levels be established for every occupation as an essential basis for training and assessment purposes. (Recommendation 10)

It recommends an investigation of the complex issue of 'occupational English' courses. (Recommendation 12)

(2) Counselling

The Committee stresses the importance of adequate information and counselling services, both overseas and in Australia, and recommends improvements in the current situation, including both the establishment in all States of Overseas Qualifications Units and the extension of appropriate counselling to all immigrants and intending immigrants. (Recommendations 5, 8, 9, 13, 14, 15, 16, 17, 19 and 45)
The Committee recommends specifically the improvement of counselling in relation to assessment examinations. (Recommendation 18)

(3) Reorientation and Retraining

Recognising the essential role of reorientation and retraining, the Committee has made several recommendations concerning the identification of specific needs in this area and the introduction of appropriate courses. (Recommendations 20, 21 and 22)

(4) Assessment Procedures

The Committee recommends that, as far as possible assessment be carried out while the applicant is overseas and that this apply to all categories of applicants. (Recommendations 3 and 7)

The Committee recommends that a formal appeal system constitute an integral part of every assessment procedure. (Recommendations 24(h) and 83)

To ensure adequate future planning the Committee recommends that data be collected to enable the size and nature of the recognition problem to be ascertained. (Recommendations 1 and 2)

B) Recognition Procedures in the Professions

(1) Council on Overseas Professional Qualifications (COPQ)

The Committee recommends that the important on-going role for COPQ be recognised, that it become a permanent part of Commonwealth Government machinery established under appropriate legislation with amended terms of reference, and that its name be changed to the Council on Overseas Professional Qualifications. (Recommendations 23 to 31)

(2) Medicine

The Committee recommends the introduction of a program of supervised practice in teaching hospitals and the establishment of a working party to develop this. (Recommendations 58, 59 and 60)

In relation to the current AMEC examination, it recommends that the English component be separated and a Task Group established to review the examination. (Recommendations 61 and 62)
In addition, the Committee recommends improvement to the counselling provided and an examination of both portability of qualifications between States and the discriminatory nature of current reciprocity arrangements. (Recommendations 63, 64, 65 and 66)

(3) Dentistry

Recommendations made in relation to dentistry are in essence the same as those made in relation to medicine. (Recommendations 67 to 75)

(4) Physiotherapy

The Committee recommends some improvements in supervised practice arrangements, counselling and the examination arrangements. (Recommendations 76 to 80)

(5) Professional Engineering

The Committee recommends that COPQ establish an expert panel to examine assessment procedures in that profession. (Recommendation 82)

In addition it recommends a right of appeal, an improved information system, a more frequent examination and assistance for those adversely affected by the 1980 Rule requiring a 4 year training course. (Recommendations 81, 83, 84 and 85)

(6) Other Professions

In relation to other professions the Committee recommends that these be examined by COPQ. (Recommendation 86)

C) Recognition Procedures in the Trades

(1) Tradesmen's Rights Regulation Act

The Committee recommends that the powers and functions of Committees under the Act be maintained, that Tripartite Overseas Missions continue and that the Committees receive adequate resources and take appropriate steps to ensure that delays in processing are minimal and that the trades develop uniform testing arrangements. (Recommendations 32 to 38 and 44 to 47)

(2) Trades Recognition Coordinating Committee

The Committee recommends the establishment of a TRCC to provide coordination at the national level for trades not covered by TRRA with the priority task of reviewing State licensing procedures in addition to a range of other functions. (Recommendations 49 to 57)
(3) Technical Advisers

The Committee recommends that the roles of Technical Advisers be reviewed, that they include counselling among their functions and engage in investigatory visits to countries. (Recommendations 41 to 43)

FULL LIST OF RECOMMENDATIONS

Chapter 3. SCOPE OF THE PROBLEM

1. Department of Immigration and Ethnic Affairs should, in order to provide a data base for action with regard to overseas qualifications, consider amendments to its statistical collection system to identify the number of settlers entering Australia and claiming to hold professional, technical or skilled qualifications that have not been recognised and the particular occupations in which they claim to be qualified.

para. 10.

2. Central agencies dealing with qualification problems should maintain detailed statistics on caseloads, including factors such as:

(a) age and sex; period since qualifying; period since last practised;
(b) details of qualifications;
(c) period of residence in Australia and employment since arrival;
(d) ability in English;
(e) details of courses and other action undertaken to re-enter former occupations;
(f) other obstacles, apart from formal assessments, that prevent occupational re-entry; and
(g) approaches to assessment authorities; results of such approaches; applicants' comments on such approaches.

para. 23.

Chapter 4. MIGRATION POLICY AND ITS IMPLICATIONS

3. Department of Immigration and Ethnic Affairs should review its administrative directions and procedures for the referral of qualifications from overseas posts for assessment in Australia; seek out ways of cutting down referral time, and identify any
professional or technical occupations where assessment of qualifications can be carried out at overseas posts.  

para. 15.

4. Department of Immigration and Ethnic Affairs should study a sample of cases where recognition requirements have been waived for employment nominees. This should cover a spread of occupations and should endeavour to establish whether nominees have encountered significant disadvantages once they have left the employment of their original nominator. The results of this study should be taken into account in reviewing assessment procedures as recommended in recommendation 3.

para. 17.

5. As far as practicable and without infringing the objectivity of assessment bodies, advice provided to persons overseas regarding the recognition of their qualifications in Australia should show clearly the relationship of the advice to official immigration requirements.

para. 23.

6. When selection is made of Priority Three refugees, interviewing officers should give consideration among other factors to potential qualification problems and the availability of facilities in Australia to assist re-entry to former occupations.

para. 26.

7. Wherever feasible, occupational assessments should be carried out for refugees overseas as a matter of priority.

para. 28.

8. A State Qualifications Unit should be designated in each State as an appropriate focal point for dealing with overseas qualifications.

para. 37.

Chapter 7. RELEVANCE OF ENGLISH

9. Department of Immigration and Ethnic Affairs should collect all information relating to the availability and nature of English courses and ensure that this information is disseminated to all relevant bodies and to immigrants through the comprehensive counselling services recommended in para. 35 of chapter 8 (Recommendation 17).

para. 21.
10. Council on Overseas Professional Qualifications should co-operate with the DEIR and other relevant bodies to initiate a program through which each professional and trade body will be assisted to develop a detailed description of the English language proficiency required by each occupation under their charter.

para. 44.

11. Department of Immigration and Ethnic Affairs should carry out a review of its Adult Migrant Education Program aimed at defining clearly the levels and objectives of all courses and the relationship between them, and the resources necessary to achieve the objectives, and that it regularly monitors the program to ensure that at all times it relates closely to identified needs for English language training. In addition DIEA should review the existing provision of student allowances available to immigrants attending English language classes.

para. 46.

12. An expert working group of teaching and vocational training professionals should be set up to investigate and make recommendations on the development of a program for the teaching of 'occupational English'. The working group should report to the two Ministers most closely involved, the Ministers for Education and Immigration and Ethnic Affairs. Because of the technical nature of the subject the working group should be chaired by the representative nominated by the Minister for Education. The membership of the group is a matter for the joint decision of both Ministers but the Committee suggests the following possible membership for the Ministers' consideration:

Representative nominated by:

- the Minister for Education (Chairman)
- the Minister for Immigration and Ethnic Affairs
- the Vice-Chancellors' Committee
- the Principals of Colleges of Advanced Education
- the State TAFE authorities
- the Council on Overseas Professional Qualifications
- such other experts as the Ministers may identify.

para. 48.
Chapter 8. INFORMATION AND COUNSELLING SERVICES

13. Council on Overseas Professional Qualifications and Department of Employment and Industrial Relations should through the Central Trades Committees administering the Tradesman's Rights Regulation Act and the Trades Recognition Co-ordinating Committee (when formed) take steps to update and improve the range and quality of information on recognition procedures available to those counselling immigrants as well as to the immigrants themselves, the information to highlight difficulties which may be experienced by immigrants.

para. 15.

14. Department of Immigration and Ethnic Affairs should carefully re-examine its training programs for overseas selection officers with a view to improving the depth of understanding of the procedures and complexities of recognition issues, and thus improving the quality and availability of counselling at overseas posts.

para. 20.

15. The counselling process on recognition of qualifications should be extended, in all cases, to spouses of the principal applicants.

para. 28.

16. Just as for other immigrants, information on recognition and assessment procedures should be made available to refugees.

para. 30.

17. The Minister for Immigration and Ethnic Affairs through his State Government counterparts should request that State Ethnic Affairs Commissions, where they exist, or State departments responsible for Immigration and Ethnic Affairs in other States, accept responsibility for the provision of a comprehensive counselling service in their own State. The Commonwealth should make a significant financial contribution to the provision of these services. These bodies should maintain a sufficient degree of expertise and a close liaison with COPQ, Trades Committees, State Industrial Training Commissions and other State and Commonwealth licensing and registration authorities.

para. 35.

18. The responsible professional and trade authorities should take steps to improve the depth and quality of advice given to candidates for examinations and that this include:
(a) detailed information on the objectives of the examination and the standards and skills being tested, and, where possible, access to examples of past examination questions; and

(b) detailed information on pass or fail performance.

para. 39.

19. Applicants unsuccessful in gaining recognition should be further counselled to identify appropriate remedial action. Because of the specialised nature of the counselling it should ideally be provided by the authority carrying out the assessment. Where this is not practical, it will be necessary for the State agency proposed in recommendation 17 to act in a co-ordinating role with the relevant authorities.

para. 42.

Chapter 9 NEED FOR REORIENTATION AND RETRAINING

20. In situations where COPQ, Central Trades Committees, the Trades Recognition Co-ordinating Committee (when formed) or other responsible authorities identify a need for reorientation programs, favourable consideration should be given by both Commonwealth and State Governments to the provision of funds to meet that need.

para. 14.

21. The Minister for Immigration and Ethnic Affairs and the Minister for Employment and Industrial Relations should have supplementary funds available to provide assistance where the needs are identified, for the short-term funding of special projects initiated by any private or public body and aimed at assisting the reorientation of immigrants and refugees.

para. 17.

22. The Minister for Immigration and Ethnic Affairs should establish a working party to identify changes that need to be made in guidelines and arrangements for existing programs of financial support for study and training in order to ensure that persons who originally qualified overseas and now seek to be recognised in the same field in Australia have the same access to financial support as other Australian residents. The working party should have representation from DIEA, DEIR, Department of Education and Department of Finance.

para. 25.
Chapter 10. ASSESSMENT AND RECOGNITION OF OVERSEAS-QUALIFIED PROFESSIONALS

23. Council on Overseas Professional Qualifications should be seen as a permanent part of Commonwealth Government machinery and that all subsequent recommendations as to its status, structure, functions and resources be judged on this basis.

para. 14.

24. Council on Overseas Professional Qualifications terms of reference should be amended to require it to:

(a) provide detailed current information on the assessment and recognition of overseas qualifications for the use of all concerned with the rendering of advice to, or counselling of, immigrants and prospective immigrants;

(b) provide advice and assistance to immigrants and prospective immigrants seeking to have their overseas qualifications assessed and recognised;

para. 21.

(c) identify the need for and make recommendations to the Minister on, the organisation of and the provision of funds for reorientation and retraining courses;

(d) recommend to the Minister, as appropriate, the making of loans or the payment of special allowances to those attending such courses;

para. 27.

(e) conduct examinations in Australia and overseas and award certificates to successful candidates;

para. 30.

(f) review the procedures for the assessment and recognition of overseas qualifications and where such procedures are found to be inadequate or inequitable, decide upon the action necessary to rectify the position, and

. take such action where empowered so to do, or

. recommend such action to the Commonwealth and/or relevant State Minister;

para. 34.

(g) receive, investigate and attempt to resolve complaints relating to the non-recognition of overseas qualifications;
(h) decide upon and implement appeal procedures relating to the non-recognition of overseas qualifications in areas coming within its own sphere of influence;

para. 40.

(i) collaborate and cooperate with relevant Commonwealth and State departments and bodies and other relevant authorities to encourage the development of acceptable national assessment and recognition procedures; and

para. 44.

(j) ensure as far as lies within its powers the coordination of its activities within the total immigration policy and settlement program.

25. The word 'Council' should be substituted for the word 'Committee' in the name of COPQ and that the name be 'Council on Overseas Professional Qualifications'.

para. 52.

26. The Minister in considering the appointment of Chairman of the Council on Overseas Professional Qualifications, should take into account not only the need for an able and eminent person to provide the highest level of leadership possible but the desirability of the position being a part-time one if this can also be achieved.

para. 57.

27. The appointment to the position of Chief Executive Officer should be at the level of second division of the Commonwealth Public Service.

para. 61.

28. A Council of fifteen should be appointed as follows:

Chairman - appointed by the Minister for Immigration and Ethnic Affairs

3 members being senior second division officers appointed from each of

- Department of Immigration and Ethnic Affairs,
- Department of Education,
- Department of Employment & Industrial Relations.
7 members being one representative of each of the States and the Northern Territory selected in consultation with the appropriate State Minister and appointed by the Minister for Immigration and Ethnic Affairs.

4 members appointed from the general community by the Minister for Immigration and Ethnic Affairs.

para. 72.

29. The scope of the Council on Overseas Professional Qualifications functions should be overseas professional, sub-professional, technical and general academic qualifications and COPQ remain responsible to the Minister for Immigration and Ethnic Affairs.

para. 78.

30. The Council on Overseas Professional Qualifications should be established by, and its operations authorised by, appropriate legislation.

para. 88.

31. Resources should be made available to COPQ to enable:

(a) the implementation, as a matter of priority, of the recommendations and conclusions of the Departmental Review Team (March 1982) as to staff, equipment and future establishment; and

(b) the appointment of an enlarged Council, a part-time Chairman, a chief executive officer of second division level and staff to assist in carrying out the additional functions proposed. (Recommendations 24 to 28).

para. 98.

Chapter 11 ASSESSMENT AND RECOGNITION OF OVERSEAS-QUALIFIED TRADESMEN

32. The powers, functions and Committees under the Tradesmen's Rights Regulation Act (TRRA) should be maintained.

para. 17.

33. The TRRA should continue to be the responsibility of the Minister for Employment and Industrial Relations.

para. 18.
34. There should be annual Tripartite Missions to countries which are sources of immigrants for the purpose of establishing criteria for recognising trade qualifications.  

para. 27.

35. The Central Trades Committees should make recommendations on an annual basis to the Minister for Employment and Industrial Relations on suitable means of reviewing long established criteria.

para. 34.

36. Sufficient resources should be made available to the Central Trades Committees to allow the Committees to keep their schedule of trades under continual review to allow for technological changes.

para. 37.

37. The delays in processing applications by both the Central and Local Trades Committees should be kept under review and procedures, new technologies and work methods, together with allocations of resources should be examined where necessary. The Minister for Employment and Industrial Relations should arrange for such a review to be undertaken.

para. 48.

38. The Minister for Employment and Industrial Relations should consider providing resources to allow the Central Trades Committee to:

(a) establish, for each trade, uniform trade testing arrangements using a suitable range of tests; and

(b) regularly review the standard, content and range of trade tests (together with the method of reporting assessments) to take account of current requirements of each industry in each trade and to ensure that the tests remain fair, valid and reliable.

paras 54 and 55.

39. Trade testing facilities should be made available overseas, wherever practicable.

para. 58.

40. Trade testing facilities should be available, where feasible, to assess refugees in transit countries.

para. 59.

41. The Department of Employment and Industrial Relations and the Department of Immigration and Ethnic Affairs, in consultation with the Central Trades Committees, should review the control, role, functions and
geographic placement of the Technical Adviser Service following the 1982 Tripartite Mission to Europe.

para. 68.

42. Optimum service by the technical advisers should include the counselling of immigrant applicants and refugees on recognition and on employment prospects and conditions and other requirements such as licensing.

para. 71.

43. Technical advisers should make investigatory visits to significant immigrant source countries for which no criteria have been established to study and report to the Central Trades Committees on vocational education, training and employment arrangements. These visits should be planned and conducted in co-ordination with the program of annual Tripartite Missions.

para. 75.

44. The Central Trades Committees with the co-operation of Commonwealth and State governments and the relevant licensing authorities or co-ordinating bodies should examine the trade recognition and licensing, registration or certification procedures with a view to removing any inconsistencies. The uniform acceptance of known overseas qualifications should also be examined.

para. 79.

45. Up to date written explanations of licensing requirements and procedures and their effects on employment prospects should be provided to prospective immigrants in their own language and that procedures be instituted to obtain from persons accepted for migration in licensed trades, written acknowledgement that they received and read these explanations.

para. 82.

46. The Central Trades Committees should report regularly to the responsible Minister on all aspects of the TRRA machinery in order to maintain its efficiency.

para. 86.

47. The Central Trades Committees should jointly produce an Annual Report on the Tradesmen's Right Regulation Act operations including the operations of the Technical Adviser Service.

para. 88.
48. The Government should give consideration to providing practical assistance to encourage greater use of probationary tradesman status arrangements.  

para. 95.

49. A committee, named the Trades Recognition Co-ordinating Committee (TRCC), should be established by the Minister for Employment and Industrial Relations to provide co-ordination at the national level for trades not covered by TRRA.

para. 103.

50. The role of the TRCC should also cover the licensed trades.

para. 117.

51. The TRCC should give priority to a review of the State licensing procedures with a view to establishing national uniformity within occupations in assessment procedures, examinations and recognition of overseas qualifications.

para. 120.

52. Licensing authorities should, through the TRCC, liaise with the Department of Immigration and Ethnic Affairs on the selection process for prospective immigrants in the licensed trades to ensure that:

. prospective immigrants receive full counselling and written information on licensing and registration requirements and procedures; and

. prospective immigrants have an opportunity to begin learning technical English and preparing for licensing and registration examinations prior to their departure.

para. 123.

53. The responsible licensing authorities should assist applicants in Australia or prospective applicants overseas to find suitable employment when the applicant is likely to experience difficulty in finding supervised employment.

para. 126.

54. Licensing authorities should make applicants fully aware of the avenues of appeal open to them following any decision regarding their application for a licence.

para. 129.

55. Licensing authorities should compile on a regular basis statistical information on applicants with overseas training and qualifications to allow them to
look at their procedures objectively and to assist authorities in planning English and technical courses for migrants and refugees.

para. 130.

56. The Trades Recognition Co-ordinating Committee should be given the following functions:

(a) determine priorities and needs for portability and/or national recognition of qualifications in specific trades or groups of trades;

(b) seek the co-operation of State licensing and training authorities in achieving national consistency in licensing and trade recognition arrangements;

(c) liaise with the Central Trades Committees where licensed trades are under the Tradesmen's Rights Regulation Act (TRRA) to ensure that trade recognition and licensing procedures are closely co-ordinated and duplication of processing avoided;

(d) gather information in the trades not covered by the TRRA on vocational education, technical training, employment and recognition arrangements, together with general licensing arrangements in overseas countries;

(e) provide a central source for information on licensing and recognition of qualifications in trades not covered by the TRRA;

(f) co-ordinate and develop as necessary and with the agreement of the States and Territories, arrangements for the assessment of individual applicants for recognition in trades not covered by the TRRA;

(g) establish sub-committees as required in areas which may include the following:

- licensing of electrical workers
- licensing of plumbers, drainers and gasfitters
- licensing of other trades or trade related groups
- recognition of trades not covered by the TRRA, that is a separate sub-committee for each trade or group of trades as required;

(h) seek the co-operation of State licensing and training authorities in maintaining and developing reorientation programs to meet identified needs;
(i) arrange conferences, seminars and working parties with a view to implementing these terms of reference; and

(j) report fully on the activities of the Trades Recognition Co-ordinating Committee (TRCC), once a year, in a form to be tabled in the Commonwealth Parliament, and which may be tabled in State Parliaments.

para. 132.

57. The TRCC consist of two senior representatives nominated from each of the following groups under the chairmanship of a nominee of the Minister for Employment and Industrial Relations:

. national employers organisations;
. national employees organisations;
. State/Territory training authorities; and
. State/Territory licensing authorities.

para. 133.

Chapter 12. MEDICINE

58. There should be introduced a co-ordinated, planned program of supervised practice in teaching hospitals throughout Australia to aid in the preparation of candidates described in para. 18 for the AMEC Part II clinical examination. To achieve this it recommends that the Minister for Immigration and Ethnic Affairs appoint a special Working Party financed by the Commonwealth which would, in conjunction with the Council on Overseas Professional Qualifications, develop further and implement the suggested program. The Committee suggests that the Working Party:

(a) include the following interests and areas of expertise:

. Deans of Medical Schools;
. State Health Commissions;
. General medical practice - either through the Royal College of General Practitioners' educational programs or from those involved in the provision of medical services to immigrants;
. Medical postgraduate education - from those involved with the administration of postgraduate training in teaching hospitals and with particular interest in practitioners from overseas; and
. Ethnic affairs organisations involved in immigrant welfare in the field of health;
(b) develop and make recommendations on suitable means for providing supervised hospital practice for candidates preparing themselves for the AMEC examination, and in particular to consider:

(i) the number and cost of supervised practice positions;
(ii) liaison between supervisors and AMEC examiners;
(iii) means of monitoring progress in supervised practice;
(iv) means of selection to supervised places;
(v) income support for candidates and cost recovery from candidates; and
(vi) administrative machinery; and

(c) report to the Minister for Immigration and Ethnic Affairs as a matter of urgency.

para. 26.

59. Participation in the supervised practice program should be optional and candidates of exceptional ability or from comparable medical training systems to those in Australia remain free to proceed directly from the AMEC Part I theory examination to the AMEC part II clinical examination.

para. 38.

60. Income support should be made available for candidates taking part in the supervised practice program (Recommendation 58) at a level equivalent to unemployment benefit ($6250 per annum), such support being made available in the form of a non-interest bearing loan:

. to be repaid within 4 years of registration;
. the granting of the loan to be determined by COPQ;
. the loan and repayment to be administered by the Commonwealth Department of Education or other appropriate body on behalf of COPQ; and
. repayment of the loan to be monitored by COPQ.

para. 40.

61. English should be separated from Part I of the AMEC examination and be a pre-requisite for eligibility to sit the Part I examination, so that a candidate's failure to pass English is not counted against the candidate's possible three attempts, and further that the standard of English to be tested be clearly established as recommended in para. 44 of chapter 7.

para. 60.
62. The Minister for Immigration and Ethnic Affairs should appoint a Task Group of independent experts to undertake, in conjunction with COPQ, a thorough review of the AMEC examination. The Committee suggests that the guidelines for this Task Group be as follows:

(a) to include:

- a representative of Deans of medical schools;
- a medical educationist in the field of general/community practice;
- a medical educationist experienced in clinical examinations at the undergraduate level;
- an educational testing expert from outside the field of medical education; and
- a representative of community interests drawn from outside the medical profession;

(b) to examine in particular the English test currently used in Part I AMEC and methods of examination of clinical competence which ensure that elements of bias are minimised, the testing of candidates is more amenable to comparison and reproduction, and objectivity is enhanced;

(c) to take into account material produced to this Inquiry by way of submissions, evidence presented in consultations, and secretariat research; and

(d) to report to the Minister for Immigration and Ethnic Affairs as a matter of urgency.

para. 66.

63. AMEC should improve the depth and quality of advice given to candidates wishing to present for the AMEC examination and this should include:

- detailed information on the objectives of the examination and the standards and skills being tested;
- access to examples of past examination questions; and
- detailed information on pass or fail performance at both Part I written theory and Part II clinical examinations.

para. 73.
64. In carrying out the recommendation on counselling overseas and in Australia, and on advice and assistance referred to in paras 16 to 21 of chapter 10, COPQ should give special attention to the needs of overseas qualified medical practitioners.

para. 76.

65. The Minister for Immigration and Ethnic Affairs should refer the issue of portability between States of medical registration based on overseas qualifications to the Commonwealth Minister for Health, for referral to the conference of the Commonwealth/State Ministers for Health regarding the development of means to overcome the difficulties facing such medical practitioners, and further that COPQ keep progress towards resolution of these difficulties under active review.

para. 83.

66. The Commonwealth Government should ensure that the question of the continuing existence of reciprocity in relevant Commonwealth and State Acts, and hence discrimination, is considered at the next Conference of Commonwealth and State Ministers for Health and that the Ministers carefully examine the balance of the benefits said to attach to reciprocity against the cost to the whole community of continuing such discrimination and, further, that the Conference of Commonwealth and State Ministers for Immigration and Ethnic Affairs should keep this matter under review.

para. 90.

Chapter 13. DENTISTRY

67. The Expert Panel in Dentistry should improve the depth and quality of advice given to candidates for examination and this should include:

- detailed information on the objectives and the standards and skills being tested;

- access to examples of past examination questions; and

- detailed information on pass or fail performance at both the written theory and the clinical examinations.

para. 27.

68. In carrying out the recommendations on counselling overseas and in Australia, and on advice and assistance in paras 16 to 21 of Chapter 10, COPQ should give special attention to the needs of overseas qualified dentists.

para. 29.
69. There should be introduced a co-ordinated, planned program of supervised practice in dental hospitals throughout Australia to aid in the preparation of candidates for the COPQ Part III clinical examination in dentistry. To achieve this it recommends that the Minister for Immigration and Ethnic affairs appoint a special Working Party financed by the Commonwealth which would, in conjunction with COPQ, develop further and implement a program of the kind outlined at paras 46 to 68. The Committee suggests that the Working Party:

(a) include the following interests and areas of expertise:

- Deans of dental schools
- Directors of dental hospitals
- State health authorities
- field of general dental practice
- State Government organisations concerned with immigrant welfare

(b) develop and make recommendations on suitable means for providing supervised practice for candidates preparing themselves for the COPQ Part III clinical examination in dentistry, and in particular to consider:

(i) the number and cost of supervised practice positions;

(ii) liaison between dental hospital authorities and dental faculties;

(iii) liaison between supervisors and COPQ examiners;

(iv) means of monitoring progress in supervised practice;

(v) means of selecting candidates for supervised practice;

(vi) income support for candidates, and cost recovery from candidates; and

(vii) Administrative machinery; and

(c) report to the Minister for Immigration and Ethnic Affairs as a matter of urgency.

para. 45.
70. Participation in the supervised practice program should be optional, and candidates of exceptional ability or from comparable dental training systems to those in Australia should remain free to proceed directly from the COPQ theory examination to the COPQ Dental clinical examination.

para. 57.

71. Income support should be made available for candidates taking part in the supervised practice program (Recommendation 69) at a level equivalent to unemployment benefit ($6250 per annum), such support being made available in the form of a non-interest bearing loan:

- to be repaid within 4 years of registration,
- the granting of the loan to be determined by COPQ;
- the loan and repayment to be administered by the Commonwealth Department of Education or other appropriate body on behalf of COPQ, and
- repayment of the loan to be monitored by COPQ.

para. 59.

72. The English examination should be separated from the theory examination and a satisfactory English pass be a prerequisite for sitting the theory papers, and further the standard of English to be tested should be clearly established as recommended in para. 44 of chapter 7.

para. 72.

73. The Minister for Immigration and Ethnic Affairs should appoint a Task Group of independent experts to undertake, in conjunction with COPQ, a review of the dentistry examination. The Committee suggests that the guidelines for this Task Group be as follows.

(a) to include:

- a representative of Deans of dental schools,
- a dental educationist,
- an educational testing expert from outside the field of dental education, and
- a representative of community interests drawn from outside the dental profession,

(b) to take into account material produced to this Inquiry by way of submissions, evidence presented in consultations, and secretariat research, and
(c) to report to the Minister for Immigration and Ethnic Affairs as a matter of urgency. para. 75.

74. Three attempts at the COPQ dental examinations should be allowed in future in lieu of the present two. para. 76.

75. The Commonwealth Government should ensure that the question of the continuing existence of reciprocity in relevant Commonwealth and State Acts, and hence discrimination, is considered at the next Conference of Commonwealth and State Ministers for Health and that the Ministers carefully examine the balance of the benefits said to attach to reciprocity against the cost to the whole community of continuing such discrimination, and further, that the Conference of Commonwealth and State Ministers for Immigration and Ethnic Affairs should keep this matter under review. para. 86.

Chapter 14. RECOGNITION PROCEDURES IN PHYSIOTHERAPY

76. The Australian Examining Council for Overseas Physiotherapists (AECOP) candidates should be allowed a maximum of three attempts at the examination in lieu of the present two. para. 22.

77. COPQ should ensure that its counselling procedures are adequate for all overseas qualified physiotherapists applying for or undertaking the examinations. para 34.

78. COPQ, through AECOP, should take steps to formalise arrangements for supervised practice for overseas candidates and delegate the supervision of the period of supervised practice to the appropriate School of Physiotherapy, which should:

- enrol the therapist as a miscellaneous student in order to undertake the supervised clinical practice;
- maintain liaison with approved hospitals to ensure that appropriate staff are willing and able to assist;
- assist supervisors in hospitals to plan and execute individualised training programs; and
- counsel physiotherapists on any other related problems. para. 45.
79. The Commonwealth Government should make arrangements for income support by way of repayable loan to be made available to trainees and provide special funds to the States, earmarked for COPQ physiotherapy candidates, at the rate of $2500 per training place.

para. 47.

80. COPQ should enable certain candidates from those countries where programs are similar to Australia's to undertake the practical examination without completing the full period of supervised practice.

para. 60.

Chapter 15. RECOGNITION PROCEDURES IN PROFESSIONAL ENGINEERING

81. The Institution of Engineers, Australia, should, in relation to its examination in professional engineering, consider making it available twice a year instead of once.

para. 19.

82. The Minister for Immigration and Ethnic Affairs should require COPQ to establish an expert panel for professional engineering and make available the necessary finance to enable the panel to provide COPQ and the Minister a report on:

(i) whether, having regard to all the circumstances, including the fact that professional engineering is a non-registrable profession, the present system of an assessment of documents, professional interview and test by examination should be retained with any improvements recommended;

(ii) whether, in order to achieve the optimum of objectivity some different method of assessment should be adopted; and

(iii) the cost of any change recommended and who should bear that cost.

para. 33.

83. A right of appeal should be introduced from the decisions of the Institution of Engineers, Australia, on matters of assessment and that the form this should take be a matter for discussion and decision between the Institution and COPQ.

para. 35.
84. The Institution of Engineers, Australia, should produce for those involved in counselling current relevant information for the advice and counselling of overseas qualified professional engineers in regard to assessment of their qualification.  

para. 38.

85. The Institution of Engineers, Australia, should consider introducing a qualifying period of professional experience together with additional post-graduate study for overseas qualified professional engineers who are adversely assessed because of the 1980 rule, so that they can qualify for membership of the Institution.

para. 47.

Chapter 16. OTHER OCCUPATIONS

86. In relation to occupations not dealt with by this Inquiry the issues raised by submissions should be referred, as appropriate, to COPQ and the relevant trade committee for examination and report to the Minister concerned, and the matter kept under review by the Commonwealth/State Ministers for Immigration and Ethnic Affairs.

para. 11.

COST OF IMPLEMENTATION

A number of recommendations may not involve any immediate additional cost. They may be capable of implementation by existing staff within current budgets by a reassessment of priorities and programs. Examples of this are those recommendations relating to the provision of better information, the preparation and publication of pamphlets on procedures for the assessment and recognition of overseas qualifications, and the training program for migration officers proceeding overseas.

Other recommendations will involve expenditure on a 'one-off' basis to investigate and recommend programs which the Committee believes to be essential but on which the Committee lacked the expertise to lay down detail. Examples of this are those recommendations relating to the need to provide reorientation courses of supervised practice in medicine, dentistry and physiotherapy. The costs of these investigations have been estimated and are set out below, but the Committee, not knowing the outcome of the further investigations recommended, is unable to give any precise cost of implementing these supervised practice courses. Nonetheless, as a guide, estimates are given on the order of the probable costs.
The Committee recognises that much of the success in achieving an equitable system for the recognition of overseas qualifications is dependent upon Commonwealth and State Government structures. The Committee concluded that both COPQ and the TRRA Committees were in need of greater resources and the increased recurrent expenditure recommended is set out. It also concluded that the Commonwealth should make a significant contribution to State Governments for the operation of Overseas Qualifications Units and an amount is suggested for this purpose.

'One-off' Expenditure

(1) English Language

Review of the 'occupational English' program. (Recommendation 12) $55,000

(2) Medicine

Development of a program of supervised practice (Recommendation 58) $25,000
Review of the AMEC examination (Recommendation 62) $25,000

(3) Dentistry

Development of a program of supervised practice (Recommendation 69) $25,000
Review of the dentistry examination (Recommendation 73) $25,000

(4) Engineering

Review of assessment procedures (Recommendation 82) $20,000

Recurrent Expenditure

(1) COPQ

To provide for an enlarged Council additional functions and staff. (Recommendations 23 to 31)
Cost per annum $250,000
(2) State Overseas Qualifications Units

Contribution to State Governments to establish and/or run Overseas Qualifications Units. (Recommendations 8 & 17)
Annual contribution to the order of $250,000

(3) Tradesmen's Rights Regulation Act Committees

To provide for additional functions, to reduce delays and to improve trade testing. (Recommendations 32 to 57)
Cost per annum $150,000

(4) Trades Recognition Coordinating Committee

To enable the TRCC to carry out its functions in relation to non-TRRA trades and licensed trades. (Recommendation 49)
Cost per annum $50,000

(5) Reorientation Courses

To provide a fund for assistance for short-term special projects related to reorientation. (Recommendation 21)
Cost per annum $50,000

(6) Medicine

To provide a supervised practice program for 20 students per annum. (Recommendation 58)
Cost per annum $100,000

To provide a supervised practice program for the estimated backlog of persons with overseas medical qualifications at the rate of 60 students per year for 3 years (Recommendation 58)
Cost per annum (for 3 years) $300,000

(7) Dentistry

To provide a supervised practice program for 5 students per annum (Recommendation 69)
Cost per annum $25,000
To provide a supervised practice program for the estimated backlog of persons with overseas dentistry qualifications at the rate of 20 students per year for 2.5 years. (Recommendation 69)
Cost per annum (for 2.5 years) $100,000

(8) Physiotherapy

To provide a supervised practice program for 8 students per annum. (Recommendation 78)
Cost per annum $20,000

To provide a supervised practice program for the estimated backlog of persons with overseas physiotherapy qualifications at the rate of 10 students per year for 2 years. (Recommendation 78)
Cost per annum (for 2 years) $25,000
CHAPTER 2
OVERVIEW AND GENERAL CONCLUSIONS

1. It is important for all concerned with the recognition in Australia of qualifications obtained overseas to recognise the complexity of the subject. It has been important for this Committee to develop an appreciation of that complexity, and the purpose of this chapter is to share that appreciation with the reader. Some of the issues touched upon in the following overview clearly warrant careful detailed treatment and this is provided in subsequent chapters. It should also be noted that, while the way in which this overview is written reflects the views of the Committee, it is not its purpose to either present or argue the Committee's findings and recommendations. This overview does, however, reflect the Committee's understanding of the total situation which is fundamental to the decisions on specific matters that it ultimately adopted.

UNIVERSALITY OF THE PROBLEM

2. In the course of its deliberations the Committee became aware that the problem it was addressing was not peculiar to Australia. All countries of immigration have been obliged to develop their own recognition procedures and many have not found it to be an easy task. One Canadian authority (a) wrote to the Committee in these terms:

This has always been a thorny question here, and voluntary agencies and ethnic groups have frequently complained that standards are too high, the opportunities for upgrading too limited and the attitudes of professional associations too rigid.

In a major American study of this subject Stein (b) discusses the significance of the non-recognition of degrees and skills and of the need for bridging and reorientation courses. A short study of the situation in France (c) found that 37 per cent of professionals from Vietnam had become manual workers

(a) Professor Freda Hawkins, University of Toronto, Department of Political Science. Letter to Committee of Inquiry into the Recognition of Overseas Qualifications, 8 October 1982.


and that upward mobility was modest. Finally, it is interesting to note that a 1980 conference on Indo-Chinese refugees held in Geneva concluded that in most countries of resettlement 'recognition of educational qualifications is problematic'.

3. The difficulties encountered in developing adequate procedures for the recognition of overseas qualifications are not peculiar to Australia. Nor indeed are they a new phenomenon in Australia. Inability to enter the professions and trades for which they had been trained was a significant problem in the 1950s, particularly in relation to refugees from Eastern Europe but also for those from elsewhere. Since then it has been a constant source of difficulty, despite some gradual improvements. The arrival of large numbers of refugees from south-east Asia from 1975 on, and the significant broadening of the range of immigrant source countries during the 1970s were instrumental in bringing the issue again to the fore. The N.S.W. government had in fact decided to undertake an investigation of the whole question but decided to defer its investigation when the formation of this Committee of Inquiry was announced. It is thus an issue of very real significance both in Australia and in other countries of immigration.

RELEVANCE OF IMMIGRATION POLICY AND PRACTICE

Acceptance of Qualified Immigrants

4. The immigration policy which Australia has followed in recent years and continues to follow is one in which the intake is divided into several categories. Within each of these categories individuals possessing qualifications are admitted; however, the procedures relating to their admission vary with the different categories. The Labour Shortage and Business Migration category is there to enable Australia to recruit persons with those skills that are considered to be in demand at the time. The expectation is that these skills can be and will be utilised within Australia. The Family Migration category is based on the rights and needs of those resident in Australia to sponsor close relatives to join them, and some of these relatives will possess qualifications which may or may not be recognised and/or needed in Australia. The Refugees and Special Humanitarian Programs category reflects Australia's desire to assist in some world situations where resettlement is a pressing need. Most of those selected within this category cannot or do not have their qualifications assessed prior to arrival in Australia and there is no requirement that any should be so assessed. Similarly, in relation to the Special Eligibility category, overseas migration selection procedures are not applied to the bulk of this category which is the

trans-Tasman segment. Finally, it should be noted that the assessment of qualifications prior to migration is mandatory only in the Labour Shortage and Business Migration category and only in respect of the principal applicant of the family. Where assessment is sought in other cases, it is usually restricted to the major breadwinner in the family despite the fact that many of their spouses possess qualifications which they desire to utilise in Australia for employment purposes.

5. The net result of the above policies is that a considerable number of qualified persons are admitted to Australia each year. Further, only a proportion of these persons have been selected because of the qualifications that they possess and, therefore, on the assumption that they will be able to make use of those qualifications in Australia. Furthermore, only a proportion of this category of persons selected on the basis of their qualifications have those qualifications fully assessed prior to their migration, so that ultimate recognition in Australia of those qualifications is not guaranteed.

6. The Committee considers and stresses that the appropriate method of controlling the impact of immigration on the labour market is the immigration policy. Qualification recognition procedures should not be used for this purpose.

Importance of Pre-migration Counselling

7. It is clearly important that all applicants seeking to enter Australia, regardless of the category under which they apply, should be made aware of the status in Australia of their qualifications and/or of the procedures available for both the assessment and final recognition of those qualifications. It is recognised that sometimes information is provided but not heeded by the applicant. It is therefore important that the manner and context in which this information is provided are such as to maximise the possibilities of it being understood and heeded. It should therefore be provided, where possible, within a counselling situation as well as in writing.

8. It is also highly desirable, wherever it is possible, that the qualifications of applicants are assessed for recognition purposes prior to the acceptance of those applicants for entry. This may involve sitting for the appropriate assessment examinations at the overseas post or forwarding all relevant documentation to the accrediting body in Australia. If qualifications are not recognised, applicants can be either refused entry or advised to review their earlier decision.
Current Situation.

9. As a result of the immigration policy outlined, (See Chapter 4) Australia has accepted as immigrants(a) large numbers of people possessing overseas qualifications. The available evidence suggests that the outcome has been highly variable. Depending on the trade or profession involved, on the country from which persons have come, on the precise particulars of their qualifications, and on a range of personal factors such as age and ability to master English, some of these immigrants have moved quickly into their trades or professions, some have done so only with great difficulty, while others have never achieved this goal. The reasons for these variable results are complex. To some extent, given the nature of the immigration policy, they have been inevitable. To some extent they are a reflection of inadequacies in the procedures for assessment and recognition that have been developed in Australia, some of which will become apparent later in this chapter. Finally, to some extent they reflect a confusion of manpower and assessment issues in that recognition has sometimes been withheld because an occupation was perceived as being, or likely to be in the near future, in a situation of over supply.

10. The Committee's view is that immigration policies and practices should be constantly monitored to ensure that immigrants possessing overseas qualifications are not admitted under a serious misapprehension. It is advantageous to neither Australia nor the persons concerned if immigrants arrive with the expectation that they will be able to enter their trade or profession and for that expectation to remain unrealised.

11. Clearly, failure to enter those occupations for which they were originally trained has a range of implications for both immigrants and society. Not least among these implications is the fact that non-recognition tends to restrict these immigrants to lower socio-economic levels in society, thereby significantly and adversely affecting their involvement in society's decision-making structure and processes, as highlighted in a major report on this subject(b).

12. It is also the Committee's view that all assessment procedures should be fully accessible to potential immigrants overseas where appropriate as well as to all immigrants in Australia. This implies that assessment structures be

(a) In this report, the term 'immigrant' is used to include all categories referred to in para. 4 and embraces refugees.

adequate, that information and counselling be readily available
and that the actual assessment mechanisms be based on sound
principles.

13. Finally, the Committee is of the strong opinion that
accreditation and manpower or employment issues are, and should
be kept, distinct.

ARGUMENTS FOR APPROPRIATE RECOGNITION PROCEDURES

Logic of Immigration Policy

14. It has been pointed out that a consequence of
Australia's immigration policy is the entry of substantial
numbers of persons possessing overseas qualifications. Some of
these are accepted for the predominant reason that Australia is
considered to need the skills that they possess. It would seem
to follow logically that such individuals should be accepted
only if it is already established that their qualifications are
acceptable and that they will be able to contribute their
skills at an appropriate level within the Australian
work-force. If this is not possible prior to acceptance, then
it seems logical that adequate assessment, together with
orientation and retraining facilities, be available within
Australia for the same reason.

15. We have also noted already that substantial numbers
enter Australia as a result of humanitarian and social
obligations rather than manpower needs. A major if general
criterion used in the selection of these people is their
ability to settle within Australia to their satisfaction and
the satisfaction of the receiving society. The evidence
suggests, however, that an inability to enter the trade or
profession for which they were trained results, in many
instances, in a high level of dissatisfaction. Moreover, such
an inability represents a waste of valuable human resources,
both directly because skills are not used and indirectly
because dissatisfied individuals contribute less to society.
It would, therefore, appear that if an immigration policy is to
be successful it needs to be complemented by appropriate
settlement policies including, in this instance, a policy which
provides adequate opportunities for the recognition of existing
skills or for developing them further.

Rights of Individuals

16. As the submission to the Committee from the Human Rights
Commission pointed out, Australia is a signatory of the
International Covenant on Civil and Political Rights and this
fact has some relevance to the rights of individuals. Our
attention was drawn in other submissions to the various
Recommendations and Conventions of the International Labour
Organisation. These submissions, and the conventions to which
they refer, remind us that as a country of immigration we have
certain obligations towards those whom we admit. Two such
obligations, encompassed in an International Labour Organisation recommendation, are:

as far as possible, intending migrants for employment should, before their departure ..., be examined for purposes of occupational and medical selection; and
to ensure, where necessary, vocational training so as to enable the migrants for employment to acquire the qualifications required in the country of immigration.

17. The International Covenant on Civil and Political Rights includes the right of members of an ethnic minority to use their own language. This implies the right of access to bilingual professionals, a very relevant question to which we shall return later. It also rejects discrimination based on language. An implication of this, in the words of the Human Rights Commission, is:

any language test included in assessments of professional capacity should not be related to academic fluency or any form of general social intercourse, but only to professional facility.

Again this is of relevance and should be borne in mind as we examine assessment procedures.

Importance of Employment Satisfaction

18. In western societies generally the importance attached to both the status and nature of employment is very great, and this is applicable to former immigrants as it is to non-immigrants. However, in the case of immigrants the significance of employment is accentuated by the nature of the migration process. Most immigrants are motivated by economic considerations. The success of their move therefore is most likely to be assessed on the basis of economic factors, including the nature and income generating capacity of their employment. Bearing this in mind, along with the general emphasis on employment status, and remembering that most immigrants invest a considerable amount, both economically and psychologically, in migration, it is not surprising that non-recognition of qualifications and consequent drop in occupational status can have devastating effects on the individual.

19. It seems to be abundantly clear that many former immigrants to Australia have not received recognition of their qualifications, have become discouraged or depressed, have as a result been less able to handle some of their responsibilities and, generally, have endured and sometimes been the cause of considerable suffering. Employment is a key aspect of immigrant settlement and, for those with qualifications, recognition plays a key role in that process.
Contribution of Bicultural Professionals

20. Many immigrants and many involved in the helping professions have highlighted the importance of immigrants having access to members of the professions, and particularly of the helping professions, who speak their language and understand their culture. Within some ethnic groups, reasonable numbers of bicultural, or at least bilingual, professionals have emerged over the years. Within others, however, and particularly within the more recently arrived ethnic groups, the numbers of such professionals are very small. Moreover, the evidence suggests that a reasonable proportion of such ethnic groups do seek out bilingual professionals, even when the costs of doing so are considerable.

21. While the need for bicultural professionals should be recognised at the migrant intake level, it is also relevant to the question of recognition of qualifications. It appears to the Committee that the need for such persons is so great that it constitutes a major argument for the development of adequate recognition procedures. Indeed the Committee considers that it may well be necessary to go further than this and to designate specific ethnic groups at particular points of time as groups for whom positive discrimination may be warranted. In suggesting this the Committee is not implying that qualified persons from certain ethnic groups should be accredited on the basis of inferior standards. The Committee believes that the creation of second-class professionals or of second-class services to meet an existing need is neither feasible nor desirable. However, it may well be that professionals from certain cultural backgrounds should be given some additional assistance to enable them to achieve recognition and so become available to serve their communities.

SOME IMPORTANT UNDERLYING PRINCIPLES AND DILEMMAS IN THE DEVELOPMENT OF RECOGNITION PROCEDURES

22. As already suggested, there are strong arguments which can be mounted in justification for the development of adequate recognition procedures. At the same time, however, the Committee appreciates that to bring about such a development is not an easy or straightforward matter. There appear to exist some important principles which should, if acceptable, be acknowledged and endorsed. There are also some underlying dilemmas which really need to be resolved before we can proceed to a discussion of the details of any recognition procedure. Let us therefore examine some of these principles and dilemmas.
Principles of Equity

23. The Committee is of the opinion that there are some important principles by which any assessment mechanism may be judged for fairness and equity and it is important to note them here. Without attempting to establish priorities or to discuss their interrelationships the principles are:

(a) Any mechanism must be:

universally applied;
efficient in reaching a decision;
open and clear;
internally consistent;
reasonable; and
flexible.

(b) The assessment standard must be a reasonable approximation of the community norm.

(c) Performance tests of occupational competence must be fair.

(d) The conduct of performance tests must match community norms.

(e) There should be some form of appeal and impartial review of decisions.

(f) There should be public accountability for the body administering the system.

If these principles are acceptable, then it is important that both current and future assessment procedures be judged against them, and this the report will do at various points.

Choice and Protection of Standards

24. A characteristic of all trades and professions is that they develop standards and take steps to protect those standards. It is, therefore, to be expected that the various trade and professional bodies in Australia will possess standards and seek to ensure that they are not lowered by the admission of those possessing overseas qualifications not commensurate with Australian standards. The Committee accepts, as did many of the submissions, the importance of the maintenance of Australian standards in terms of minimum levels of skill for entry to occupations. It is recognised that many occupations in Australia have established high standards of practice, and that these standards are frequently in the best interests of public health and safety as well as providing a high standard of service.

25. Having acknowledged this, however, it seems important that, when establishing standards by which to assess
overseas-acquired skills and qualifications, care be taken to ensure that different practices and training are not automatically assumed to be inferior to what is familiar Australian practice. There is some evidence, for example in the area of trade qualifications, to suggest that much overseas training, though different from Australian, is nevertheless of sufficient quality to allow the flexible individual to adapt his skills reasonably easily to practice in the Australian context. This belief is a foundation for recommendations throughout the report on reorientation and retraining courses and programs.

Bases of Assessment in Recognition Procedures

26. The Committee is aware that in a number of occupations the basic training is the only qualification which is considered when an applicant is assessed for admission to 'the right to practise'. This means that both postgraduate qualifications and experience are ignored in this context. A number of individuals have submitted to the Committee that this constitutes an injustice with the potential for discrimination against applicants from those countries whose basic qualification is perceived by outside professional associations and others as inadequate. The Committee found examples of such occupations within both the professions and trades.

27. The Committee is aware that in certain occupations (such as medicine) it is a statutory requirement that only the basic qualification be considered for registration. In others such as professional engineering an applicant's higher degree and practical experience can be taken into account in the assessment process. As a general principle the Committee believes there should be sufficient flexibility in recognition systems for the merits of an individual's entire training and experience to be taken into consideration so that procedural barriers are not set up which act to disadvantage the individual, or which result in the loss to Australian society of skills which would otherwise prove of advantage to it.

28. A further problem highlighted from time to time during the Inquiry was that some immigrants to Australia possess qualifications relating to areas of specialisation not delineated as such in Australia. This may be due to the division of a known occupation into two or more sub-groupings or it may represent a new development not yet incorporated into Australian systems. Whatever the reason, the current inability to assess a qualification unknown in Australia should be open to appeal on the part of the applicant and to review, where appropriate, by the relevant bodies.

Participation of Immigrants in Recognition Procedures

29. The Committee considers it to be an important principle that all bodies entrusted with the various aspects of recognition of persons with overseas qualifications draw upon
the experience of former immigrants. To this end it regards it as important that care be taken to ensure the representation on these bodies of former immigrants, particularly of those deriving from a non-English speaking and/or a non-Anglo Celtic origin. It is helpful if those selected as representatives also possess experience of the situation under examination. The sensitivity which such people can possess regarding the experiences of immigrants with overseas qualifications, together with their first and second hand knowledge of the precise operation of existing procedures, can be of very great value to bodies entrusted with responsibilities in this field.

Place of Reciprocity

30. The Committee is aware that in certain trades and professions automatic recognition is given to persons possessing qualifications from certain nominated countries. It appreciates that this can be, and often is, perceived as discrimination. Moreover, such a procedure implies a degree of uniformity among both training institutions and their graduates that is unlikely to exist in any country. In justifying this practice, however, some with whom the Committee consulted emphasised the importance of Australian graduates receiving experience abroad, and suggested that this would not be possible without reciprocity with countries like the United Kingdom. Others emphasised the importance of historic ties and of the close ties existing with New Zealand.

31. While recognising that there are arguments both for and against reciprocity, the Committee believes that Australia should move towards a system whereby, in this matter, all countries would be treated on an equal basis. It is contrary to the growing emphasis on non-discrimination generally that the graduates of specific countries be singled out for special treatment on any basis other than merit. Moreover the Committee has noted that some other countries are reducing reciprocity arrangements.

Case for Positive Discrimination

32. It has already been suggested that the need of certain ethnic groups for professional services and the serious shortage of bicultural professionals available to them may warrant a degree of positive discrimination. Such a system would ensure that the overseas-qualified of nominated professions within nominated ethnic groups would be given priority for selection into appropriate bridging courses. These individuals would be required to meet appropriate standards in the same way as any other applicant but would, within the category of acceptable applicants, be given preferential treatment.

33. The Committee is aware that positive discrimination practices can represent a two-edged sword. While it may be the best or only way to meet a need, it can easily be a source of
resentment among those who are not so favoured and so perhaps aggravate an ethnic group's problems by intensifying prejudice against it. For this reason the Committee would favour systems of equal treatment as the general rule while accepting that a positive discrimination approach might at times be necessary.

Application of Australian Standard Procedures

34. Among the procedures providing for recognition of overseas qualifications there are many for which parallels exist within other Australian systems. These include examination regulations which control the number of attempts permitted, procedures determining the extent of information available on the coverage of the examination, the availability of appeal systems open to students, and the opportunities for unsuccessful students to discuss their performance with staff in a manner useful for orienting them for a further attempt.

35. All of these procedures used for the assessment of the overseas-qualified have their parallels in established Australian training and assessment processes. It is the Committee's view that, as a general principle, the standard procedures which are common practice in comparable situations within Australia should be applied to assessment procedures for the overseas-qualified. Presumably the procedures which have evolved and are applied generally within Australia are based upon accepted principles which are as applicable to the overseas-qualified as to anyone else. In practice, therefore, the degree of divergence between assessment procedures should be marginal.

SIGNIFICANT ASPECTS OF RECOGNITION PROCEDURES

36. The crux of the Committee's deliberations and consultations concerned the many aspects of the overall recognition process. The process was examined both in general terms and in the context of selected trades and professions. As a result of this work the Committee has identified a number of important aspects of that process, and these are reviewed briefly in the following sections.

Provision of English Classes

37. The ability to practise the majority of trades and professions in Australia requires a degree of fluency in the English language. In many cases accreditation and the right to practise are available only to those with adequate English. In almost all cases opportunities for further study and development are dependent on a degree of fluency in English and certainly the public expectation is that those who practise the trades and professions will speak English. Clearly, however, the different trades and professions call for differing degrees of fluency.
38. The information available to the Committee highlighted frequently the importance of a knowledge of English for recognition purposes. Many immigrants obviously found it extremely difficult to master English to the extent required, despite the availability of and their attendance at English classes. Some complained that the standards of English required and/or examined for in the various occupations were inappropriate. Some complained that positions were not available to them in appropriate advanced English courses, or that they required a course specifically geared to the English required for practice in their trade or profession that was not available.

39. The Committee concluded that in several areas the prevailing situation was inadequate. It was considered important that all trades and professions should determine the level of English required in their field and examine applicants at that level. Then, to enable would-be applicants to reach the requisite level, a comprehensive system of basic English courses, advanced English courses and courses of English for special purposes needed to be made available.

Availability of Counselling Services

40. A further prerequisite for an adequate assessment system is the availability to the immigrant of information and counselling services. Information needs to be available on the assessment procedures and on opportunities for preparation for assessment such as bridging courses. Where an immigrant has several available options, or does not qualify for the assessment procedures, or undertakes the assessment procedure without success, then counselling will be frequently required. It is also possible that an applicant for assessment may require assistance in the form of advocacy or representations made on his behalf, and this also should be available.

41. The information presented to the Committee suggests that many immigrants are not receiving either adequate information or counselling and that such services are urgently required. Ideally the information and counselling should be available at least at one central point in each State, as has already occurred in at least New South Wales and South Australia.

Importance of Translation and Interpreting Services

42. The recognition process is frequently dependent on the translation of documents setting out in detail academic or trade qualifications and training and work and other experience. Also in the recognition process interpreters may be needed to assist at technical interviews or in trade tests or similar assessment procedures. It was submitted to the Committee that difficulties occasionally arise in having documents translated accurately due to the unfamiliarity of some translators with highly specialised professional and technical terms. The Committee acknowledges the importance of
adequate translation and interpreting services within the recognition process, both at the overseas post and within Australia. It may be necessary for the National Accreditation Authority for Translators and Interpreters to consider what might be done to improve the current situation.

**Accessibility to Assessment Procedures**

43. From the evidence submitted to it the Committee has become aware that the facilities available for counselling the overseas-qualified, for assessing their qualifications and for administering the accreditation procedures are not always as accessible to immigrants as they need to be. Frequently information and other assistance are available only from one central national office, often only by written enquiry. Written responses are not infrequently slow in coming, brief and limited in the information conveyed and, of course, highly impersonal, that is lacking in consideration of individual circumstances. This has often resulted in the bodies concerned being perceived as secretive and obstructive. The lack of clear lines of public accountability in some examining bodies has added to public disquiet.

44. The Committee believes that the whole process of recognition within every profession should be widely known, clearly understandable to applicants and fully accessible to all who need to make use of it. For this goal to be achieved it appears to the Committee that some structural changes are called for, and its views and recommendations on this matter are set out elsewhere in the report.

**Availability of Reorientation Courses**

45. Given that differences do exist between overseas and Australian training and work contexts, and that such differences do not necessarily imply that what exists in other countries is inferior or inadequate, the Committee considers that there are many occasions where a bridge is needed between overseas and Australian practice, so that the individual may adapt and apply his skills. However, it was clear to the Committee that very few such bridges have been formally established to date, although some valuable experiments have been undertaken. The Committee believes that the need for such courses should be explored within every occupation and, where their development or extension is called for, adequate steps taken to bring this about.

46. In addition to the need to expand the range of bridging courses available it is apparent also that the support available to individuals undertaking such training will need to be improved. At present many are excluded from unemployment benefit yet not eligible for student assistance because they already hold a qualification, albeit an unrecognised one.
47. The Committee is aware that difficulties could arise if the availability of such bridging courses is exclusively for immigrants. While some such courses may in practice be useful only to immigrants the Committee believes that, in principle, such courses should be available to all Australian residents on the basis of criteria established for each particular course.

Mechanics of Assessment Procedures

48. The Committee has found that assessment procedures currently used in Australia in the various trades and professions vary widely. In some situations the assessment is made of the training standards in each overseas country, with individuals accredited on the basis of possessing a qualification from an approved course in an approved country. In other situations assessment is based on the examination of the individual's abilities once basic eligibility has been established. In others again some combination of these two methods is utilised.

49. In those occupations where an examination approach is used, variation exists in the assistance given to candidates preparing for the examination, in the number of attempts permitted, in the extent to which fees are levied, in the feedback available to an unsuccessful applicant and on the appeal provisions available. In all cases, moreover, questions arise regarding the appropriateness of the actual examination, the extent to which it is regularly evaluated and even the conditions under which candidates are asked to take it.

50. While the Committee appreciates that a degree of variation is appropriate, given the differences between the various trades and professions, it is concerned about the situation presented. As already pointed out, some of the variation is on matters involving principle and this variation would seem to be inappropriate. In other areas the extent of criticism received by the Committee suggested that perhaps inadequate supervision or control existed over matters in which the public could expect that there would be some control or supervision. In relation to other matters again the Committee was concerned that procedures were not applied uniformly to applicants, but varied with area of origin.

51. It is the Committee's view that there is considerable room for improvement in the manner in which assessment procedures in certain occupations are both structured and applied. It therefore believes that there is an important role for a national body concerned exclusively with the development and oversight of assessment procedures and related facilities, and some of its recommendations are concerned with expanding the roles of such bodies.
Provision of Appeal Mechanisms

52. Several important developments in Australia in comparatively recent years have highlighted the growing acceptance of the principle of a right of appeal against decisions made by administrative bodies. It is consistent with such developments to find many submissions arguing strongly for an appeal system where decisions are made by a variety of bodies in relation to the recognition of qualifications. The Committee accepts that in general terms it is important that appeal procedures exist in order to avoid the impression or the reality that a profession is given or has assumed complete control over entry to its ranks on criteria decided and implemented exclusively by itself. Some suggested mechanisms for such an appeal system are dealt with elsewhere in this report. (See paras 35-40 Chapter 10)

Availability of Retraining as an Alternative to Recognition

53. Although recognition of a qualification gained overseas, by either paper assessment or examination, is likely to remain the predominant mode of entry to the professions by the overseas-qualified, it seems reasonable that other avenues should be available. One such avenue is the admission of overseas graduates to undergraduate or postgraduate courses to enable them to obtain an Australian qualification. Currently the situation in relation to this alternative is fairly complex. Some courses for undergraduates will not, by regulation, accept a graduate; some graduates who are accepted for such courses are not, as graduates, eligible for financial assistance; the granting of exemptions from certain parts of the course for a graduate appears to be far from uniform; and so on. In professions where competition for entry is considerable, it will be considered by some people as unacceptable that an overseas graduate should be given any advantage in competing against local applicants for entry, and this opinion needs to be respected. Despite the complexities and difficulties, the Committee is of the opinion that some provision in certain areas will need to be made for the admission of overseas-qualified professionals to local courses.

Costs of Achieving Recognition

54. The costs of achieving recognition of qualifications can be considerable. For the candidate, there are examination fees, which can be substantial, and often the need to learn English or attend reorientation courses at the minimal support level of unemployment benefit while faced with the heavy financial pressure of settling in a new country. These pressures can be even greater for the refugee, who usually arrives with little in the way of financial reserves. The costs to society of setting up adequate reorientation and retraining courses can also be high, and this is a burden that would normally be taken up directly by the States, and indirectly by the Commonwealth through its funding of
post-secondary and tertiary institutions. The Committee is also aware of the considerable costs borne by many professional and trade organisations which provide significant assistance to individuals and to government through making assessments for recognition purposes.

55. The Committee is of the view that facilitation of recognition for the immigrant is properly a government responsibility. The Commonwealth Government has responsibility for migration policy, migrant selection and pre-migration counselling, and immediate post-arrival settlement services. The State Governments have responsibility for regulated occupations and educational and welfare services. In view of the overlap of interest the Committee believes that the responsibility for facilitating recognition should be shared between the States and the Commonwealth. The Committee believes this responsibility encompasses a measure of financial support for individuals endeavouring to achieve recognition; funding for reorientation and retraining courses, and for translation and interpreting facilities; as well as logistic support in such areas as counselling and the development and conduct of adequate and equitable mechanisms for recognition. The Committee notes that Government policy in relation to the user pays principle could be applied in some circumstances. (See paras 25-27 Chapter 10)

SOME IMPORTANT STRUCTURAL ISSUES

Commonwealth and State Roles in Recognition

56. Recognition of qualifications for most regulated occupations is clearly a State power: State acts invariably govern all aspects of recognition for almost all occupations which for reason of public health or safety are closely regulated. However, the Committee notes that as a result of autonomous development of regulatory legislation there are frequently wide differences between States in their standards and methods used for assessment of overseas qualifications. This often gives rise to grave difficulties with portability of qualifications, where a person wishing to move interstate has difficulty carrying recognition with him. The labyrinth of different State requirements can cause considerable confusion to the immigrant unfamiliar with a federal system of government, as well as making overseas counselling onerous and more complicated and liable to error. Similarly, even where an occupation is not regulated, assessment of standards may be carried out by separate professional or trade associations in each State, giving rise to a similar lack of uniformity with consequent difficulties. The Committee notes the trend towards the greater regulation and licensing of occupations. (See Chapter 11) The Committee believes, however, that a more co-ordinated, cohesive national approach is a desirable long-term goal.
57. The Committee considers it should be possible for the States to act in concert and align their procedures, with the resultant benefit of simplified mechanisms which should enable speedier and more effective assessments. The assistance of Central Committees under the federal Tradesmen's Rights Regulation Act of 1946 and of the Committee on Overseas Professional Qualifications since 1969 has brought about a higher degree of national uniformity than otherwise would have been the case.

Role of Professional Associations

58. The Committee notes that the professional associations involve themselves in the recognition process to varying degrees. In the engineering profession, for instance, The Institution of Engineers, Australia, shoulders the entire burden of assessment, whereas in medicine the Australian Medical Association is one member of a 12-member body which has assessment responsibility.

59. The Committee sees considerable advantage in strong participation in assessment by the professional or trade body concerned because of their familiarity with occupational standards and their expertise in making judgements on levels of skills held. There are, however, some potential difficulties in the professional or trade association being the only body involved. It has to be recognised that the profession may have a vested interest in who or how many gain entry to the profession and its involvement may result in it being seen to be setting up a closed shop, protecting the established from competition.

60. Hence the Committee believes that, in principle, all assessment bodies should have representatives from interests other than the professional or trade organisations, including, ideally, qualified representatives from the population most affected, namely the ethnic groups with significant numbers experiencing difficulties in this field.

Portability of Qualifications between States

61. While most qualifications obtained in Australia are recognised in all States, overseas qualifications recognised in any one State may not necessarily be recognised in others. The Committee was made aware of the plight of a considerable number of earlier immigrants, whose professional qualifications were accepted under earlier State legislation for practice within that State only, but who are now unable to practise in other States. For these individuals the only existing pathway to a portable qualification is to successfully sit the current accreditation examinations. Many, however, because of age or many years of specialised practice, consider that they would be unable to complete this step.
62. The Committee considers this situation to be an unfortunate consequence of developments in this field and urges the relevant bodies to consider what action might overcome the problem.

CURRENT SITUATION AND THE NEED FOR CHANGE

63. From the evidence placed before it the Committee recognises both the complexity of the process of recognition of overseas qualifications and the often serious consequences of the inadequacies which have existed in this field to date. Despite the valuable work of the Committee on Overseas Professional Qualifications and its expert panels, of the various structures associated with the trades, and of a range of initiatives from individuals, organisations and institutions throughout society, developments in this field appear to have been hampered by inadequate planning and inadequate resources. As a result of these inadequacies many hundreds of immigrants, who might otherwise have gained recognition and contributed more fully to Australia's development, have been deprived of working at the level or in the field for which their training and experience have fitted them. This has often been a cause of great frustration and dissatisfaction for those involved, as well as a loss to this country.

64. This Committee is of the opinion that a number of changes are both necessary and possible. These changes, and the recommendations which should lead to them, are the subject matter of many of the chapters which follow.

65. In the Committee's view the total situation requires careful monitoring and appropriate co-ordination from formally established bodies. To this end it has recommended changes to the existing government structures in the professional and trade areas. It believes also that all assessment procedures need to be regularly evaluated against existing Australian standards, principles of equity and the realities of the prevailing situation. In those occupations which it examined closely it is suggesting some such changes, and it is recommending mechanisms to ensure evaluation both in the near future and in the longer term in all occupations. Finally, the Committee has been made aware of the importance of adequate access to all assessment procedures for all immigrants in Australia and potential immigrants overseas, and some of its recommendations concern improvements in information and counselling services and in access to assessment bodies.
CHAPTER 3

SCOPE OF THE PROBLEM

1. In accordance with its terms of reference, the Committee set out to delineate the scope of problems associated with the non-recognition of qualifications in Australia. Submissions to the Committee, reports on immigrant settlement experiences, case-load statistics of assessing bodies, case-histories of welfare agencies and official entry statistics all indicate the existence of a significant problem. However, available sources cannot provide exact figures, in terms either of overall size or of the number of problem cases in particular occupations. This chapter outlines the general dimensions of the situation, as far as they are ascertainable.

INTAKE OF QUALIFIED IMMIGRANTS

2. The number of immigrants admitted to Australia each year varies according to targets decided by the Commonwealth Government. Table 1 shows the immigrant intake for the past three years under the official immigrant categories. These categories retained broadly the same eligibility criteria for most of the period.

Table 1

<table>
<thead>
<tr>
<th>IMMIGRANT ARRIVALS BY CATEGORY : WORKERS AND DEPENDANTS</th>
<th>Numbers and percentage of intake</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Eligibility</td>
<td>24 116</td>
</tr>
<tr>
<td>Family Reunion</td>
<td>18 359</td>
</tr>
<tr>
<td>Refugees</td>
<td>19 953</td>
</tr>
<tr>
<td>Special Eligibility</td>
<td>18 843</td>
</tr>
<tr>
<td>Total</td>
<td>81 271</td>
</tr>
</tbody>
</table>

Source: DIEA

3. The composition of the immigrant intake can also be defined by the level of skills possessed by those intending to enter the workforce. Table 2 shows how the proportions of immigrants with skills have remained constant over the past three years.
Differing criteria for admission under the four immigrant categories (General Eligibility, Family Reunion, Refugees, Special Eligibility) have meant that some categories contain higher proportions of qualified workers than others. However, official figures do not indicate the full extent of skills possessed by immigrants within each category, but only those skills immigrants intend to utilise in Australia and are capable of performing. Tables 2 and 3 thus show the potential impact of immigrants on the Australian workforce in the short term, but cannot indicate the longer-term effects of people seeking to re-enter their former occupations some time after arrival in Australia. For example, women intending to take up home duties on arrival have not been counted in the workforce and, for statistical purposes, have all been classified by the same visa code (W353), irrespective of their qualifications or former occupations. Where immigrants intending to enter the workforce on arrival have held professional, technical or skilled worker qualifications that were not recognised in Australia, they have usually been classified at a lower level, for example semi-skilled, in these official entry statistics.

Table 2

<table>
<thead>
<tr>
<th>Level of Skill</th>
<th>1979-80</th>
<th>1980-81</th>
<th>1981-82</th>
</tr>
</thead>
<tbody>
<tr>
<td>Professional and Technical</td>
<td>6 133</td>
<td>8 662</td>
<td>9 685</td>
</tr>
<tr>
<td>Skilled</td>
<td>6 025</td>
<td>9 133</td>
<td>10 708</td>
</tr>
<tr>
<td>Clerical, Commercial and</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Administrative</td>
<td>4 383</td>
<td>6 923</td>
<td>7 199</td>
</tr>
<tr>
<td>Semi-skilled</td>
<td>8 894</td>
<td>13 591</td>
<td>13 926</td>
</tr>
<tr>
<td>Unskilled</td>
<td>7 301</td>
<td>9 578</td>
<td>7 446</td>
</tr>
<tr>
<td>Unstated</td>
<td>1 315</td>
<td>1 180</td>
<td>1 465</td>
</tr>
<tr>
<td><strong>Total</strong></td>
<td><strong>34 051</strong></td>
<td><strong>49 067</strong></td>
<td><strong>50 429</strong></td>
</tr>
</tbody>
</table>

Source: DIEA
### Table 3

**SKILLS OF WORKERS WITHIN IMMIGRANT CATEGORIES**

<table>
<thead>
<tr>
<th></th>
<th>GENERAL ELIGIBILITY</th>
<th>FAMILY REUNION</th>
<th>REFUGEES</th>
<th>SPECIAL ELIGIBILITY</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>%</td>
<td>%</td>
<td>%</td>
<td>%</td>
</tr>
<tr>
<td>Professional and Technical</td>
<td>79-80</td>
<td>29</td>
<td>16</td>
<td>2</td>
</tr>
<tr>
<td></td>
<td>80-81</td>
<td>24</td>
<td>15</td>
<td>2</td>
</tr>
<tr>
<td></td>
<td>81-82</td>
<td>26</td>
<td>15</td>
<td>2</td>
</tr>
<tr>
<td>Skilled</td>
<td>79-80</td>
<td>32</td>
<td>7</td>
<td>3</td>
</tr>
<tr>
<td></td>
<td>80-81</td>
<td>29</td>
<td>6</td>
<td>2</td>
</tr>
<tr>
<td></td>
<td>81-82</td>
<td>32</td>
<td>7</td>
<td>2</td>
</tr>
<tr>
<td>Clerical</td>
<td>79-80</td>
<td>15</td>
<td>19</td>
<td>4</td>
</tr>
<tr>
<td>Commercial and Admin.</td>
<td>80-81</td>
<td>18</td>
<td>19</td>
<td>2</td>
</tr>
<tr>
<td></td>
<td>81-82</td>
<td>17</td>
<td>21</td>
<td>2</td>
</tr>
<tr>
<td>Semi-skilled</td>
<td>79-80</td>
<td>19</td>
<td>27</td>
<td>33</td>
</tr>
<tr>
<td></td>
<td>80-81</td>
<td>25</td>
<td>33</td>
<td>30</td>
</tr>
<tr>
<td></td>
<td>81-82</td>
<td>21</td>
<td>36</td>
<td>38</td>
</tr>
<tr>
<td>Unskilled</td>
<td>79-80</td>
<td>3</td>
<td>25</td>
<td>52</td>
</tr>
<tr>
<td></td>
<td>80-81</td>
<td>3</td>
<td>23</td>
<td>58</td>
</tr>
<tr>
<td></td>
<td>81-82</td>
<td>3</td>
<td>17</td>
<td>47</td>
</tr>
<tr>
<td>Unstated</td>
<td>79-80</td>
<td>2</td>
<td>6</td>
<td>6</td>
</tr>
<tr>
<td></td>
<td>80-81</td>
<td>-</td>
<td>4</td>
<td>6</td>
</tr>
<tr>
<td></td>
<td>81-82</td>
<td>1</td>
<td>4</td>
<td>9</td>
</tr>
</tbody>
</table>

Source: DIEA

5. Available statistics do not show how many persons in particular occupations are admitted to Australia each year with qualifications that have not been recognised. Persons intending to enter the workforce and claiming to hold professional, technical or skilled qualifications that have not been recognised in Australia and who could not be correctly assigned to another occupational classification have been classified under semi-skilled code W276*. Table 4 shows a sizeable and increasing entry of persons classified as W276.

---

*W276 is technically reserved for applicants whose qualifications have been assessed unfavourably. Qualified persons who migrate before their qualifications are assessed are to be given the code of a less-skilled occupation. However, such persons have frequently been classified as W276 also.*
Table 4

<table>
<thead>
<tr>
<th>IMMIGRANTS WITH QUALIFICATIONS NOT RECOGNISED BEFORE ENTRY</th>
<th>Number of W276 cases by immigrant category</th>
</tr>
</thead>
<tbody>
<tr>
<td>General Eligibility</td>
<td>136</td>
</tr>
<tr>
<td>Family Reunion</td>
<td>160</td>
</tr>
<tr>
<td>Refugees</td>
<td>1221</td>
</tr>
<tr>
<td>Special Eligibility</td>
<td>Visas were not required by most persons in this category (for example N.Z. citizens) so occupational codes are not available.</td>
</tr>
</tbody>
</table>

Source: DIEA

6. Only in the General Eligibility category (now Labour Shortage and Business Migration category) is recognition of qualifications mandatory in the admission of occupationally qualified settlers. In other words, less than half the intake is required to obtain assessment of qualifications before acceptance for entry to Australia. Even in this category, important exceptions are made to this requirement, for example:

- where employment nominees hold qualifications that are non-registrable (that is there is no legal bar to practice) and the nominee acknowledges in writing that his qualifications may not be generally accepted in Australia; and

- where the spouse of a principal applicant (that is the person whose occupational eligibility decides the application) also holds qualifications.

Thirty three per cent of W276 visa holders in the General Eligibility category in Table 4 were qualified spouses or other dependants intending to enter the workforce.

7. In the other three immigrant categories (that is Family Reunion, Refugees; Special Eligibility) recognition of qualifications has not been a prerequisite for migrant entry, though prior recognition could enhance the applications of some qualified persons in the Family Reunion category. Family reunion migration, especially with the widening of eligibility criteria since April 1982, and continuing high levels of refugee admissions make it likely that appreciable numbers of qualified persons will continue to enter Australia without their qualifications being recognised.
8. The processing instructions of the Department of Immigration and Ethnic Affairs (DIEA) mention the desirability of an assessment of qualifications before travel to Australia, even though admission may not depend on a favourable assessment. However, assessments will often be feasible only if they can be carried out promptly; it would often be undesirable to hold up the movement of refugees for this purpose and other persons may be impatient to travel as soon as they can do so. The Committee on Overseas Professional Qualifications (COPQ) reported an average turnaround time with its assessments of six months*. If present delays in assessments are caused by an excess of applications over resources, then an increase in the number of referrals would lead to even longer delays unless additional resources were provided. Where applicants are assessed by means of a screening examination overseas (for example in medicine, physiotherapy, pharmacy) it is even more difficult to finalise assessments quickly. Examinations are conducted no more than twice per year and candidates must lodge their applications at least two months in advance. The assessment process also includes practical experience and/or clinical examinations in Australia, making it impossible to finalise the assessment without the applicant coming to Australia.

9. In forming its views on the scope of problems associated with the recognition of overseas qualifications in Australia, the Committee was handicapped by a lack of statistical data on the number of persons entering Australia with unrecognised qualifications in particular occupations. In devising measures that might be taken in respect of different occupational groups, it is important to know the approximate numbers of settlers who may encounter difficulties related to their qualifications. The Committee believes that the best opportunity to identify such persons is at the time they undertake entry procedures, based on the information that applicants are routinely required to provide in their application forms and at their interviews. Because of its central role in immigrant entry procedures and its interest in resolving post-arrival settlement difficulties, the Committee concluded that DIEA was the appropriate body to undertake the required data collection.

10. The Committee recommends that DIEA in order to provide a data base for action with regard to overseas qualifications, consider amendments to its statistical collection system to identify the number of settlers entering Australia and claiming to hold professional, technical or skilled qualifications that have not been recognised and the particular occupations in which they claim to be qualified.

(Recommendation 1)

11. Among persons now resident in Australia, a number of research reports and other survey material indicate an appreciable incidence of cases where settlers have been unable to re-enter the occupations in which they originally qualified overseas. The available evidence suggests that in some categories of the intake, the incidence of such cases may be as high as 60 per cent. However, generalised survey results of this kind run into problems of uncertainty about the meaning of 'recognition' and 'qualifications'. Overseas-qualified persons can encounter difficulty in a number of different ways in obtaining employment in their former occupations or at a level commensurate with their previous training, knowledge or experience. Not all these cases are attributable to an adverse assessment of formal qualifications. Although generalised surveys confirm the existence of problems with the integration of migrants into the Australian workforce, the Committee has been unable to establish clearly the extent to which these problems have been the result of adverse assessments of formal qualifications, and how much the result of other factors, such as problems with the English language, unfamiliarity with Australian practice or personal handicaps.

12. The difficulty of quantifying the overall extent of the problem is further complicated by differences in the importance of formal qualifications to gaining access to occupations in Australia. The Committee's research showed a wide range of situations: at one end of the range are occupations where lack of formal recognition means a complete prohibition, with legal sanctions, on practice; at the other, formal approval by an Australian assessing body has little or no relevance as to whether persons can resume their former occupations. In between, there are many variations. The former Commonwealth Department of Employment and Youth Affairs submitted to the Committee (368) that 'many people, migrants and Australian-born, are employed in their chosen occupations even though their qualifications are not formally recognised'. In some such cases, however, the Committee is aware that lack of appropriate recognition has been an obstacle to career prospects or has given rise to other disadvantages.

* This includes Census data on qualifications and occupations, the 1973 DIBE Survey 'A Decade of Migrant Settlement', the 1981 DIBE longitudinal survey of General Eligibility immigrants, sampling of DIBE Post-Arrival Services statistics, surveys of Indo-Chinese and East European refugee settlement and an Evaluation of the Community Refugee Settlement Scheme.
13. In individual occupations the Committee also found a lack of data on the number of persons having difficulties with their qualifications. Many different authorities and agencies carry out assessments of overseas qualifications for a variety of purposes, but few publish reports giving details of this activity. Where such reports are publicly available, figures for applicants already resident in Australia are often combined with those for persons still overseas and applying to migrate to Australia. This does not assist in defining the extent of problems within the Australian community and workforce. In other cases, statistics on applications for assessment of qualifications are based on overseas birthplace rather than overseas origin of qualifications; consequently, they do not show the number of overseas-born applicants whose training took place partly or wholly after arrival in Australia. Even a time-consuming examination of the files of assessment authorities fails to provide a complete answer, since they cannot show how many potential applicants do not make contact because of a lack of information about such services or because of discouragement about their prospects. For example, a Melbourne study (a) found that, out of 113 persons holding professional qualifications from Vietnam, only 58 had applied for recognition of their qualifications since arriving in Australia. Where figures are available on applications by immigrants to enter a particular occupation, definitional problems may obscure whether all such applicants are properly classified as members or former members of that occupation.

14. Bearing those difficulties in mind, the Committee has attempted to the best of its ability to estimate the number of cases involved in several occupations. (See Chapters 12, 13 and 14)

15. A paper (b) submitted to the Committee by DIEA stated that while post-War migrant intakes have always included comparatively small numbers of qualified persons with recognition problems, swelled by occasional groups of refugees, the situation now developing is unprecedented in that a high and continuing proportion of the intake consists of persons who will have difficulty in resuming their former skilled occupations. .... Some of the problem areas have been intractable of solution in the past and have resulted in serious settlement difficulties. If the number of such cases is now to increase and to receive substantial increments indefinitely from the migrant/refugee intake, it will pose a social problem of some magnitude.

---

(a) D.R. Cox, Professional Refugees in Australia, Department of Social Studies, University of Melbourne, May 1982.

(b) Overseas Qualifications in Australia, DIEA, January 1982.
While it is not in a position to comment definitively on future developments, the Committee is satisfied that the recognition of overseas qualifications in Australia is a serious problem for individual immigrants and, on the evidence available, that it is also a problem for Australian society.

16. The Committee notes the lack of machinery for the collection and publication of data on the incidence of recognition problems. As it was not in their terms of reference, assessment bodies have only reacted to applications for assessment and have not sought out, assembled or collated cumulative data on unsuccessful cases or on cases that have not been submitted to them. If the recognition of overseas qualifications is a social problem, it should be addressed in a systematic way, both in planning remedial action and in evaluating the effectiveness of action being taken. The Committee draws attention to the need for better machinery for defining the quantitative dimensions of the problem.

Qualitative aspects

17. The Committee received much personal testimony and other first-hand evidence regarding the serious personal and social costs of failure to gain recognition for overseas qualifications. This was supplemented by case studies and reports from governmental agencies in the welfare field. A high incidence of psychological problems was reported in cases of failure to achieve recognition of qualifications; at the least, a challenge to personal identity, a drop in self-esteem and feelings of loss of status appear to be common. Submissions also pointed to the cost savings to the Australian educational system represented by the entry to the Australian workforce of persons who received their education and occupational training elsewhere. The Committee accepts that the economic advantages of facilitating the re-entry of such persons to their former occupations are substantial, though it does not attempt to quantify, in monetary terms, such benefits. It believes, however, that the personal fulfilment and social benefits gained from enabling settlers to make use of their unused skills and qualifications are by themselves adequate justification for measures to facilitate their acceptance at an appropriate level into the Australian workforce.

18. The Committee also notes a lack of qualitative data, first, to understand the problems of people now resident in Australia who are seeking to re-enter their former occupations and second, to detect recurrent patterns of disadvantage. It sees a need for information to be gathered on people in this situation in order to gauge priorities for action and to devise programs that are sensitive to particular needs.

19. The Committee was informed that the ability of professional people trained overseas to practise in Australia was often important to fellow members of their ethnic groups.
A number of reasons was given for this, including the efficiency of bicultural and bilingual practitioners in dealing with persons lacking English, the need to have personal experience and understanding of cultural factors in occupations related to health and welfare and the boost to the self-image of ethnic groups to have their members in high-status occupations. It was argued that professional persons educated in Australia, even though reasonably bilingual, might not possess adequate cultural insights. The need for such professional people was said to be strongest among members of some of the more recently arrived ethnic groups.

20. The Committee believes these views to be soundly based but regrets the lack of empirical data that would substantiate positive action to facilitate services to groups disadvantaged by lack of professionally-qualified persons among their members. It welcomes measures such as a forthcoming survey, to be undertaken by the Commonwealth Department of Health on the recommendation of the Australian Institute of Multicultural Affairs, into the language skills of professionals in the health and welfare areas. As a supplement to the information to be derived from this survey, and as a basis for affirmative action recommended elsewhere in this report, the Committee sees a need for information on the extent to which immigrants utilise professionally-qualified persons from their own ethnic backgrounds.

21. The past 10 years have seen a growth in the number of occupations subject to registration or licensing controls and a consequent increase in regulatory boards. In the same period there has been a move away from listing acceptable overseas qualifications by country or training institution, especially in some professional occupations. The complexity of systems of recognition has increased with the introduction of re-qualifying procedures involving combinations of written examinations, service under supervision and oral tests. These examinations have also increased the opportunities for some persons holding unrecognised qualifications to qualify for re-entry to their occupations and for others with limitations on the portability of their qualifications to move interstate. Changes in the provision of English language instruction, and particularly of courses specially designed for persons wishing to re-enter their former occupations, promise to increase both the opportunities and the complexity of this area. There exists also a continuing need, sometimes associated with the formal recognition of qualifications but distinct from it, to fit newcomers into positions where their previous training and experience will be of maximum benefit to themselves and the workforce. The Committee notes with approval the expansion of services by State government agencies that provide information
and referral services and sometimes counselling and advocacy for persons holding overseas qualifications. The success of these services is evidence of previously unmet needs for expert assistance and advice at a decentralised level, not just with formal procedures for recognition but, more importantly to the applicant in some cases, on details of local rules and practices and on the availability of suitable English instruction.

CONCLUSIONS

22. At the present time, in view of lack of quantitative and qualitative information on the dimensions of the problems involved in the non-recognition of overseas qualifications, the Committee can make only preliminary judgments on those occupations where the greatest need for special action lies. However, the Committee has abundant evidence to arrive at the following conclusions:

(a) Appreciable numbers of overseas-qualified persons are resident in Australia and need assistance to re-enter their former occupations, given that this is usually their wish and in the best interests of all concerned.

(b) Additional numbers of such persons enter Australia every year and will continue to do so through refugee, family reunion and special eligibility categories and as dependants of settlers with acceptable qualifications.

(c) Qualifying procedures are complex and are not designed for persons trained under other educational systems, especially those in non-English speaking countries.

(d) Social and personal costs resulting from the non-recognition of qualifications are substantial.

(e) In some cases, ethnic groups are seriously disadvantaged in not having recourse to professional people with their own language and/or background.

(f) Collection of quantitative and qualitative information on recognition problems and on the needs of ethnic groups is limited at present.

(g) Advice to individual immigrants on their qualifications will be more useful if it is linked always with other information on requalifying courses, English tuition and Australian employment practice.
23. The Committee recommends that central agencies dealing with qualification problems maintain detailed statistics on caseloads, including factors such as:

(a) age and sex; period since qualifying; period since last practised;
(b) details of qualifications;
(c) period of residence in Australia and employment since arrival;
(d) ability in English;
(e) details of courses and other action undertaken to re-enter former occupations;
(f) other obstacles, apart from formal assessments, that prevent occupational re-entry; and
(g) approaches to assessment authorities; results of such approaches; applicants' comments on such approaches.

(Recommendation 2)
CHAPTER 4
MIGRATION POLICY AND ITS IMPLICATIONS

PROCEDURES OVERSEAS

1. Admission of immigrants to Australia is regulated by a number of factors. These include:

   - selection rules applicable to different categories of immigrant. (These are laid down in the Department of Immigration and Ethnic Affairs (DIEA) Migrant Entry Handbook for all categories of immigrants except refugees, whose selection is governed by the DIEA instruction 'Australian Guidelines for the Determination and Processing of Refugees');
   - annual intake targets determined by Cabinet, including targets for refugee admissions;
   - availability of Migration Officers overseas and other migrant processing services;
   - indices of unsatisfied demand for job skills in Australia as shown in the Occupational Demand Schedule; and
   - machinery for the assessment of overseas qualifications.

The Committee examined these rules and procedures to determine their effect on admission of immigrants with overseas qualifications.

2. Under procedures introduced in April 1982, Australia's migrant intake is divided into five different categories:

   - Family Migration
   - Labour Shortage and Business Migration
   - Independent Migration
   - Refugees and Special Humanitarian Programs
   - Special Eligibility

Each of these is divided into sub-categories. Though all immigrants must satisfy certain standards of health and character, other rules for admission to Australia are different for applicants in each category and sub-category.

3. Requirements for the prior assessment and recognition of qualifications differ between categories. These differences can be summarised as follows:
(a) Family Migration Category

Qualifications may be held by persons of working age sponsored by relatives in Australia. The main relevant sub-categories are:

- spouses
- parents of working age
- non-dependent children
- brothers and sisters

Assessment of qualifications is not mandatory although possession of recognised qualifications may be advantageous in the case of non-dependent children and brothers and sisters. In cases where pre-arranged employment is required, such employment does not have to be related directly to the applicant's previous work history.

(b) Labour Shortage and Business Migration Category

Sub-category: Occupations in demand

Assessment of qualifications is mandatory for principal applicants* whose eligibility in this sub-category depends on their having skills recognised in Australia.

Sub-category: Employment nominees

Assessment of qualifications is normally required, except where there are no registration, licensing or other prerequisites for entry to the occupation in Australia. In the latter case, the acceptance of nominees' qualifications by the nominating employer will be sufficient for assessment purposes as long as applicants sign a statement that they understand that acceptance generally in Australia cannot be assumed.

Sub-category: Business migration

Eligibility depends on the applicants' proven business skills and experience and the nature of the proposed enterprise in Australia, not on formal qualifications. Applicants likely to seek salaried employment in Australia are not eligible, nor are self-employed.

* In a family unit, the 'principal applicant' is the member who meets the eligibility criteria of the migration category under which the family is being considered. A principal applicant can also be an applicant without accompanying family.
persons who hold qualifications subject to occupational demand, such as doctors, tradesmen or consulting engineers.

(c) Independent Migration Category

Only a small number of applicants with outstanding characteristics are acceptable in this category. They must demonstrate a record of proven achievement and distinction, or else qualifications or expertise sufficient to ensure them employment.

(d) Refugees and Special Humanitarian Programs Category

Assessment of qualifications is not mandatory.

(e) Special Eligibility Category

The main sub-category is Trans-Tasman

Entry is not subject to overseas migrant selection procedures. Assessment of qualifications before entry is not usually feasible.

4. Assessment of qualifications before entry is thus mandatory only for principal applicants in the Labour Shortage category and carries minor relevance also for the small Independent Migration category. Dependents are not obliged to obtain assessments of qualifications in any category. An unfavourable assessment is not grounds for refusing a migrant application except where it has the effect of reducing an applicant's point score below pass level.

5. Under the regulations in the Migrant Entry Handbook, interviews overseas require a 'settlement assessment' to be made for all but a few applicants such as the spouses of Australian residents, aged parents and children. The Handbook explains that 'the purpose of the settlement assessment is to assess the capacity of the applicant and any family members to settle successfully'. If a rating of 'unsatisfactory' or 'serious settlement risk' is recorded the application must be refused, regardless of a favourable economic/employment assessment. Among factors to be considered under settlement assessment are:

- Evidence of preparedness for migration
  - whether the family has made enquiries about Australia

- Awareness of implications of migration
  - whether expectations are realistic
Ability to cope with the stress of migration
- whether likely problems have been anticipated.

Although recognition of qualifications is not listed as a factor to be taken into consideration, it would be open to an interviewing officer in reaching a settlement assessment to investigate the knowledge and expectations applicants may have about resuming their former occupations in Australia and their ability to cope with non-recognition of their qualifications. Non-recognition of qualifications may therefore be an indirect factor in the refusal of migrant applications on settlement grounds, although no information is available on the degree to which this occurs.

6. Refugee selection is covered by processing guidelines designed for the special circumstances of persons in that category and is not covered by the Migrant Entry Handbook. However, settlement factors are also taken into account in interviewing refugee applicants. It is understood that potential recognition difficulties have sometimes been a contributing factor in non-selection of refugees, although refugees are not automatically excluded from consideration for this reason.

7. The Migrant Entry Handbook points out that it is desirable for all applicants holding professional, technical or trade qualifications to have their qualifications assessed before entry to Australia. As already mentioned, however, this is mandatory only in a limited number of cases - covering less than half the migrant intake. Other persons would benefit from a prior assessment but, as the Handbook notes, 'for some occupations, assessment procedures are time-consuming and applicants for whom assessment is not essential [that is mandatory] may not want to delay migration by waiting for the outcome of an assessment'. The Handbook directs officers to warn such persons that they cannot be assured of recognition of their qualifications and to ask them to sign a statement that they understand and accept the situation.

8. The Committee is aware that migrant entry policy is built on a number of factors, including the social value of family reunion and humanitarian concerns for refugees, as well as manpower and economic reasons. It acknowledges that problems arising from the entry to Australia of persons with unrecognised qualifications should be viewed in the context of the wider social and national aims expressed in Australia's migration policies. The Committee does not see its role as making recommendations regarding entry policies themselves. Instead, it puts forward a number of measures to forestall or lessen some undesirable side-effects related to present requirements and procedures for the assessment and recognition of overseas qualifications.
9. Assessments of qualifications are carried out overseas in a number of ways, depending on the qualifications.

(a) In professional and technical occupations documents are sent by the overseas post to the Committee on Overseas Professional Qualifications (COPQ) in Canberra for assessments to be carried out. They are carried out by COPQ assessment staff, by COPQ expert panels or by referral to outside bodies such as professional associations.

(b) In professions where COPQ-sponsored examinations are available an eligible applicant may take a written examination at an Australian overseas mission. This examination procedure can normally be finalised only by a period of supervised practice and/or a practical test in Australia. Examinations are held only once or twice a year, and applications must be lodged more than two months in advance.

(c) The qualifications of persons in trades covered by the Tradesmen's Rights Regulation Act (TRRA) are normally assessed by a Technical Adviser at interview, sometimes supplemented by an on-the-job inspection or, rarely, a trade test. In the case of countries not served by a Technical Adviser documents can be forwarded for assessment through the Department of Employment and Industrial Relations (DEIR) to the Central Trades Committees.

(d) In skilled occupations where formal recognition of documentary qualifications is not an important factor in obtaining work in Australia, and in semi-skilled occupations, migration staff overseas assess applicants' qualifications against Australian systems of training in those occupations.

(e) Applicants sometimes approach Australian assessment authorities directly and, as a result, some provide overseas migration offices with evidence that their qualifications have already been accepted in Australia. Direct approaches are not favoured by DEIR, COPQ or the assessing bodies. (See para 22) However, direct action of this kind may sometimes be motivated by frustration at delays in the regular system of referral through official channels.

10. The Committee received evidence of some long delays in obtaining assessments of qualifications overseas. One result of this may be that qualified persons for whom assessment of qualifications is not mandatory will go ahead with their migration plans without waiting for an assessment. Delays have been partly the result of insufficient resources and heavy work-loads on available Technical Advisers overseas and on assessment bodies in Australia. The Committee believes that
some of these delays may be reduced by a review of procedures. For example, an overseas mission may not refer an applicant's qualifications to Australia for assessment until the applicant has been interviewed. This can compound the long time-lags already existing between lodgement of migration application and interview. The Committee understands that in many instances it is possible to ascertain from the documents themselves which applications possess a prima facie eligibility for migration. Where this is so, requests for assessment could be submitted to Australia prior to interview, thus utilising the long lead time between application and interview. This will have the added advantage that, when an assessment is returned from Australia in time, relevant counselling can be carried out at the interview.

11. Recognition of qualifications is not always a prerequisite for entry to an occupation. Some professional and technical occupations are free of formal bars to practice such as licensing, registration or the membership requirements of an association. Even where an occupation is registrable by law, it is sometimes possible to practise in a limited capacity without registration (for example in architecture). In some occupations (for example economics, biological science, drafting) decisions on a person's suitability for practice rest not with a regulatory body but with an employer or, in the case of self-employed people, with customers or clients.

12. Where there exist few official restrictions on practice, a formal assessment of a person's overseas qualifications will vary in its value. In some areas of employment (for example the public service) the assessment of qualifications by an expert body may be important in obtaining a position, while elsewhere in the same occupation a person's demonstrated knowledge and experience may be the deciding factors. In short, procedures for the formal assessment and recognition of qualifications have widely varying relevance, depending on the occupation concerned and sometimes on the intended area of employment. These differences are not well defined or documented.

13. In the case of principal applicants in the Labour Shortage category, DIEA instructions require virtually all professional and technical qualifications to be referred to COPQ for assessment. (The main exception to this rule is described in para. 16.) This instruction makes no distinction between occupations where recognition of qualifications is essential to practice in Australia and those where recognition or a formal assessment is less important. Since the whole area of qualifications is complex and the effect of non-recognition is not well documented, it may be advisable at present to err on the side of caution and to require an assessment of all qualifications. However, where formal recognition by a regulatory body is not a factor in entering an occupation, referral of qualifications to Australia would seem unnecessarily to delay an application and to add to the load of the central assessment body. If such occupations could be
identified and adequately described, overseas posts might well be competent to decide on comparability with Australian training in certain professional and technical occupations as they already do with skilled occupations outside the TRRA area.

14. Many of those who have had problems with their qualifications in Australia have been the spouses of immigrants whose own qualifications were acceptable. Others entered Australia under migrant categories (for example Family Reunion) that did not require them to hold acceptable qualifications. The Committee favours greater emphasis than is presently given to providing assessments of qualifications to such people before migration. It sees this as preferable to the signed statement mentioned in para. 7. Even if the assessment is unfavourable but they decide to go ahead with their migration, they will do so better informed and prepared for future problems. However, the Committee recognises the difficulty in asking such persons to submit their qualifications for assessment in cases where they are entitled to migrate anyway and:

- waiting for an assessment may delay their travel plans;
- recognition of qualifications is not essential to their resuming their occupation in Australia; and
- the assessment provided is uninformative about their employment prospects and how they can fit into their occupation in Australia.

15. The Committee recommends that DIBA review its administrative directions and procedures for the referral of qualifications from overseas posts for assessment in Australia. The review should seek out ways of cutting down referral time and should identify any professional or technical occupations where assessment of qualifications can be carried out at overseas posts.

(Recommendation 3)

16. The Committee noted that, in 1981, DIBA introduced scope for waiving assessment requirements for employment nominees in occupations that were not subject to registration, licensing or other formal prerequisites for entry. The Committee sees this as a possible step towards identifying additional instances where overseas posts may classify the occupations of migrant applicants without referral of their qualifications to Australia. However, the Committee considers it important to know whether those immigrants entering Australia as employment nominees and for whom recognition requirements are waived are in practice disadvantaged in the long term. Their initial employment is assured under this scheme but it is not known what happens later on.
17. The Committee recommends that DIEA study a sample of cases where recognition requirements have been waived for employment nominees. This should cover a spread of occupations and should endeavour to establish whether nominees have encountered significant disadvantages once they have left the employment of their original nominator. The results of this study should be taken into account in reviewing assessment procedures as recommended in para. 15.

(Recommendation 4)

18. The Committee pays tribute to the advances achieved by COPQ in the past ten years in providing examinations overseas as a means of testing the competence of migrant applicants in some professional fields. However, these examination systems have serious limitations where they require the overseas written examination to be followed by additional assessment procedures in Australia, and especially when these include a period of practical experience under Australian conditions. A major problem in this system is uncertainty about a candidate’s ability to complete the additional steps of the Australian component of the examination procedure. All migrant processing must be completed before going to Australia and the expense of travel and accommodation in Australia may have to be combined with a prolonged separation from family*, and all his without any certainty that the procedure will be completed successfully. Uncertainty may also be caused by changes in the classification of the occupation in the Occupational Demand Schedule or by difficulty in locating suitable positions in which to acquire practical experience in Australia. The Committee was informed of cases where applicants passed the initial overseas part of the assessment procedure but were unable to enter Australia to complete the remaining requirements because the demand situation for their occupation had changed in the interim or they were unable to find suitable positions in Australia. The limitations of this procedure particularly affect principal applicants in the Labour Shortage category. However, they also affect persons who are eligible for entry in other categories but who wish to establish their ability to resume their occupations in Australia before they take the step of migrating. The Committee registers its support, wherever possible, for endeavours to devise examination assessment procedures that can be taken wholly overseas.

* Persons whose migrant eligibility depends on the successful completion of assessment procedures in Australia are to be issued a temporary visa and to travel alone to Australia. Temporary visas are not to be issued to family members, even though they must have met immigration requirements. (Source: Migrant Entry Handbook)
19. Immigration posts overseas are under instruction to forward requests for assessment of qualifications only when applicants have a prima facie eligibility for migration. This also applies to requests to take overseas examination procedures. For principal applicants whose eligibility for migration rests on the acceptability of their qualifications (that is in the Labour Shortage category), this means that, before they can take the examination, their occupation must be classified as in 'shortage' or 'minor shortage' on the Occupational Demand Schedule or else an employment nomination must have been authorised for their entry to Australia*. DIEA instructions also limit the overseas examination procedure for medicine to candidates who have migration intentions and this limitation presumably applies to potential candidates for other examinations as well.

20. The Committee is aware of a view that any occupationally-qualified person overseas should be permitted to undertake assessment examination procedures, including the Australian component, without the restrictions mentioned in para. 19. This view is based on the essential difference between an assessment of qualifications and a decision on granting permanent residence. It has been argued that persons should be permitted to take the examination and establish their competence independently of immigration requirements.

21. Under present arrangements for the assessment of qualifications overseas, the Committee does not agree with the view described in para. 20. First, there is evidence that the examination system is overloaded; to allow persons to take examinations 'on spec' would unnecessarily add to that load. Second, candidates who were not entitled to migration but who undertook the additional procedures necessary in Australia would increase competition for facilities for practical experience (for example supervised hospital positions) that are already inadequate, and for which others have much stronger claims. Third, it should be realised that persons undertaking assessment examinations and often paying substantial fees to do so, have in general the goal of ultimately taking up residence and practice in Australia. Therefore, their eligibility in all other respects should have already been determined. Examination procedures overseas are administered by Australian Government officers — usually by the same officers who carry

* Employment nominations must be authorised by DIEA offices in Australia and will only be approved after adequate testing of the Australian labour market. In the case of medical practitioners, employment nominations must have the support of a State or Territory health authority. The only exception permitted is where it is considered that the doctor is qualified to provide a specialist service for ethnic communities.
out other immigration procedures. It is clear from submissions to the Committee that many applicants look on success in the overseas examination as in itself giving the applicant a strong claim to migrant entry. For these reasons, examinations and other assessment procedures conducted through overseas channels of the Australian Government should be undertaken only in relation to immigration requirements.

22. It follows from this point of view that advice from official assessment bodies to overseas applicants about their qualifications should not be provided without some reference to immigration requirements or procedures. It should not be possible for applicants to gain the impression that a favourable assessment of their qualifications gives automatic entitlement to entry to Australia for any purpose. At the least, assessments sent to overseas applicants should bear a disclaimer that the assessment or information provided does not in itself confer eligibility for immigration on the recipient and that further official requirements may need to be satisfied.

23. The Committee recommends that, as far as practicable and without infringing the objectivity of assessment bodies, advice provided to persons overseas regarding the recognition of their qualifications in Australia should clearly show the relevance of the advice to official immigration requirements.

(Recommendation 5)

24. Australia accepts refugees for humanitarian reasons. It can therefore be argued that the skills and qualifications possessed by refugees are irrelevant to overseas selection procedures. On the other hand, the balanced development of ethnic communities in Australia requires a reasonable mix of occupational skills within the intake. The status and self-image of an ethnic group are adversely affected by the absence of educated and qualified people among its members. Bicultural professionals can supply an essential quality of service to members of their groups. The Committee believes there is a strong case for including professional, technical and skilled workers in the refugee intake.

25. However, selection of refugees should not be made without due consideration of the problems they will encounter individually in Australia, including recognition problems. Qualified people who are unable to re-enter their former occupations are not in a position to provide their services to their group, the denial of their qualifications may be felt to reflect adversely on the group and they are themselves likely to suffer problems of adjustment to lower-status occupations. The Committee notes that DIEA guidelines for the selection of
Priority Three refugees (Others with resettlement potential)*
include consideration of whether an applicant
- has ability in the English language
- possesses skills or an employment background in demand in Australia.

The Committee favours the inclusion of an additional guideline for Priority Three refugees regarding their potential ability to resume their former occupations; judgments under this guideline would take into consideration facilities available in Australia for refugees to work towards re-entry to their former occupations.

26. The Committee recommends that, when selection is made of Priority Three refugees, interviewing officers give consideration among other factors to potential qualification problems and the availability of facilities in Australia to assist re-entry to former occupations.

(Recommendation 6)

27. The Committee accepts that it is often not practicable or desirable in refugee processing to delay selection procedures until assessments can be carried out. However, where time does allow, consideration should be given to undertaking occupational assessments for qualified refugees as a matter of priority. When such action is feasible it should be taken not just for refugees considered to have resettlement potential (Priority Three) but for all refugees with professional, technical or skilled qualifications. The aim of such assessments would be to give refugees a realistic idea of their prospects for resuming their occupations in Australia. They should, therefore, include information on all aspects of employment as well as the formal assessment of qualifications. The Committee elsewhere (Chapter 11) recommends the extension of trades testing overseas. It believes such testing should also be made available to refugee applicants where practicable.

28. The Committee recommends that, wherever feasible, occupational assessments be carried out for refugees overseas as a matter of priority.

(Recommendation 7)

29. Persons overseas who actively consider migration will make a number of contacts with Australian Government representatives: with locally-engaged staff, especially counter staff and interpreters; with DIEMA Migration Officers who will interview them and with whom they may have other

* The other two Priorities are Priority One (Presence of family in Australia) and Priority Two (Close ties with Australia).
contacts while their application is being processed; and in the case of persons with trade skills, especially TRRA trades, with Technical Advisers who are usually DEIR officers seconded to DIEA during their posting overseas. These points of contact provide a mechanism for information and advice about overseas qualifications. The Migrant Entry Handbook directs that migrant counselling overseas cover basic information needs, including how to have skills and qualifications recognised. At the present time, however, Handbook directions on counselling do not lay stress on problems arising from non-recognition or the advisability of assessments prior to entry and this should be rectified. The conditions in which counselling can be provided to refugees vary significantly depending on location. In some circumstances, it may not be possible for interviewing officers to provide adequate counselling. In other cases, however, delays in the movement of refugees from camps provide an opportunity for individual counselling and, in some cases, the assessment of qualifications. DIEA instructions for refugees lay down that:

Persons accepted for resettlement in Australia should be counselled to ensure they are aware of potential settlement problems. Areas to be covered should include employment prospects and the likely difficulties of obtaining recognition of any trade or professional qualifications ...

30. The Committee sees the contacts between the intending immigrant and the Australian migration office as the major means overseas of alleviating potential problems in Australia with qualifications. The Committee's principal recommendations regarding information and counselling are set out in Chapter 8. It also sees a need for all overseas staff having contact with intending immigrants to be reminded of the importance of prior assessment of qualifications, including the qualifications of persons outside the Labour Shortage category. However, action to urge persons already eligible for migration to have their qualifications assessed before travel assumes a system of speedy referral and an adequate information base available to counselling officers at overseas posts. This information would need to include details not only of those occupations where recognition is essential or highly desirable for practice in Australia, but also of those occupations where formal recognition is of only moderate or negligible importance. Without such information, assessment applications could be submitted unnecessarily with consequent confusion and delay for immigrants. The Committee recommends at para. 15 of Chapter 8 an improved information system along these lines.

73
PROCEDURES IN AUSTRALIA

31. Migration procedures overseas constitute a channel through which virtually all immigrants must pass* and in which information can be provided to all, both in standard form and in a manner tailored to individual needs. All procedures are under the control of the Commonwealth Department of Immigration and Ethnic Affairs. Once immigrants have arrived in Australia, however, no comprehensive coverage is possible by a single organisation and a network of government and private services has grown up to cater for the welfare and information needs of immigrants. These services are provided by Commonwealth, State and local government and by religious-based, ethnic-based and general community organisations. There is evidence of both overlap and gaps in these services.

32. Commonwealth migrant hostels provide accommodation for most refugees and for some other immigrants with occupations in demand. (In 1981-82, about 25,000 persons were accommodated in migrant hostels.) DIHA settlement and welfare staff and Commonwealth Employment Service (CES) officers are stationed at hostels to assist immigrants with problems of adjustment, including employment-related problems. Assistance includes identification of appropriate assessment authorities, translation of documents and enrolment at English courses.

33. Persons who have left migrant hostels, or who settled in the community immediately on arrival in Australia, may seek assistance with qualifications from a variety of other information agencies and outlets. These include DIHA offices, CES offices, Migrant Resource Centres, State government departments or commissions responsible for immigration and ethnic affairs, semi-government and private agencies. Not all of these can be expected to be expert in this complex subject, which necessitates familiarity with:

(a) professional, technical and trades' assessment bodies;
(b) local practices and conditions in particular occupations;
(c) availability of English courses, including specialised courses in occupational English;
(d) enrolment in regular qualifying courses;
(e) occupational qualifying examinations;
(f) on-the-job training;

* Exceptions are Trans-Tasman immigrants and persons who enter Australia on temporary visas and subsequently change their status to residents.
available positions for supervised practice; and

financial assistance while requalifying.

34. The Committee on Overseas Professional Qualifications, which has its headquarters in Canberra and reports to the Minister for Immigration and Ethnic Affairs, is staffed by DIEA officers and by additional assessment staff employed under contractual arrangements funded by COPQ. Its terms of reference and orientation are towards providing or facilitating formal assessments of formal qualifications and its staff is fully extended on this task. It has circulated to migrant information centres coupons on which immigrants are invited to submit details of their qualifications. On receiving the coupons, COPQ undertakes to

- invite the immigrant to send further information so that it can assess the qualifications; or
- provide the name and address of the assessing authority appropriate to the immigrant's particular case.

COPQ does not have staff outside Canberra and cannot normally provide a face-to-face advisory service or give advice about related matters associated with employment or retraining. No other Commonwealth agency or organisation has provided a comprehensive service on qualifications at the State level.

35. The record of the small and recently established Overseas Qualifications Unit of the Ethnic Affairs Commission of New South Wales which handled 802 referral, information or counselling cases of people with overseas qualifications in one year is evidence of the need for an identifiable, expert advisory service providing assistance on all aspects of integration of qualified immigrants in the Australian workforce. The Committee recommends the development of counselling services by such units in all States (Chapter 8, para. 35). They are well placed to provide a decentralised service and to do so in a face-to-face, personalised manner. They come within a governmental structure that also has authority for occupational registration and licensing and for many aspects of training. They would correspond at the local level with State representation on national assessment bodies that the Committee recommends elsewhere in this Report (Chapter 10, para. 72). The Committee expects that close liaison would be maintained between such units and COPQ, DEIR (Central Trades Committees, Local Trades Committees) and the proposed Trades Recognition Co-ordinating Committee. The assistance provided by these bodies to the NSW unit and the South Australian Ethnic Affairs Commission would be extended to other States as well.

36. The Committee does not envisage that State qualifications units would eliminate the need for other local sources of advice to migrants about their qualifications and
related occupational matters. For example, employment agencies will continue to play the major role in job placement. Other organisations will carry responsibility for adult English courses, including occupational English courses. However, since problems with overseas qualifications are frequently associated with a range of other adjustment problems, it is important that any comprehensive qualifications service maintains detailed knowledge of other organisations and services involved in the integration of immigrants in the Australian workforce. Similarly, the units would provide expert advice on procedures for assessments of qualifications to other agencies involved with immigrants. The Committee is convinced of a demonstrated need for a comprehensive advisory service on qualifications at the State level and that State Government agencies are in a good position to provide such a service.

37. The Committee recommends that a State qualifications unit be designated in each State as an appropriate focal point for dealing with overseas qualifications.

(Recommendation 8)

POLICY IMPLICATIONS

38. The Commonwealth Government has the constitutional responsibility for immigration and DIEA entry procedures for immigrants holding overseas qualifications are examined in the first part of this Chapter. The Commonwealth has also accepted a degree of responsibility for the settlement of immigrants after their arrival, notably through the system of migrant hostels and through post-arrival migrant services. These include the direct delivery of services by the Commonwealth, as with DIEA migrant services units in regional offices, and more indirect responsibilities, such as funding and co-ordination of adult migrant English programs. However, immigrants are members of the Australian community, and thus entitled for the most part to the same health, education and welfare services as other Australian residents. Consequently, other governmental and non-governmental agencies also become involved in problems such as the integration of immigrants at an appropriate level in the Australian workforce. There is no clear allocation of responsibilities in the area and this has resulted in differing approaches and emphases in the handling of individuals' recognition problems.

39. One important factor is State Government responsibility for occupational registration and licensing and for some aspects of training. While acknowledging the national dimensions of questions associated with qualifications, and especially the importance of Australia-wide recognition across State boundaries, the Committee believes that greater emphasis should be placed on the roles and responsibilities of State agencies in achieving a more equitable and functional system of dealing with overseas qualifications. This belief is reflected
in the Committee's recommendations for the membership of national assessment bodies and for identifiable focal points at the local level for dealing with the qualification problems of individual immigrants.

40. A rationale for welfare and other post-arrival services for migrants was enunciated in the 1978 Galbally Report(a) and recently confirmed by the Evaluation of Post-Arrival Programs and Services for migrants conducted by the Australian Institute of Multicultural Affairs(b). The Galbally Report set out four 'guiding principles' which were subsequently endorsed by the Government. Relevant to this Inquiry are the following:

- all members of our society must have equal opportunity to realise their full potential and must have equal access to programs and services;
- needs of immigrants should, in general, be met by programs and services available to the whole community, but special services and programs are necessary at present to ensure equality of access and provision; and
- ... self-help should be encouraged as much as possible with a view to helping immigrants to become self-reliant quickly.

41. Applying these principles to the situation of immigrants with recognition problems, the question can be raised as to how far such immigrants have 'equal opportunity to realise their full potential'. In the Australian society of which they have become members, immigrants whose former qualifications are not recognised seek to requalify in their occupations, just as persons born or brought up in Australia seek to obtain qualifications. The difference is that the latter can follow a clearly defined method of qualifying through regular courses of study and training, and generally do so at a stage of life and under conditions where they are being supported by family or other established networks. Immigrants with unrecognised qualifications are atypical members of the community in that they seek to gain entry to their former occupations without regular or convenient methods of preparation. In fact, legal obstacles sometimes obstruct such preparation; one example is the lack of provisional registration for the purpose of gaining practical experience in some professions. A fundamental difference between many immigrants with unrecognised qualifications

(a) Review of Post-Arrival Programs and Services for Migrants (F.E. Galbally, Chairman) Migrant Services and Programs, Report and Appendixes, AGPS, Canberra, 1978.

(b) Australian Institute of Multicultural Affairs, Evaluation of Post-Arrival Programs and Services, AIMA, May 1982.
qualifications and students qualifying initially in Australia is that immigrants may have to requalify in an unfamiliar language or working environment. Moreover, a large proportion have family responsibilities that place an additional burden on them.

42. The atypical nature of the immigrants' situation is reflected in the limited, uneven and unco-ordinated financial assistance available to them while seeking to requalify in their former occupations. Existing systems of financial support for training and retraining have been designed with the needs of the regular student or qualified person in mind, and are not suited to a person who has already qualified overseas and is now seeking to qualify for the first time in Australia. In some cases, educational assistance programs such as the Tertiary Education Assistance Scheme (TEAS) and the Adult Secondary Education Assistance Scheme (ASEAS) actively discriminate against immigrants who obtain entry to regular courses of study. (This is chiefly in cases where the immigrant is obliged, because of educational background or level of admission to a course, to study at a level equivalent to one he had previously undertaken overseas.) The administrative rules for TEAS eligibility also disqualify immigrants seeking to prepare themselves for qualification examinations or tests through ad hoc courses of training or through taking elements of regular courses in which they are not officially enrolled. The Committee considers that the possibility of revising TEAS regulations be considered as a part of the review of immigrant student allowances proposed in para. 46 of Chapter 7.

43. Financial support for adult retraining, such as the General Training Assistance of DEIR, are intended as manpower schemes to fill demand gaps in the Australian labour force. They do not address the problems of immigrants seeking to requalify. The Committee was informed that the number of cases where support was provided to persons undertaking reorientation courses was negligible.

44. In accordance with the principle that the needs of immigrants should, in general, be met by programs and services available to the whole community, the Committee favours the use by immigrants of existing systems of financial support when seeking to qualify in Australia in their former occupations. However, the Committee observed that these systems were designed for persons born or educated in Australia and often did not fit the situation of immigrants. Indeed, in some cases, overseas-qualified persons were barred from existing schemes by, for example, the fact that they had already studied and qualified overseas, even though their qualifications were not recognised in Australia. The Committee recommends in Chapter 9 (para. 25) a study of existing arrangements to see if they can be extended to immigrants seeking by various regular and special courses to qualify in their former occupations. If this is not possible then special assistance needs to be introduced.
CHAPTER 5

SPECIAL SITUATION OF REFUGEES

1. The Committee's terms of reference required it to 'Consider the procedures for recognition of overseas qualifications and training, with a view to identifying' inter alia:

(c) special problems experienced by refugees which are of a different quality from those experienced by migrants in general.

SIGNIFICANT ASPECTS OF THE REFUGEE SITUATION

2. The Committee noted that refugees comprise a substantial proportion of the total immigrant intake, recently about 19 per cent. In addition it is frequently the case that significant numbers of refugees possess qualifications which, due to the circumstances of refugee movement, cannot generally be assessed prior to their departure for Australia. It is not therefore surprising that refugees were referred to in many of the submissions to the Committee and comprised a significant proportion of individuals present at the Committee's consultations.

3. The Committee refers in other chapters of this report to the needs of immigrants. However, the Committee's proposals for improved recognition procedures are intended to apply with equal force to the needs of refugees. Refugees are referred to separately where their needs have, in the Committee's view, acquired a significance out of the ordinary, and the ability of the recognition structures to meet expected demands has come into question. Examples of this are the proposals in Chapters 12 and 13 to reserve a small number of places for doctors and dentists from designated ethnic backgrounds such as Vietnam, on the supervised practice programs.

4. The Committee recognises that where a substantial number of immigrants not belonging to already established ethnic communities enter Australia they can be at a considerable disadvantage. It is, therefore, of the view that such groups should be assisted in a positive way with their establishment in Australia. Such arrivals lack the advantages of other newly-arrived who are members of older established ethnic communities with developed support networks and professionals of their own cultural background. While this is not a situation unique to refugees, it is perhaps more common amongst them.

5. The Committee believes that some special assistance is justified in these circumstances, including assistance in relation to recognition procedures. Such special assistance will be justified quite frequently for refugees but will at
times apply also to others. A number of submissions supported this viewpoint, for example, submission (289) from the Indo-China Refugee Association (Australia) stated:

The Indo-China Refugee Associations are keenly aware that these problems are found in varying degree among other migrants whose mother tongues are not English. We are particularly conscious of the problems facing displaced persons, like those from Lebanon, who are not refugees in the legal sense. We therefore believe it would be inappropriate to offer assistance for which only refugees in the legal sense would be eligible.

6. One particular characteristic of the refugee situation is that the refugee does not enjoy the luxury of freedom of choice insofar as a country of settlement is concerned. Return to his or her country of nationality is often out of the question, and resettlement in a new country with all its consequent difficulties is frequently the only available course. Yet a refugee may be offered settlement in very few countries and may be unable to link the final choice with an assurance that his qualifications will be recognised in that country.

7. Furthermore, in the refugee situation it must be borne in mind that many refugees, once resettled, are virtually obliged to remain in that country independent of what happens in relation to either recognition of their qualifications or securing employment. And if they cannot re-enter their former occupation, or acquire a reasonably comparable status, the impact upon them as involuntary migrants, which very many of them are, may be greater than for other immigrants.

8. The Committee concluded that, for the most part, the nature or quality of the recognition problems facing refugees is the same as for immigrants in general. Their situations do not differ in kind but there is considerable evidence that they differ in degree.

SIZE AND ORIGIN OF THE REFUGEE INTAKE

9. The Committee received information from the Department of Immigration and Ethnic Affairs (DIEA) which showed that since 1945 Australia has received some 400 000 refugees, principally of European origin. Since the end of the war in Vietnam in April 1975 Indo-Chinese refugees have become the largest single element of Australia's current refugee intake while refugees from Poland are currently the second largest group. Between 1975 and 1982 over 65 000 Indo-Chinese and 8000 Poles have been resettled in Australia. The refugee component of the total settler intake into Australia in 1981-82 of 118 700 was 21 917 or 19 per cent.
10. In his 1982 study, Cox(a) reviewed the available statistics relating to the occupational background of Indo-Chinese refugees. He found that since 1975 it was likely that refugee arrivals comprised 'somewhere between nine and fourteen per cent professionals, nine and fifteen per cent administrative and clerical, fifteen and eighteen per cent sales, and between twenty-eight and thirty-eight per cent in skilled occupations.' Because of Australian unfamiliarity with the experience, training and qualifications of the refugees he commented that the difficulty, 'is in assessing the degree of skill involved and in not knowing the precise nature of the qualification held'. He concluded '... a substantial proportion of the refugees entering the workforce have work experience of a skilled nature which may be capable of utilisation within the Australian workforce'.

11. A survey of East European refugees conducted for DIEA in 1981(b) by a marketing and research consultancy firm made the following findings. Of a sample of 198, most had been skilled tradesmen in their own countries (48 per cent) and a high proportion (23 per cent) had professional qualifications.

12. The Committee also noted the findings of another consultancy firm which conducted a survey of the settlement process of Indo-Chinese in Sydney in 1980(c). This survey and also that of the East Europeans found higher degrees of non-utilisation and under-utilisation of occupational skills for both groups than that normally experienced by immigrants.

13. The Committee noted that the above surveys in 1980 and 1981 also found high unemployment rates. The rates were 25 per cent (December 1980) in the case of Indo-Chinese and 20 per cent (October 1981) in the case of East Europeans. The unemployment rate for Australian-born workers in October 1981 was 5.8 per cent. To some degree these figures may have been accentuated by attendance at English classes.

(a) D.R. Cox, 'Professional Refugees in Australia, the Employment-Related Experiences in Australia of Professionally-Qualified Refugees from South East Asia', Department of Social Studies, University of Melbourne, 1982, p. 8.


The evidence available to the Committee from the surveys and also from submissions and consultations indicated that both Indo-Chinese and East European refugees are experiencing abnormally high levels of unemployment. While this may in part be due to a short period of residence in Australia it is clear that the problem goes beyond this and the Committee's general findings elsewhere in this report acquire particular significance in respect of the refugee intake.

The Committee, not surprisingly, found ample evidence that economic establishment is a major problem for large numbers of refugees. Many arrive with very few assets and face the prospect of having to purchase essential items to begin life in Australia. The difficulties they face are illustrated by the Indo-Chinese survey above which found that not only were the refugee incomes lower than others in the community but that high outgoings, for example money transfers overseas and hire purchase payments, were common. The Committee considered that its recommendations in respect of counselling, English language training and supervised practice for health professionals, to mention a few, will be of considerable benefit to refugees.

REFUGEE EXPERIENCES OF RECOGNITION PROCEDURES

16. DIEA in its submission (300) stated:

As a group, refugees are probably the most singularly disadvantaged; they have come from countries in which it has not been possible to obtain information to enable comparative assessments to be made, and flight from their homeland usually means that any documentation related to their qualifications is left behind. Further, the circumstances within which refugees are selected are such that assessment of their qualifications and suitable counselling are not possible.

17. The recognition difficulties referred to by DIEA were reflected in submissions and other information available to the Inquiry. The main problems mentioned by the Department are discussed below.

Information on training in refugees' countries of origin

18. The Committee noted that Australian training institutions and recognition bodies in general have very little information on the training arrangements and qualifications in many of the countries of origin of refugees. It also found that, in addition, there is a similar lack of information about a number of migrant source countries. The Committee is therefore of the view that COPQ in carrying out its amended terms of reference 1(a) and 1(b), shown at para. 48 of Chapter 10, on the collection and supply within Australia of information relating to overseas qualifications, should give
special attention to the needs of refugees and other migrant
groups where little is known about the training and
qualifications of their countries of origin.

**Loss of refugee documentation**

19. The claim was made in a number of submissions that
refugees are often at a disadvantage relative to immigrants
because in fleeing their country many are unable to bring with
them documentation of their qualifications and experience.

20. The study by Cox already referred to, found that in a
sample of 61 professionally qualified ethnic Vietnamese the
'remarkably high proportion of 88 per cent had with them in
Australia evidence of their qualifications'. On the other
hand, only 32 per cent of the sample could produce additional
documents detailing their work experience. In the event, Cox
observed '...there was little evidence that the possession of
either form of documentation made any significant difference to
what transpired in Australia'.

21. The Committee considered that any disadvantages that may
be experienced by refugees in producing documentary evidence of
overseas qualifications and work experience should be reduced
by the special measures adopted by recognition authorities in
this country. Statutory declarations, interviews and tests of
knowledge and practical proficiency are commonly used by
recognition authorities at all levels to substantiate claims by
refugees regarding their occupational credentials, skills and
experience.

22. The Committee recognised that refugees may spend time
attempting to obtain documents from their homeland, thereby
retarding their attempts at recognition in Australia. Others
may be unaware that recognition authorities have adopted the
above measures to assist them and may in consequence delay or
not attempt to gain recognition of their skills.

23. It also seemed to the Committee that those without
documentation would be subjected to more thorough investigation
by recognition authorities than would normally be the case. In
responding to these possibly more searching enquiries, refugees
without documentation may require higher levels of English
proficiency and demonstrated skill than other settlers would
normally require for recognition purposes.

24. The Committee is of the view that the most significant
disadvantage experienced by refugees without documentation is
the need to have spoken and written English skills sufficient
to describe the nature and status of their qualifications, and
the nature and depth of their experience. It concluded that
what appears to represent a major barrier to the recognition of
refugee skills need not in practice place refugees at any
significant disadvantage. Provided the measures which have
been adopted by recognition authorities are made known to refugees and the authorities do not conduct unreasonably rigorous investigations, the absence of documentary evidence should not notably disadvantage refugees compared with other settlers seeking recognition of their occupational skills.

Counselling

25. The Committee's recommendations on counselling in the refugee situation are shown at paras 29 to 30 of Chapter 8. The difficulties experienced by Immigration officers in providing counselling under refugee camp conditions are well documented elsewhere. It was clear to the Committee that these difficulties are often compounded, as in the immigrant interview situation, by a general lack of accurate and reliable information on the occupational recognition situation in Australia. The Committee concludes at Chapter 8 that the counselling needs of refugees do not differ from those of immigrants. It states that although refugees do not have as much choice of country of settlement as immigrants and may not therefore be able to select a country where their qualifications are recognised, it is still important that they be aware, prior to their departure for Australia, of any likely difficulties of gaining recognition of their qualifications. The Committee, therefore, believes that information on recognition and assessment procedures should be made available to both immigrants and refugees prior to departure. In this way, their expectations on arrival should be realistic.

English language training

26. The Committee noted the findings on the subject of English language training for professional refugees made in the study by Cox referred to above. Cox found that the sample of professionals which he surveyed had achieved little improvement in their English levels despite attendance at a range of English courses. He pointed out that his sample was comprised of graduates, most of whom speak two or more languages fluently, most of whom are in their 30's and very highly motivated to master English. Given such a set of circumstances, one would expect a fairly high success rate if the courses were appropriately designed.

27. The professional refugees in the sample were of the opinion that the existing courses did not meet their particular needs for training in the English required by professionals. These comments do not differ in kind from those made by many other overseas-qualified immigrants from all occupational backgrounds on the need for 'occupational English' or 'vocation specific' training.

28. The Committee is therefore of the view that while the English language training needs of refugees are clearly very considerable its recommendations for English language training set out in Chapter 7 apply equally to the needs of refugees.
CONCLUSIONS

29. The Committee is aware that:

(a) increasingly, refugees are originating from countries whose cultures and training systems are quite distinct from those prevailing in Australia;

(b) significant numbers of persons qualified in the professions or trades enter Australia as refugees;

(c) these persons seldom have access to pre-migration counselling on vocational prospects and, in any case, often have little or no choice of country of resettlement;

(d) these persons frequently arrive with very few assets and find economic establishment fairly difficult; and

(e) refugee ethnic groups are, in general, more likely than other immigrants to have no established community in Australia and to have greater economic needs at the time of arrival, yet at the same time to be comparatively short of appropriate professional services in their own languages.

30. For the above reasons the following general recommendations of the Committee are often of particular significance in the refugee context. These recommendations are that:

- various types of English, reorientation and retraining courses be available;

- financial assistance be available to trainees; and

- some training places be reserved for professionals coming from ethnic groups where the need for professionals of their own culture is considerable.

31. Because the Committee's general recommendations appear to meet the refugee situation and because the refugee intake cannot be treated as either homogeneous or completely distinct from other immigrants, the Committee does not favour the development of distinct provisions for qualified refugees on the basis solely of their being refugees.
CHAPTER 6

PATHS TO THE RECOGNITION OF OVERSEAS QUALIFICATIONS

ROLE OF QUALIFICATIONS IN EMPLOYMENT

1. Gaining entry to an occupation usually requires some proof of competency to undertake the work associated with that occupation.

2. The proof required may be in the form of documents gained from a training institution, references by previous employer or other evidence of experience, membership of trade or professional association, performance in an interview or in an on-the-job trial.

3. The degree and type of proof required varies among occupations or groups of occupations and in some cases among different grades of the same occupation, for example junior or senior engineers. Sometimes different employers will demand different degrees or types of proof and sometimes the capacity to furnish formal proof will be a determining factor in obtaining a job against competitors.

4. A further variable in the proof required is introduced by the federal system in Australia which gives responsibility for regulation of many occupations to State governments and their instrumentalities. Each of these may differ in their requirements for entry to occupations under their jurisdiction.

5. There is no complete list available of all proof requirements for each occupation in each State or Territory in Australia. People seeking such information may obtain advice through employment or welfare agencies, training institutions, or from the appropriate union or association.

6. The Department of Employment and Industrial Relations and the Australian Bureau of Statistics are jointly developing a system known as the Australian Standard Classification of Occupations (ASCO) which will provide information on the entry requirements for each of the occupations listed. The system will be computer based and will be updated at regular intervals. The development of such a system would be of further assistance to immigrants to Australia and to Australian Immigration Officers overseas who advise prospective immigrants of the entry conditions and the work involved in a particular occupation.

7. Summarised below are the types of qualification sought by employers and/or regulating authorities in Australia. For each type of qualification, examples of occupations to which they provide entry are given:
These categories are illustrative only and are not intended to be mutually exclusive, as in practice there may be some exchangeability or overlap of qualifications.

**OCCUPATION CONTROL**

8. The extent to which entry to an occupation is governed by possession of qualifications is determined by the degree of control exercised over the occupation, either by those within the profession or some external authority. The forms of control over occupations are summarised below:

(a) direct legal control - that is individual licensing of practitioners under Acts of Parliament

examples: doctors, dentists, some trades;

(b) indirect legal or judicial control - that is definitions of persons in certain occupations contained in legislation such as Trade Practices Acts, Industrial Awards, Medical Benefits Acts

examples: engineers, medical specialists;

(c) regulation by occupational peer group - that is membership of union or professional association required to practise occupation, entailing basic minimum qualifications for acceptance

examples: some trades and technical occupations.
9. In a number of other occupations where there are no clear controls over entry, for example computing, some employers may require certification whereas others are prepared to accept less formal proof of ability such as work history or performance at interview. Formal certification may however be required in such occupations to attain eligibility for membership of the association. This may hold important benefits for the individual such as access to information and other facilities which is particularly important in occupations involving rapid technological change.

10. Requirements for formal proof of education and training tend to be particularly stringent in academic spheres. People seeking to undertake further study or training in order to improve their employment prospects are generally required to produce proof of educational achievements at an appropriate level before being admitted to the course of study they wish to pursue.

STANDARDS

11. In academic as well as occupational areas, the generally accepted reason for establishing controls over entry is to maintain a minimum standard of performance on which the community can rely. Particularly where public health and safety are involved, legal controls protect the consumer by stipulating minimum standards required for practitioners of such occupations, for example nursing, medicine and plumbing.

12. Consumer protection is often the main reason why controls over occupations are introduced. In some cases public complaints induce governments to introduce certain controls to prevent malpractice (for example in public accountancy or panel beating).

13. The occupational group itself may seek the establishment of some formal control to prevent the entry of incompetent practitioners to the detriment of the consumer and the occupation itself. An example is provided by the Institute of Refrigeration and Air Conditioning Service Engineers of Western Australia Incorporated, whose submission to the Inquiry (68) points out that there is no restriction on any person, whether qualified or not, working in the trade and that this can have 'disastrous results'.

14. In general, the tendency in recent years has been for more licensing of occupations rather than less. Engineers are an exception to this, having resisted suggestions that they should be individually registered in Australia as they are in other comparable countries.

SETTING OF STANDARDS

15. Almost all occupational groups now have some body or structure responsible for establishing and monitoring standards
of practice. The process by which these standards are set, and
the key bodies in this process vary according to the degree and
the type of control exercised over the occupation, for example:

(a) regulated professions: standards agreed to by
professional group, practitioners, educationists, and
government authorities; control maintained by:
licensing body, legally
based, with representation
of profession, government,
educationists, and sometimes
related professions or
lawyers;

(b) licensed trades: standards agreed to by
unions, employers, and
government (sometimes
training authorities also);
standards maintained by
licensing body, legally
based, with representation
as above;

(c) unregulated professions
and sub-professions: standards set by
professional or
sub-professional
association, in consultation
with educationists;
standards maintained by
professional association,
sometimes with judicial or
other external control (for
example engineers as defined
by Industrial Award);

(d) unlicensed trades and
other occupations: standards set by market
place - sometimes endorsed
by occupational peer group
(union or association);
standards maintained by
training institutions under
aegis of education control
bodies (College Boards etc),
in accordance with market
demand.

16. The term 'standards' comprises a variety of elements,
some of which may not be easy to define or assess when applied
to individuals. The elements may include such factors as:
appropriate age
good character
ethical conduct
possession of appropriate mental and physical skills.

STANDARDS AND FORMAL QUALIFICATIONS

17. The possession of minimum educational or training achievement is very important in assessing an individual's ability to perform tasks associated with a particular occupation. Since there is a network of controls governing curriculum content and duration in academic and training institutions in Australia, and standardised examinations to assess student performance, those who successfully complete a course of study or training are assumed to have the appropriate level and type of skill required for a particular occupation.

18. Hence such qualifications are required by employers to avoid the necessity for individualised tests of ability for each job applicant. Formal qualifications may also be used as a basis for grading employees for salary purposes, or for decisions on promotions, or as a determinant for various privileges associated with status such as the right to work without supervision.

19. For these reasons most efforts have been focussed on equating qualifications gained from overseas education and training institutions with those obtainable in Australia. Most legislation or associated regulations governing the entry of practitioners to registrable or licensed occupations list those institutions whose qualifications are acceptable to the authoritative body. In some cases there has been no alternative method of qualifying for practice, for example veterinarians with qualifications other than those listed in the registration Acts have been required to undertake another complete course at an acceptable institution.

20. A number of individuals who submitted evidence to the Committee felt that this emphasis on the basic formal qualification was undesirable as it did not take account of experience or further training which may have been completed later. As one submission from an Engineer who had failed to gain recognition for his qualification pointed out:

I qualified as a Mechanical Engineer in 1958, which leads me to wonder how any feasible decision can be arrived at when comparing my qualification with those currently being obtained. (27)

21. Several submissions alleged that courses of study which had been undertaken in overseas countries were apparently similar to those in Australia, but had been deemed 'unacceptable' by the admitting authorities without
satisfactory explanation as to why, or which aspects of the qualification had been found to be inferior. These included an engineer (161), and accountant, (8) and a teacher (128).

22. Such difficulties reflect the more general problem of establishing equivalences between Australian and overseas qualifications. Nevertheless, there is often a need to establish such equivalences because they are important to the individual as well as to the various admitting authorities in occupations.

23. It would be impossible to provide accurate and up-to-date listings of all formal qualifications in Australia and their overseas equivalents, and the resources required to attempt this task would far exceed the benefits.

24. The task of comparing overseas qualifications with Australian ones would, however, be facilitated if Australian formal requirements were clearly defined and their relevance to the occupation for which they were required was ensured. One submission from a doctor in Victoria stated:

   It seems that the present system is based on historical and political precedents, rather than on academic standards and equivalences. (21)

25. Many submissions to the Inquiry argued for 'the maintenance of standards' but few described what standards applied or how they had been arrived at.

26. Bodies which require formal qualifications for entry to an occupation or occupation-related purposes should be able to give reasons for their requirements and explain to applicants with unacceptable overseas qualifications why those qualifications are inadequate.

ESTABLISHING AUSTRALIAN STANDARDS

27. There are several different ways that standards in education and training institutions are monitored, including general monitoring by bodies such as State accrediting authorities for advanced education, apprenticeship boards or industrial training commissions, university senates, and specific monitoring of vocational courses by various types of special interest groups, comprising representatives of professions, trades, employers and unions.

28. These standards are used to determine the entry requirements to occupations. However, because of the nature of the federal system, different entry requirements have often been established in each of the States and Territories of Australia.
29. In general, the standards set for the trades area are more clearly defined than those set for non-trade occupations. Machinery is more highly developed and attempts are being made through trade-specific task forces comprising representatives of all States and Territories to establish generally accepted training standards throughout Australia. These standards will be agreed to by representatives of government, employer and union groups, as well as educationists.

30. Such developments have important bearing on the issue of how overseas qualifications are assessed. If basic standards of course content and intensity can be assumed to be the same throughout Australia, overseas courses can be more easily compared. Immigrants can be told definitively whether they meet the necessary criteria, or what further training may be necessary.

31. However in professional, sub-professional and technical areas, it appears that little has been done to establish national standards. In many occupations it is not yet possible to obtain a definition of the tasks which comprise an occupation, let alone an identifiable and agreed standard of training and education.

32. Most of the work that has been done on this matter is a result of attempts by the Committee on Overseas Professional Qualifications (COPQ) to devise national testing methods for overseas practitioners of certain occupations. This has obliged custodians of standards in each state to re-examine their requirements, and to agree on a national test for entry in some 11 occupational areas. However, this has evidently not resolved all difficulties for overseas-qualified practitioners as is illustrated by the number of submissions received criticising the procedures in two of these occupations, that is more than 45 submissions in medicine and more than 14 in dentistry.

33. This attitude towards national tests could be partly due to the fact that the examination procedures provide a focus for criticism, but also because the actual standard involved and reasons for it are not clearly determined or stated for these occupations, although the procedures are stringent. Moreover, clear agreement has not yet been reached among all States and Territories on a fully portable national qualification. (See para. 77).

34. Several obstacles appear to exist in the way of achieving a precise and relevant set of national standards in the non-trade occupations. These include:

(a) basic differences in State legislation governing health and education matters, which also affect occupations in these fields;
(b) fragmented machinery for registration of professions, for example separate boards in each State and Territory, usually with no national co-ordinating body except where set up by COPQ;

(c) lack of appropriate accreditation machinery for vocational training courses, for example in medicine, the General Medical Council of the United Kingdom accredits courses in Australia, and in engineering basic degree courses are accredited by the Institution of Engineers, Australia, but no professional body accredits higher degree courses,

(d) the sheer volume of occupations and the rapidly changing nature of the skills and technology involved; and

(e) the historical adoption of requirements which may no longer be appropriate in a multicultural Australia.

35. Nevertheless, it would clearly be desirable for many reasons, of which the assessment of overseas qualifications is one, to achieve national agreement by all interested groups, that is professional and occupational groups, educationists, government and the community, on definitions and standards in all occupations. This need not necessarily introduce rigidity into the system, as core requirements only need to be defined with other aspects left to the individual training institution.

36. Detailed discussion on the benefits which could result from establishment of national standards and definitions of occupation are beyond the Committee's terms of reference. Suffice to point out that the exercise was considered to be worthwhile in the trades area, and has also been endorsed by the Consultative Committee of State and Territorial Law Admitting Authorities in Australia. An article published in the Australian Law Journal of July 1981, which the President of the W.A. Bar Association included with his submission to the Inquiry (94), contained the following quotation from Mr Herbert Mayo KC, which illustrates the point:

The necessity for a proper grade of skill and knowledge is of national concern. It is probably true to say that our professional status is never likely to be higher than that acquired by a person just, and only just, able to qualify. And the standard so set by him may be accepted by the public as the standard not only of the profession in his State but throughout the Commonwealth. If that be so it is a matter of concern to the community, and vital to the profession present and future, that an adequate minimum grade should be fixed for the whole country.
There can be no rational reason, nor, so far as I am aware, any climatic necessity, why the grade for qualifying, or the rule for admission, should vary throughout Australia.*

37. The setting of national standards would have obvious benefits in relation to the recognition of overseas qualifications, for instance the portability of qualifications in all States and Territories; the existence of an identifiable body with authority to judge standards; ease of comparison with overseas training courses; and assessment of what further training might need to be done.

38. Some useful work is presently being carried out by the team developing the ASCO system, mentioned in paragraph 6 above, in trying to achieve a consensus on the descriptions of over 3 000 occupations in Australia. This could form the basis for an examination of the current standards applying and credentials demanded, and of the bodies involved in setting and assessing such standards.

THE ASSESSMENT PROCESS

39. The majority of persons seeking jobs in Australia can provide proof of competency which is either recognisable or verifiable, that is a qualification gained at an Australian training institution or experience gained with an Australian employer. For the relatively small group of overseas-qualified people who offer proof which is neither easily recognisable nor verifiable, employers can take them on trust, accept assessments made by appropriate bodies, reject their qualifications, or require the applicants to complete further training or a specific examination in Australia.

40. The need to assess overseas qualifications has given rise to various bodies, mechanisms and processes which are not necessarily co-ordinated or similar. The systems identified by the Committee for determining the acceptability of overseas qualifications are described below, with examples of the occupational areas which typically adopt them:

(a) acceptance of all qualifications gained from courses accredited by the appropriate authority in a country to which reciprocal rights have been granted in Australia (usually the United Kingdom and New Zealand) (medicine, dentistry and others);

(b) acceptance of qualifications gained from specific courses in certain overseas countries based on first hand inspection or some secondary source of knowledge (physiotherapy, engineering);

(c) establishment of different criteria for each country, detailing level of training and experience deemed to be equivalent to Australian levels, through visits by Australian officials to training institutions in overseas countries (trades governed by the Tradesmen's Rights Regulation Act (TRRA));

(d) assessment on the basis of content and duration of course undertaken and/or experience gained by an individual, as attested to by possession of certified documents or references presented by an individual (engineering, academic);

(e) conduct of special written and clinical examinations designed to test individual competency (medicine, dentistry, physiotherapy);

(f) period of supervised practice and/or practical test for persons already in Australia (medicine, dentistry, physiotherapy);

(g) assessment by personal interview (engineering, banking); and

(h) acceptance of personal reference or reputation (medical specialists, academics).

41. Often several types of assessment procedure are used jointly, for example in medicine, dentistry, physiotherapy and engineering, which are described in more detail in later chapters.

42. The development of assessment techniques is usually a process which closely follows the development of the occupation itself. For example, occupational groups which do not have a strong identity or set requirements for entry, will usually rely on assessments carried out by academics, or may conduct their own assessments in a somewhat arbitrary style.

43. Once greater identity and legitimacy is established by demanding 'ethical and practical standards of members, the union or association of a particular occupational group may begin to develop its own capacity to assess overseas qualifications. Often the 'paper' assessment method is adopted at this stage.

44. If the occupation then becomes licensed or registrable, Acts of Parliament establish bodies which lay down certain entry requirements including the minimum qualifications acceptable for practitioners. These may vary among States and be assessed by each board independently, using a variety of methods.

45. The final step is to vest responsibility in a separate special purpose body for carrying out assessments of overseas qualifications, such as those established by COPQ or under the TRRA system.
While this development is typical, it may not always follow the same pattern. However, the tendency of occupational groups is to move towards greater control over entry (see para. 14). This often increases the difficulty experienced by the overseas-qualified in gaining entry to such occupations as although the requirements and procedures may be more clearly defined, they may also be more rigid and less accommodating to the needs of the individual.

EVALUATION OF ASSESSMENT METHODS

The acceptance of all accredited qualifications from some countries and rejection of all others from other countries (usually non-English speaking) tends to be characteristic of less highly developed occupational groups without resources to make more sophisticated assessments. However, paradoxically the practice of accepting all qualifications from the United Kingdom is still retained in professions such as medicine and dentistry, alongside highly sophisticated methods of testing individual competence. One reason given for this is the greater training opportunities which are available for Australian practitioners in countries with which there are reciprocal arrangements.

The disadvantages of this practice are that it is clearly discriminatory and takes no account of variations in study or training courses amongst institutions or variations in the competence of individuals. On the other hand it may be argued that the institutions and occupations in the United Kingdom are so similar to those in Australia that it would be wasteful to examine all qualifications separately.

The assessment method involving scrutiny of educational or training achievements gained overseas on the basis of information supplied by the individual is perhaps the one most widely practised by the less regulated occupational groups and by some academic institutions. Sometimes the information supplied on paper may be supplemented by consultation with people who have first-hand knowledge of the courses in the country in question.

The problems with this method of assessment include the difficulty of obtaining a full description of the scope, intensity and duration of the course of study or training undertaken; the fact that a paper description does not adequately reflect the quality of the course or the student's performance; the fact that attainment of a qualification, particularly some years previous, does not necessarily reflect present competence; and the difficulty of accurately translating technical or other terminology. Also, unless clear criteria are applied and the judgements are open to scrutiny, there may be subjectivity and discrimination even if this is unintentional.
51. Because the 'paper' assessment is a somewhat haphazard process, some organisations have adopted a policy of attempting to gain first-hand knowledge of conditions and training methods in other countries. This enables judgements to be made about the quality of the qualification held, although it still may not reveal the current competency of the individual.

52. The TRRA method of establishing criteria for certain countries is one that does take into account the amount and type of experience obtained by an individual after completion of the formal training course. However, the method is expensive and time consuming and information obtained about particular courses may be outdated very quickly. It also has elements of discrimination as individuals possessing qualifications from countries which have not been visited cannot be as easily assessed.

53. One advantage of this method of assessment is that it enables judgements to be made quickly if the information on the particular course is available in Australia and at overseas posts.

54. A number of submissions presented to the Committee suggested that a comprehensive information bank on overseas courses should be kept by an appropriate government body. To some extent, COPQ has tried to fulfil this role. Its members still travel to overseas countries on informal fact-finding missions and its secretariat carries out research on systems and courses. This work is necessary if COPQ is to act as an information resource and provide descriptive evaluations of qualifications for employers and occupational groups. However, most of the Expert Panels within COPQ have now moved towards the adoption of a system of testing individual competence by means of written examination, often supplemented by a practical test.

55. Several submissions from organisations and individuals stated a preference for the examination as being the most fair and objective of all methods of assessment. (For example, 5, 300, 371).

56. The examination system of assessment is seen as a 'superior technique' by COPQ, which has devoted considerable resources to developing it for 11 professions so far. COPQ in its submission to this Committee (371) stated that it was particularly useful in testing the skills of people with qualifications from unknown training schools.

57. Its main advantage as a technique is that it tests individual competence and does not rely on the reputation of overseas institutions. The Committee notes COPQ's suggestion that it can be successfully used for most 'science-based' professions or sub-professions (371).
58. However there are some disadvantages with the use of this method of assessment, some of which were pointed out by COPQ in its submission:

disadvantages .... are the complexity of developing examinations, the cost of maintaining and administering them, and the difficulty experienced in identifying an examination content and standard which protect the Australian community .... without raising insuperable barriers for the overseas trained. (371)

59. As a result of other submissions and its own research, the Committee identified some further difficulties with examinations. These included:

(a) an added difficulty for those of non-English speaking background as the tests are held in English;

(b) delays inherent in the system, as examinations are not usually offered more than twice a year;

(c) stress caused to candidates, especially those who are not familiar with the examination system used in Australia, or who completed their formal training many years previously;

(d) the high level of staff resources required to devise, administer and monitor examinations; and

(e) the stringency of some eligibility requirements.

60. Other forms of assessment which provide direct contact with the individual, such as interview or on-the-job trial, may be preferable for immigrants who would prefer a chance to prove their skills in a practical setting. The main difficulty with those methods is the logistical problems of providing a suitable setting especially for prospective immigrants at overseas posts. In Australia, provisional licences are not usually available for licensed professions or trades and this prevents the provision of on-the-job experience. There may also be an element of bias introduced by the personalities of the interviewers or supervisors.

61. Nevertheless, these methods were seen as useful by a large number of individuals and organisations who made submissions to the Committee. Business organisations especially seemed to rely much more on the personal interview as a method of assessing ability, than on checking the basic educational qualification.

62. Specialist bodies such as the Australian Medical Examining Council (AMEC) and the Australian Examining Council for Overseas Physiotherapists (AECOP) were emphatic about the
need to conduct a practical examination, and in AECOP's case, the desirability of becoming familiar with Australian conditions during a period of supervised practice.

63. As pointed out above, there are advantages and disadvantages with all methods of assessment. The Committee considers that no one method is universally applicable. A range of methods will have to be used according to the nature of the qualification held and the type of occupation in which it is to be used. Another important variable is the resources available to each occupational group.

64. These issues are considered further in the section on assessing bodies below, and in Chapters 11 to 16.

ASSESSING BODIES

65. The assessment of overseas qualifications is a task which is shared between numerous and diverse bodies, government, semi-government and non-government, academic and occupational. To a large extent these operate without co-ordination or public control although in some occupational areas, for example law and plumbing, the occupational group itself has established a special body to co-ordinate the assessment of overseas qualifications (the Consultative Committee of State and Territorial Law Admitting Authorities in Australia and the Australia New Zealand Reciprocity Association).

66. Some State or Commonwealth Government departments have direct responsibility for testing and licensing in certain occupational categories, for example hairdressing and transport occupations such as air pilots or marine personnel.

67. In general, however, the present system allows responsibility to diffuse between several bodies with a further dimension added by the practice of individual academic institutions or individual employers such as the Commonwealth Public Service applying their own standards.

68. An example of the convoluted process of assessment which can result from the involvement of a number of different bodies is provided by COPQ's description of the procedures adopted by its Expert Panel in Accountancy in its submission to the Committee of Inquiry (371):

Individuals already in Australia who approach the Committee are simply told to contact one of the professional bodies - The Australian Society of Accountants (ASA) and the Institute of Chartered Accountants or, at the para-professional level, the Institute of Affiliate Accountants. Sometimes these bodies write to COPQ and ask for information on the general academic standard represented by qualifications.
submitted to them by individuals and the Secretariat responds by drawing upon the Generalist Panel's knowledge.

The qualifications of prospective migrants who claim to be accountants which are passed to COPQ by overseas posts for assessment are sorted by the secretariat. If the qualifications would be regarded by the Generalist Panel as at degree or diploma level they are forwarded to the ASA with that comment appended and the ASA provides an assessment of the professional content. If the ASA indicates it would accept the person for membership, COPQ advises the embassy accordingly. Cases are not referred to the Institute of Chartered Accountants as it only accepts people who are already members of affiliated chartered bodies (371).

69. Some submissions from individuals specifically raised the issue of acceptance of their qualifications by academic institutions, when professional bodies or registration boards rejected them.

70. Many of the engineers whose basic degree is not acceptable to the Institution of Engineers, Australia, have likewise been informed that they can obtain graduate status to pursue postgraduate studies at academic institutions in Australia which are accredited by the Institution. (For example, submission 34).

71. An interesting example of anomalies which can arise within academic institutions is provided by a dentist whose degree obtained overseas was not acceptable to the registration board (35). She sought admission to an undergraduate course in order to be able to obtain an Australian degree but because of competition for places in the first year of the undergraduate course, she could not be accepted. At the same time she was told that if she wished to pursue postgraduate study (where competition for places was not as strong), her overseas degree would suffice to give her graduate status.

72. Bodies authorised to carry out the assessment of overseas qualifications should be as objective as possible in carrying out their task and wherever possible should have this function only.

73. Some assessing bodies have other responsibilities which may influence the manner in which they carry out the assessments. For example some have strong connections with trade unions or professional associations, licensing authorities and education and training authorities.

74. When the assessing body is also concerned with protection of the existing practitioners there can be a conflict of interests vis a vis the immigration of overseas-qualified persons who could threaten jobs and available
resources. This was suggested in a submission from a professor of the Faculty of Economics and Politics at Monash University:

A Committee that is established to pass judgement on the qualifications gained overseas by an individual is bound to rely heavily on 'experts'. These 'experts' are typically going to be drawn from members of existing professional or trade associations within Australia. It is inevitable that such experts will be biased against admitting overseas qualified people into their profession or trade. The bias need not be a result of malevolent intent. It is inevitable that such groups are going to view overseas qualifications from only the perspective of an Australian qualified individual which will prejudice them against the overseas-qualified. Moreover, it is generally in the interests of such professions or trade associations to limit, preferably eliminate, the amount of competition that their profession might suffer at the hands of entry by overseas professionals. (150)

75. The most highly developed assessing bodies are those established under COPQ, for example AMEC, AECOP, and the Expert Panels. These single purpose bodies have developed elaborate strategies and procedures for making sure current standards are maintained and all registration boards' requirements are met.

76. In the trades area the Central and Local Trades Committees have also evolved special expertise. Like the COPQ bodies they are publicly funded and can therefore apply more sophisticated assessment techniques to overseas-qualified tradespeople.

77. However, in spite of these co-ordinating mechanisms some anomalies still arise. The Committee's attention was drawn to the fact that overseas-qualified dentists wishing to practise in Queensland must satisfy the Head of the Department of Dentistry at the University of Queensland of their competence, even if they have already passed the COPQ examinations. Electricians who have been awarded a certificate of competency under the TRRA system, may be required to resubmit to further testing of basic proficiency by some State licensing authorities. (See Chapter 11). As indicated in the appropriate chapters, the Committee believes these anomalies can and should be resolved.

78. A major criticism contained in submissions concerning assessing bodies was their reticence about the procedures they adopt and the criteria adopted. Most bodies with ultimate responsibility for accepting or rejecting qualifications are either semi or fully autonomous and therefore have no obligation to be accountable to the public.

79. Even government bodies involved have been less than open on the methods they use and the criteria they apply. Several individuals enclosed copies of correspondence
with licensing authorities or registration boards showing that
in spite of detailed information provided by applicants and
requests for clarification, responses tended to be statements
of the rules rather than an explanation about the reasons for
rejection of the qualifications. (54, 140).

80. The need to provide information about assessment
procedures has been taken up in detail in Chapter 8, and in
relation to the particular occupational areas studied by the
Committee in Chapters 11 to 16.

ALTERNATIVE MECHANISMS

81. Some of the submissions to the Committee made
suggestions as to alternative mechanisms which could be
established to carry out assessments of overseas
qualifications. For example, reference was made by the Albury
Wodonga Development Corporation and the Victorian Ministry of
Transport (282 and 284) to the potential usefulness of
technical and further education colleges and technical
institutes in assessing skills and prescribing further training.

82. A submission from the former Department of Employment
and Youth Affairs (368) suggested a systematic
occupation-by-occupation approach to revising the current
processes. In all cases revision would involve establishment
of 'criteria' to ensure the overseas qualified person met the
existing requirements for entry to an occupation. The elements
of the suggested system include:

(a) full cognizance of existing Act, Board, licensing
bodies, unions and professional associations
relative to each occupation;

(b) where a qualification, license, or association
membership grants access to most or all of the
market for a registrable occupation, the
recognition process should be devoted to ensuring
that immigrants meet that 'criteria'; and

(c) the recognition process should make maximum use of
existing education and testing facilities and
vocational or semi-vocational courses.

83. One submission from a private company (379) suggested
that all attempts at overseas comparisons should be discarded
and a checklist of competency used to ensure people were
qualified to work in the shortest possible time. The checklist
might include knowledge of English as well as proficiency in
the discipline concerned, which might be checked by referees
and previous employers, or by a period of probation if
necessary.
84. Another concept frequently referred to in submissions was the type of tripartite structure which operates in the trades area, involving judgements made by representatives of government, the occupational group, employers, and possibly academics.

SUMMARY AND CONCLUSIONS

85. The Committee recognises that mechanisms for the assessment of overseas qualifications are necessary because people educated and trained outside Australia will need to provide proof of competence to employers or to other bodies with responsibility for the control of entry to and standards of practice within occupations.

86. The task of assessing overseas qualifications would be facilitated by a clear definition of the standards of practice applicable in each occupation provided by those responsible for controlling entry. It would be desirable for entry requirements and standards of practice to be established on a national basis so that approved qualifications are fully portable in all States and Territories.

87. There are several methods of assessment currently in use. These vary in sophistication and effectiveness, often according to the degree of development of the occupational group and the resources available to it. Although the Committee did not favour one particular method over another, it was clear from criticisms arising from the submissions that subjectivity and inconsistency of some current practices could be questioned. However, it is recognised that some of the more sophisticated techniques which provide greater objectivity are more expensive and may also be less flexible.

88. The Committee considers that much of the responsibility for improving assessment methods and procedures must lie with the assessing bodies themselves. There was considerable criticism contained in the submissions concerning the reluctance of existing bodies to provide information about the criteria and methods adopted and their apparent unwillingness to make flexible assessments based on all relevant data, including job experience.

89. The Committee believes that assessing bodies must be publicly accountable for their judgements. In addition to more willingness to disclose their procedures, they should also try to divorce their role in assessing qualifications from other functions which might influence such assessments such as immigration and manpower issues.
CHAPTER 7
RELEVANCE OF ENGLISH

INTRODUCTION

1. The Committee's terms of reference required it to investigate:

the relevance to admit to practice/licence/ registration of fluency in English...

2. While the Committee acknowledges the increasing importance to Australia of languages other than English, it agrees fully with the numerous submissions it received that English remains essential to recognition and employment in many professions and trades. It supports completely the primacy attached to English by the then Minister for Immigration and Ethnic Affairs in his address of August 1981 to the Applied Linguistics Association:

English is and will for the forseeable future continue to be the language of Australia. English is the language through which persons from different non-English speaking backgrounds can communicate with each other, as well as with English only speakers of the Australian Society. English language is probably the single most important factor in maintaining and reinforcing the cohesion of the Australian Society.

3. The Committee recognises the considerable difficulties faced by many immigrants in attaining the level of English proficiency necessary for employment. However, it sees the failure to learn adequate English as having serious consequences both for the immigrant and the nation. The effects of lowered personal self-esteem and income are multiplied many times at the national level through the failure to utilise hard-won skills and qualifications effectively. The Committee found ample evidence* of this in the numerous studies


of immigrant experience of recent years. Moreover, it believes there are serious gaps and deficiencies in the present arrangements for the teaching of English and considers that the provision of a more adequate program of English courses is essential.

4. The Committee is of the view that attempts to improve the English teaching situation must be given the highest priority. Without improvements in that area, improvements in procedures for the recognition of overseas qualifications are likely, for non-English speaking arrivals, to be of little avail.

5. In addition to improving the actual English program the Committee was made aware of the importance of making adequate financial allowances available to immigrants attending English classes. Without an adequate system of allowances it is probable that many who might otherwise attend and benefit from the language classes will not in practice attend them.

6. A further major need identified by the Committee and discussed in paras 25 to 31, is a requirement for a comprehensive and linguistically-based guide to the varying levels of English proficiency applicable in Australian occupations. The Committee is of the opinion that standards should be set which are in accord with acceptable English language practice across the range of Australian occupations. Further it considers that those who need to attain these levels should be given the opportunity to do so through the provision of adequate training arrangements. It supports the view expressed in a submission (45) from two Australian linguistics researchers:

There is no kindness for anyone involved (migrants, their future clients, schools or other employers, training institutions, etc.) in lowering standards (e.g. by ignoring realistic requirements for English proficiency and cultural understanding). However, to say that the English skills of overseas-born professionals should be indistinguishable from the


Australian-born is unrealistic, unnecessary, and could be considered, therefore, discriminatory. The solution is to make realistic requirements, to judge them validly and reliably, and to provide the means by which those requirements can be met.

SUBMISSIONS CONCERNING THE RELEVANCE OF ENGLISH

7. Almost 140, or nearly one third of the submissions to the Inquiry commented on the importance of English to the recognition of qualifications in Australia. Over 50 of the submissions were from professional and trades associations and registering and licensing bodies and these emphasised that English was seen as essential to their particular occupations. The occupations and submission numbers are listed in Table 1 below and range from professional and technical to skilled trades. The following reasons for the importance of English were typical of those given in the submissions:

- the need to communicate with the public and with colleagues;
- the importance of awareness of local expectations; and
- the need to have a knowledge of the legal background to various occupations - for example, State legislation relating to standards of public health and public safety.

8. Many of the submissions distinguished between the English taught to immigrants under the Adult Migrant Education Program and that spoken under conditions of employment. It was claimed that the available courses were too general in nature and did not constitute an adequate preparation for the English of employment which was described as being of a very specific and colloquial nature. A number of submissions both written and verbal, referred to a need for so-called 'occupational' or 'vocation specific' English. However, it was not always clear what this included nor was it indicated how such English could best be learned.

9. The Committee noted that one major submission, that of the Department of Employment and Industrial Relations (DEIR) (399), did not see English as essential for initial employment purposes at the trades level, but nevertheless agreed that it was desirable in the longer term and that appropriate English training should be provided. The submission stated:

Although lack of English is not generally a serious barrier to migrants seeking employment at trade level, it does cause some on-the-job problems and limits mobility and promotion. Consequently DEIR believes that there may be a need for increasing the provisions for occupationally oriented English classes for tradesmen.
Table 1

Occupations referred to in submissions as having an essential requirement for English

<table>
<thead>
<tr>
<th>Occupation</th>
<th>Code</th>
</tr>
</thead>
<tbody>
<tr>
<td>Air traffic controller</td>
<td>345</td>
</tr>
<tr>
<td>Accountant</td>
<td>(186, 229, 335, 413)</td>
</tr>
<tr>
<td>Bank employee</td>
<td>101</td>
</tr>
<tr>
<td>Boiler attendant</td>
<td>358</td>
</tr>
<tr>
<td>Builder</td>
<td>(32, 332)</td>
</tr>
<tr>
<td>Building inspector</td>
<td>348</td>
</tr>
<tr>
<td>Chemical industry employees</td>
<td>(258)</td>
</tr>
<tr>
<td>Chemist (industrial)</td>
<td>(177)</td>
</tr>
<tr>
<td>Chemist (pharmaceutical)</td>
<td>(200, 248, 219, 277)</td>
</tr>
<tr>
<td>Chiropractor</td>
<td>318</td>
</tr>
<tr>
<td>Company personnel</td>
<td>(119, 126)</td>
</tr>
<tr>
<td>Computer personnel</td>
<td>(283)</td>
</tr>
<tr>
<td>Crane operator</td>
<td>358</td>
</tr>
<tr>
<td>Deck officer</td>
<td>(345)</td>
</tr>
<tr>
<td>Dentist</td>
<td>(93)</td>
</tr>
<tr>
<td>Dietitian</td>
<td>(123, 213)</td>
</tr>
<tr>
<td>Diver</td>
<td>358</td>
</tr>
<tr>
<td>Electrician</td>
<td>(191, 194, 240)</td>
</tr>
<tr>
<td>Engine Driver</td>
<td>(358)</td>
</tr>
<tr>
<td>Engineer (aircraft maintenance)</td>
<td>(345)</td>
</tr>
<tr>
<td>Engineer (civil)</td>
<td>(344)</td>
</tr>
<tr>
<td>Engineer (unspecified)</td>
<td>(335, 375)</td>
</tr>
<tr>
<td>Engineer officer (ships)</td>
<td>(345)</td>
</tr>
<tr>
<td>Flight crew</td>
<td>(345)</td>
</tr>
<tr>
<td>Health surveyor</td>
<td>(348)</td>
</tr>
<tr>
<td>Horticulturalist</td>
<td>(376)</td>
</tr>
<tr>
<td>Lawyer</td>
<td>(100, 103)</td>
</tr>
<tr>
<td>L.P.G. conversion operator</td>
<td>(358)</td>
</tr>
<tr>
<td>Medical practitioner</td>
<td>(214, 281, 316, 324, 375, 403, 404, 405, 406, 415)</td>
</tr>
<tr>
<td>Mine Manager</td>
<td>(335)</td>
</tr>
<tr>
<td>Mining Industry (tradesmen)</td>
<td>(259)</td>
</tr>
<tr>
<td>Nurse</td>
<td>(185)</td>
</tr>
<tr>
<td>Occupational therapist</td>
<td>(202, 212, 311, 375)</td>
</tr>
<tr>
<td>Optician</td>
<td>(188)</td>
</tr>
<tr>
<td>Optometrist</td>
<td>(328)</td>
</tr>
<tr>
<td>Physiotherapist</td>
<td>(375, 386, 397)</td>
</tr>
<tr>
<td>Plumber</td>
<td>(108)</td>
</tr>
<tr>
<td>Printer</td>
<td>(125)</td>
</tr>
<tr>
<td>Professionals (unspecified)</td>
<td>(183, 270)</td>
</tr>
<tr>
<td>Psychiatrist</td>
<td>(373)</td>
</tr>
<tr>
<td>Psychologist</td>
<td>(349, 375)</td>
</tr>
<tr>
<td>Quality controller</td>
<td>(424)</td>
</tr>
<tr>
<td>Rigger</td>
<td>(358)</td>
</tr>
<tr>
<td>Scientist</td>
<td>(335)</td>
</tr>
<tr>
<td>Ships master</td>
<td>(345)</td>
</tr>
<tr>
<td>Speech pathologist</td>
<td>(173)</td>
</tr>
<tr>
<td>Surveyor</td>
<td>(87)</td>
</tr>
<tr>
<td>Teacher</td>
<td>(294, 323)</td>
</tr>
<tr>
<td>Tradesman, metal</td>
<td>(205)</td>
</tr>
<tr>
<td>Tradesman (unspecified)</td>
<td>(183, 270, 335)</td>
</tr>
<tr>
<td>Typist</td>
<td>(337)</td>
</tr>
<tr>
<td>Welder supervisor</td>
<td>(358)</td>
</tr>
<tr>
<td>Veterinarian</td>
<td>(366)</td>
</tr>
</tbody>
</table>

10. The Committee considers it significant that 21 organisations representative of immigrant and refugee interests also acknowledged the importance of English. Many referred to the highly specialised nature of 'occupational English' and agreed with DEIR that increased provision should be made to teach the English specific to the trades. However, a greater number saw a higher priority in the needs of the professionally-qualified from non-English speaking countries. Here a requirement for more advanced training in English was identified, possibly extending to the standards and procedures of Australian professional practice in the particular occupation.

11. The submissions to the Committee and consultations covered a wide range of immigrant experience. Many obviously found it extremely difficult to master English to the extent
required for recognition of their qualifications, despite the availability of and their attendance at English classes. Others complained that the standards required and/or examined for in the various occupations were inappropriate. Some complained that positions were not available to them in appropriate advanced English classes, or that they required a course specifically geared to the English required for practice in their trade or profession and this was not available.

12. The Committee as already mentioned, could find no systematic guidance as to the levels of English proficiency required in individual occupations. For example, the medical and dental legislation of the various States and Territories specify 'adequate English' as one of the requirements for registration, but give no guidance to the appropriate level of English for the practice of medicine or dentistry in Australia. In the trades area the situation is, in general, equally vague. Practical information on this subject for immigrant counselling or for the planning of specialised English courses is not available.

13. It is clear to the Committee that differing levels of fluency are required for effective performance in different occupations. The English required in the less skilled and more routine occupations is obviously not as complex as that needed for highly skilled occupations involving significant contact with the public and/or colleagues. It is the Committee's view that there is need for the development of a guide to the proficiency levels in all occupations supported by a comprehensive system of basic English courses, advanced English courses and courses on English for special purposes.

14. The criticisms made of the available English courses, that they were too general and so on, are consistent with both the opinions expressed by immigrants in surveys(a) and the reportedly high drop-out rates from some courses(b). Clearly there exist inadequacies in the program of English courses developed to date, despite the large expenditure of funds in this area. While the need for reform is apparent, the Committee found it difficult, on the evidence presented to it, to speculate on appropriate ways of rectifying the inadequacies in English teaching identified in submissions and at consultations. Moreover, the methodology for imparting this training is seen as the province of the language and vocational experts and some of the issues are canvassed under the methodology of 'occupational English' courses at paras 32 to 39.

(a) D.R. Cox, 'Professional Refugees in Australia, the Employment-Related Experiences in Australia of Professionally-Qualified Refugees from South East Asia', Department of Social Studies, University of Melbourne, 1982, p. 82.

(b) Galbally Report, pp. 43-44.
NEED FOR TRAINING IN 'OCCUPATIONAL ENGLISH'

15. Submission 208 from the Ethnic Communities' Council of NSW stated:

. The terminology in most professions and trades is usually complex and often, ... unique for the particular occupation...

. Many immigrants of non-English speaking background faced with the necessity to gain a recognition of their overseas qualifications in Australia find it extremely difficult to master the type of English applicable to their vocation. There are no provisions for vocation-specific English classes and the often conventional type courses become irrelevant when people attempt to translate mentally their professional knowledge into a second language: to teach concepts and terminology which is vocation-specific requires special skills, strategies and teacher attitudes.

16. Many other submissions pointed to the need for such courses. The Commonwealth Department of Education (398) commented that while:

a range of advanced and specific purpose part-time English courses has been developed ... a gap remains in the area of integrated specific-purpose English and bridging or conversion courses which offer an alternative means for an overseas qualified tradesman or professional to qualify for registration.

(the need for bridging or conversion that is, reorientation courses is dealt with in Chapter 9).

17. The Committee was informed that most English classes for immigrants are provided through the Adult Migrant Education Program of the Department of Immigration and Ethnic Affairs (DIEA). The very considerable resources allocated to the teaching of English under the Program and some indication of the overall need are provided by the following figures:

. in 1981-82 DIEA spent $32.2m (one third of its total budget of $96.7m) on the Adult Migrant Education Program

. from 1978-79 to 1981-82 some 380 000 immigrants arrived in Australia. About one quarter or 90 000 were estimated by DIEA to be adults with little or no English
estimates also made by DIEA point to some three quarters of a million adult residents of Australia having less than adequate English skills. However, it is noted that total enrolments in the Adult Migrant Education Program in 1980-81 were 123,713.

18. The Committee examined the range of courses available under the Adult Migrant Education Program and found that less than one per cent of the students enrolled could be said to be attending English courses linked directly to the recognition of particular occupations. The main courses of this nature identified were as follows:

(a) special intensive courses of 6 months duration for overseas-qualified professionals and sub-professionals (Recommendation 13 of the 1978 Report of the Review of Post-arrival Programs and Services for Migrants - the Galbally Report)

(b) special purpose English courses related to various occupations, at the Royal Melbourne Institute of Technology, for example:
   - Computer Programming
   - Nursing for State Registered Nurses and State Enrolled Nurses
   - Motor Mechanics
   - Fitting and Turning
   - Welding
   - Electrical Trades

19. It should be pointed out that the Adult Migrant Education Program has two main educational components. The first is the on-arrival program conducted by State Adult Migrant Education Services under arrangements with DIEA. On-arrival courses are aimed at the English language needs of new arrivals. They also include information about Australia, its institutions and services. The second is the on-going program which consists of a range of courses, including full and part-time ones designed in the main to teach general English from beginner to advanced levels. In 1980-81 there were as mentioned above, 123,713 adults enrolled in both phases of the program (on-arrival program 16,096, on-going program 107,617).

20. The Committee experienced some difficulty in determining the nature and location of English courses available throughout Australia both under the Adult Migrant Education Program and also through other bodies concerned with the teaching of
English. It considers that immigrants are likely to have even
greater difficulty in obtaining relevant information about
courses and determining which are the most appropriate to meet
their situation. While two States, New South Wales and
Victoria, prepare their own comprehensive guides, similar
information about other States did not come to the Committee's
notice. The Committee is of the view that a need exists for
State by State guides to English courses showing location,
degree of difficulty and other necessary information and for
that information to be made available to immigrants through
appropriate counselling centres. It would seem that the
provision of this information on a regular six monthly or
annual basis would be a considerable assistance both in the
counselling of immigrants and for the planning of English
courses.

21. The Committee therefore recommends that DIEA collect all
information relating to the availability and nature of English
courses and ensure that this information is disseminated to all
relevant bodies and to immigrants through the comprehensive
counselling service recommended in para. 35 of Chapter 8.

(Recommendation 9)

22. Following the Galbally Report, greatly increased funding
has been allocated to the Adult Migrant Education Program since
1978. However, the Committee found that with the considerable
growth in the immigration program over the last four years the
main emphasis in the teaching of English has been to service
the needs of the newly-arrived at the elementary to
intermediate levels of instruction. Under the circumstances
there has been little scope for experimentation with more
advanced courses. The major courses designed to teach the
English relevant to particular occupations on an Australia-wide
basis have been the special intensive courses for professionals
and sub-professionals to which reference has already been
made. The Committee noted that these courses were introduced
on a trial basis in 1978 and that DIEA has now decided,
following an evaluation of their effectiveness in April 1982,
to vacate specialist instruction of this nature. The
Department has recommended that in future such courses should
be offered by the post-secondary teaching institutions.

23. While it has proved difficult to quantify the need, the
Committee is of the opinion that a wide-spread suppressed
demand exists for training in 'occupational English', and it
considers that the 1200 applications received from
professionals and sub-professionals between 1978 and 1981 for
200 places on the Galbally Recommendation 13 courses is
indicative of the larger problem. The Committee is of the view
that if similar courses had been offered in the trades
occupations a far greater demand would have been in evidence.
24. The Committee believes that the teaching of English in Australia is at present in a transitional phase and that new priorities and directions are being identified. It considers that a convincing case now exists for the major bodies concerned with the teaching of English to consult with those with expertise in vocational training on the question of the teaching of English appropriate to individual occupations. The Committee believes that these bodies should be given the opportunity to jointly develop the underlying principles for this form of teaching and make recommendations for their implementation. The Committee's recommendation upon this is shown at para. 48.

MAJOR PROBLEMS WITH TRAINING IN 'OCCUPATIONAL ENGLISH'

Level of English appropriate to individual occupations

25. As already mentioned, it is the Committee's view that the levels of English proficiency required across the range of Australian occupations are highly variable. At the one extreme, in the case of certain unskilled occupations, it seemed to the Committee that minimal English only would suffice for reasonable operating efficiency. At the other extreme, for the highly skilled public contact professions, proficiency approaching that of a native speaker in the profession was seen as essential. It was noted that while almost 140 submissions to the Inquiry had commented on the importance of English, in one case only, that of teaching, was expert guidance given as to the level of proficiency applicable to a particular occupation (45). It has been noted that the wording of State legislation which specifies the need for English is of little help on the question of level as it is, in general, in vague terms such as 'adequate English'. The Committee considers that requirements phrased in this manner can be applied in a highly subjective way.

26. The submission from the Commonwealth Department of Education (398) commented:

Where English language competence is essential to occupational registration and/or employment in Australia, it is important that both the standard of English required is clearly identified and that the assessment of English language competence is objectively and professionally conducted. Generally speaking, across the range of occupational qualifications neither the identification of the standard of English required nor the objective assessment occurs and there appears to be a need for assistance to all registration bodies not just the professions now served by COPQ.

27. The Committee has noted the work of DEIR and the Australian Bureau of Statistics in developing an Australian
Standard Classification of Occupations (ASCO) which will provide detailed descriptions of all Australian occupations, including an indication of the level of English required.

28. The Committee is also aware that a technique for determining the English proficiency of individual students, the Australian Second Language Proficiency Ratings (ASLPR) has come into increasing use in recent years. It is understood that the ASLPR has undergone extensive testing and has achieved consistent results. It is also sometimes used for determining student entry levels to courses as well as measuring their proficiency upon exit from the courses.

29. While the State statutes of registering and licensing bodies do not define the appropriate level of English proficiency, the Committee noted that English examinations are nevertheless required of overseas-qualified candidates sitting some professional examinations, for example, the examinations conducted by the Australian Medical Examining Council (AMEC) and the Committee on Overseas Professional Qualifications (COPQ). The Committee was unable to determine the basis upon which such examinations were set and the level required. However, it noted that a number of submissions to the Inquiry had been critical of the situation. For example, one submission (444) discussing the AMEC English examination stated:

... we understand that the English component of the ... exam deals with what is described as 'general English' which is, in fact, somewhat literary and elitist in orientation and is far removed from the English one might encounter or use in the surgery or in contact with one's professional peers.

Not having access to the examination, the Committee is unable to comment on the criticisms contained in submissions.

30. COPQ has advised the Committee that the English examination they use in respect of the professional examinations which they administer differs from the AMEC examination and was developed by the Commonwealth Department of Education. COPQ believes that its examination can be improved upon and a new examination is now under development by a Committee set up for this purpose. The Commonwealth Department of Education is represented on the Committee. The new examination will reportedly contain testing elements which are specific to the particular professions being examined.

31. The Committee is of the view that while the level of English applicable to individual occupations is in general not defined by the professional and trades bodies in a way to guide applicants and course planners, the same bodies, with few exceptions, attach considerable importance to English fluency. The Committee therefore sees an urgent necessity for the English language requirements of individual occupations to be analysed and described in a way that will provide guidance to
both students and course planners. The Committee considers the work now being carried out on an Australian Standard Classification of Occupations (ASCO) and also the use of ASLPR may be of value in the preparation of a guide to the English language requirements of Australian occupations. It is also of the view that English testing for entry to the various professions and trades should be based upon accepted linguistic principles and that the level of the test should reflect the proficiency established as being appropriate.

Methodology of 'Occupational English' Courses

32. The Committee considered that the existing English courses for immigrants do not in general meet the specific requirements of those entering the workforce. While some courses have been offered in recent years, the most appropriate and cost-effective methodology to adopt, and the teaching authorities best equipped to do this, are still matters for some speculation.

33. It is the Committee's view that there is not, amongst the various teaching bodies, an agreed conceptual basis for the design and operation of 'occupational English' programs. In the case of the courses at the Royal Melbourne Institute of Technology referred to above, the instruction given is specific to the particular occupation, for example, 'English for Computer Programmers'. Yet information obtained by the Inquiry from the TAFE Board Victoria considered that 'occupational English' is best taught in non-specific terms. The Board considered that the courses should teach:

a particular specialised style of language ... within which (occupational) terminology might be interpreted. Such programs initiate and further the process of second language acquisition rather than the learning of technical terminology, which, in itself may not be easily applied in the workplace.

The Board pointed out that courses of this nature would enable teaching institutions to accommodate persons with diverse qualifications on a single course.

34. The structure adopted for the Galbally Recommendation 13 courses was described in the DIEA April 1982 evaluation of their effectiveness as follows:

- General Language Core - development of general and interpersonal language skills and cultural knowledge

English for special purposes - technical language, job situational language

Work experience.

35. The two major problems of methodology which the evaluation identified were:

(a) difficulties experienced by teachers in convincing students that language skills development would be best served by a 'communicative-interactive approach concentrating on small group work, role plays ...' Many students were accustomed to a more traditional classroom situation.

(b) in the work experience phase of the courses difficulties were encountered in arranging suitable placements. Quality of placements and experiences were said to be highly variable.

36. Submission (444) from two experienced teachers who have been responsible for the 'Ethnic Teachers Conversion Course' at the Victoria College and the special entry scheme to the Diploma in Education course for degree holders from non-English speaking countries at La Trobe University stated:

One conclusion that has clearly emerged from experience with E.S.P. courses is that they are complex and costly undertakings because they attempt something that most other English courses leave to chance, namely, to assist the learner to meet the authentic and specific language demands placed on him/her. Because language use always takes place in context and is affected by its context, these contexts require research and a flexibility on the part of the English teacher to respond to their variety and complexity. Moreover, E.S.P courses require the learner to genuinely engage in the authentic situations in which she/he needs to use English, so as to test out what has been learned in the classroom, and more importantly, to begin to research language use for him/herself.

37. Submission (45) from two researchers in the field of linguistics considered that the requirements for language and vocational training should be viewed separately. The authors, one of whom developed the Australian Second Language Proficiency Ratings (ASLPR), suggest a possible approach using as an example the teaching profession.

38. The approach suggested involves the assessment of the subject's English proficiency using the ASLPR. The ASLPR measures proficiency on a scale of 0-5 in respect of the 'macro skills': speaking, listening, reading, writing. Thus native proficiency would be shown as S=5, L=5, R=5, W=5. If the subject's degree of proficiency is already at a level judged to
be sufficiently high for teaching and his/her qualifications are acceptable then immediate registration as a teacher is recommended. If the subject has unacceptable professional qualifications then he/she is directed to a standard pre-service, up-grading or retraining program. For those with lesser degrees of proficiency, general English as a second language (ESL) and English for special purposes (ESP) courses are prescribed, leading, in the case of unacceptable professional qualifications, to a standard pre-service program for teaching. The total approach is shown below at Table 2.

39. The Committee noted the recommendation of the recent Australian Institute of Multicultural Affairs (AIMA) evaluation of the Galbally report that responsibility for the Recommendation 13 special intensive courses should pass to the TAFE institutions. The Committee believes that the TAFE institutions may well have an important role to play in the provision of 'occupational English' courses. However, it considers that it is premature at this stage to allocate responsibility for the courses until the overall teaching needs and problems of course provision have been defined. In any case there appears to be so much to be done in the teaching of 'advanced' English for those wishing to achieve recognition in the professional, sub-professional and technical areas that the resources of universities and colleges of advanced education may well need to be used, perhaps in conjunction with other reorientation programs.
<table>
<thead>
<tr>
<th>English Proficiency</th>
<th>Acceptable Professional Qualifications</th>
<th>Unacceptable Professional Qualifications</th>
</tr>
</thead>
<tbody>
<tr>
<td>S-4, L-4, R-4, W-3 and above</td>
<td>Immediate Registration</td>
<td>Directed to a relevant pre-service up-grading or re-training program</td>
</tr>
<tr>
<td>S-2+, L-3, R-3,</td>
<td>ESP course (for teaching purposes)</td>
<td>Directed to a relevant pre-service up-grading or re-training program</td>
</tr>
<tr>
<td>S/L/R/W 2 to 2+ and above</td>
<td>Registered when S-3+, L-3+, R-3+, W-3</td>
<td>ESP course for academic and teaching purposes. Relevant professional course when at least S-2+, L-3, R-3, W-3</td>
</tr>
<tr>
<td>S/L/R/W 2 and below</td>
<td>General ESL course plus ESP course when at least S/L/R/W 2 to 2+</td>
<td>General ESL course plus ESP course for academic and teaching purposes plus relevant professional course when at least S-2+, L-3, R-3, W-3</td>
</tr>
</tbody>
</table>

Source: Submission 45, Dr E. Burke and Dr D.E. Ingram, Brisbane College of Advanced Education.
CONCLUSIONS

40. The Committee was constantly reminded in many different ways of the critical importance of mastery of the English language. For those many immigrants coming from a non-English speaking background this was the cornerstone for achieving recognition of their qualifications and advancement in their careers, just as it was for many other aspects of their settlement. To the Committee it was evident that without a satisfactory English language program no improvements in recognition procedures would assist the non-English speaking category of immigrants.

41. The Committee was also aware that a range of English language courses was necessary, permitting a progression from the point of no knowledge at all to that of competency to practise in one's chosen occupation. In other words, a range of elementary, intermediate and advanced English courses was called for, to be taken in conjunction with English for special purposes and leading on to appropriate vocational courses. However, for such a system to work it must be possible for students to proceed logically through the courses. This necessitates a facility to both assess the students' existing degree of proficiency and to know the proficiency levels that students will require for entry into their chosen occupations.

42. The Committee believes that an essential ingredient of all English language programs is that the teaching be directed towards a definite objective. Without such an objective the learning process can become pointless and misdirected. Clearly, to identify the program which any individuals or groups of individuals need to follow requires resources, but the Committee considers such a facility essential if funds for advanced English training are to be effectively utilised.

43. An important aspect of identifying definite objectives is the delineation of English standards required in each occupation. At present the standards which applicants must attain and for which they are examined are in the majority of occupations left undefined. This places both students and those devising English language programs in an impossible position.

44. The Committee therefore recommends that COPQ co-operate with the DEIR and other relevant bodies to initiate a program through which each professional and trade body will be assisted to develop a detailed description of the English language proficiency required by each occupation under their charter.

(Recommendation 10)

45. The establishment of relevant standards of English required by the various categories of immigrants should enable improvements to be made in the overall English program. It is important that an appropriate balance be maintained between
the various types of courses, that the courses are fully accessible to those who will benefit from them, that applicants are counselled and an appropriate language development strategy devised with them, and that every care be taken to ensure that each course is designed to achieve specific objectives for immigrants with designated levels of proficiency. The Committee appreciates the enormity of the task but maintains that the importance of English and the size of the current budget warrant such an approach.

46. The Committee therefore recommends that DIEA carry out a review of its Adult Migrant Education Program aimed at defining clearly the levels and objectives of all courses and the relationship between them, and the resources necessary to achieve the objectives, and that it regularly monitors the program to ensure that at all times it relates closely to identified needs for English language training. In addition DIEA should review the existing provision of student allowances available to immigrants attending English language classes.

(Recommendation 11)

47. The Committee considers that 'occupational English' should be an important component part of any English language program. However, it concluded that considerable consultation and development is needed before the demand for 'occupational English' can be met in a way which both caters for those requiring instruction and utilises teaching resources efficiently and cost-effectively. It recognises that it does not itself possess the necessary expertise or have before it the detailed information to carry out an investigation of this nature.

48. The Committee therefore recommends that an expert working group of teaching and vocational training professionals be set up to investigate and make recommendations on the development of a program for the teaching of 'occupational English'. The working group should report to the two Ministers most closely involved, the Ministers for Education and Immigration and Ethnic Affairs. Because of the technical nature of the subject the working group should be chaired by the representative nominated by the Minister for Education. The membership of the group is a matter for the joint decision of both Ministers but the Committee suggests the following possible membership for consideration:

Representative nominated by:

- the Minister for Education (Chairman)
- the Minister for Immigration and Ethnic Affairs
- the Vice-Chancellors' Committee
- the Principals of Colleges of Advanced Education

119
the State TAFE authorities
the Council on Overseas Professional Qualifications, and
such other experts as the Ministers may identify.

(Recommendation 12)
INTRODUCTION

1. Any person contemplating migration to another country requires ideally a wide range of information together with the opportunity to discuss with a knowledgeable person the relevance of that information to his or her personal situation. Even with such assistance at the pre-migration stage, most immigrants require, in the early stages of settlement, further information and counselling.

2. For the qualified applicant the provision of information and the availability of counselling are even more critical. Furthermore, the complexity of assessment procedures in Australia intensifies both the need for careful counselling and the difficulty in providing it at an adequate level.

3. An appropriate service will provide both information and counselling. Information covers the provision, in sufficient detail and with adequate clarity, of all relevant information on assessment procedures, facilities available to enable an applicant to move through those procedures and the consequences of non-recognition together with the availability of any alternative courses of action. Counselling involves giving individuals the opportunity to relate the above information to their own unique situation, assisting them to weigh up carefully their chances and their willingness to take a risk if one exists, and generally to explore carefully the realities of the situation as it applies to them at all relevant levels. Furthermore, an appropriate system will provide this information and counselling service both overseas and within Australia.

4. The provision of information and counselling for immigrants, especially potential immigrants who are still abroad, is not a straightforward matter. Consideration must be given to the fact that intending immigrants may have difficulty in accepting information that might appear to place a negative connotation on their migration. In many situations individuals may be excluded from the family's decision-making process by a dominant spouse or parent and, moreover, the selection officer may ignore their role in the selection process. To overcome such barriers requires a reasonable degree of ability and sensitivity on the part of all those entrusted with the information and counselling role.

5. The Committee of Inquiry has confined its consideration of counselling to its role in the recognition of qualifications, while recognising that the information-counselling role in the migration process is a far broader one.
6. From a wide variety of submissions and consultations the Committee was told that the information-counselling provisions relating to recognition procedures were inadequate. There were 63 submissions received by the Committee criticising one or more of the following areas: counselling overseas, counselling available generally within Australia and counselling provided within the various trades and professions.

COUNSELLING OVERSEA

7. The aim of counselling overseas is to ensure that applicants for immigration are well informed about Australia and have realistic expectations on which to base a decision. Some submissions (for example 413, 439) highlighted the importance of comprehensive information and counselling being available at overseas posts to provide prospective immigrants with an accurate picture concerning recognition of overseas qualifications, employment opportunities and difficulties likely to be encountered in Australia.

8. The Committee recognises that there may be some resistance to counselling by some individuals where eagerness to migrate overrides prudence. Applicants should assume some responsibility for informing themselves about Australia before they decide to migrate, provided information is available. However, as the settlement process on arrival in Australia depends very heavily on the immigrant gaining appropriate employment which in turn may depend on recognition of qualifications, the Committee regards overseas counselling on this subject as a legitimate and important function of the overseas post. It is one which cannot be done adequately simply by referral to agencies in Australia.

9. The opportunities exist for the provision of information and counselling through office displays, audio-visual material, information leaflets, correspondence and personal contact with staff at overseas posts. These opportunities occur at the enquiry stage, during group counselling sessions at a limited number of posts, during selection interviews and in correspondence with applicants.

10. Submissions critical of counselling provided overseas generally pointed to a lack of or wrong information being given at overseas posts (for example 14, 227, 241, 282, 295, 351). The Australian Institute of Multicultural Affairs in its 'Evaluation of Post-Arrival Programs and Services' stated:

It (the Evaluation) notes, as did the Committee of Review of Migrant Assessment, that a number of people consulted complained that the accuracy of that information left much to be desired, particularly on matters such as the recognition of qualifications and the availability of employment.
The Department of Immigration and Ethnic Affairs (DIEA) has recently introduced a series of nine leaflets on a number of general topics of interest to the prospective immigrant, such as migration requirements, housing, employment and help after arrival. The leaflets are couched in general terms for ease of understanding and so as not to date quickly. They are intended for distribution to applicants prior to any selection interview or group counselling session and would normally be available in the applicant's language. As an example, the following are extracts from two of these leaflets, 'What are my Prospects' and 'What about Employment' respectively:

Migrants who will be dependent on employment for an income will need to have work skills or qualifications that are both formally recognised and currently in demand in Australia. They also should consider the prospects for members of their families who may need to find employment.

Obviously you will want to discuss employment at your selection interview in the light of your work experience and the current demand in Australia. Questions you should consider include:

Would your trade or professional qualifications be recognised in Australia?

The Committee considers that these leaflets are helpful in that they raise the question of recognition in the applicant's mind. However, it is important that more detailed information on recognition of qualifications is also available to the applicant to aid his decision-making.

The Committee on Overseas Professional Qualifications (COPQ) has prepared booklets which give some background on eighteen professions together with the relevant assessment and registration procedures. The booklets do not cover all professions and in some professions do not describe adequately the difficulties likely to be encountered in sitting examinations. The booklets are sent to all overseas posts for the use of officers but limited numbers supplied prevent them being generally available to applicants. Moreover, the booklets are produced only in English.

Other information available to the officers providing counselling is limited. The Department of Employment and Industrial Relations (DEIR) prepares an annual publication, 'Employment Prospects by Industry and Occupation' which gives descriptions of the occupations, and workforce and labour market details in the professional, sub-professional and trade areas. It does not include recognition, licensing or registration procedures. Further supplementary information is available on licensing and registration where it is produced by the relevant authorities.
14. The opportunity for specific counselling on a personal basis is generally restricted to selection interviews and there are several limitations on counselling in this context. Time is limited in these interviews; the resistance of the applicant to counselling may reduce the applicant's ability to absorb the relevant information; and moreover, the complexity of assessment processes together with the non-uniformity of licensing and registration between the different States, makes it very difficult for any one person to have a depth of knowledge on the subject.

15. The Committee therefore considers that there is a need for detailed information to be available at overseas posts and recommends that COPQ (see Chapter 10) and DEIR through the Central Trades Committees administering the Trademen's Rights Regulation Act (TRRA) and, when formed, the Trades Recognition Co-ordinating Committee (see Chapter 11) take steps to update and improve the range and quality of information on recognition procedures available to those counselling immigrants as well as to the immigrants themselves, the information to highlight difficulties which may be experienced by immigrants.

(Recommendation 13)

16. The Committee considers that information on assessment procedures should include details such as:

- licensing and registration requirements;
- examination details;
- English requirements;
- knowledge of Australian regulations; and
- delays involved.

17. The Committee's attention was drawn to leaflets produced by the Canadian Department of Manpower and Immigration on a number of occupations for the information of prospective immigrants. The leaflets contain similar information to DEIR's 'Employment Prospects by Industry and Occupation' but also include for each occupation, general requirements for registration, certification or licensing, specific requirements by Province and Territory, details of assessment authorities and details of associations or trade unions. The Committee notes that the contents of the leaflets are very similar to its requirements and considers that COPQ and DEIR should take note of the leaflets' content and format in improving the range and quality of information available on recognition procedures.

18. As outlined in Chapter 4, any face to face counselling is given by selection officers or technical advisers, although the task may fall to locally engaged staff at the enquiry stage. The technical adviser has a background in at least one of the trades under the TRRA together with a wide knowledge and experience of related trades and industry generally. He concentrates on counselling applicants in the trades covered by the TRRA, although, where his workload permits, the technical
adviser's trade expertise may also be used in relation to other trades. The Committee supports this use of technical advisers for counselling all tradesmen, where workloads permit. Selection officers cover other occupations in the professional or sub-professional areas. This is appropriate only if selection officers have adequate training and time available for this purpose.

19. Apart from having adequate and up-to-date information available for counselling, the Committee considers that officers should have adequate training to understand the procedures and complexities of the recognition issues. The Committee believes that the training of technical advisers is adequate as the training is designed 'to ensure the trainees obtain a thorough working knowledge of all the operational bodies concerned with the administration of the TRR Act and their practices and procedures' (399). However, the Committee considers that there may not be sufficient emphasis on recognition issues given in the training program for overseas selection officers. The submission from the former Department of Employment and Youth Affairs (368) supports this view.

20. The Committee, therefore, recommends that DIEA carefully re-examine its training programs for overseas selection officers with a view to improving the depth of understanding of the procedures and complexities of recognition issues, and thus improving the quality and availability of counselling at overseas posts.

(Recommendation 14)

21. The nature of any detailed counselling at overseas posts will depend on whether an applicant's or any other family member's qualifications are to be assessed prior to migration or not. Migration policy requires assessment of qualifications only of the principal applicant for eligibility in some migration categories. However, DIEA encourages all prospective immigrants and their families with qualifications in the professional, sub-professional and trade areas to have their qualifications assessed. The Committee supports this approach.

22. For those applicants who need or decide to have their qualifications assessed, advice is given on procedures for obtaining recognition while outside Australia. Once the assessment is completed, applicants are given details of any licensing or registration requirements which may need to be met for employment in Australia. This may be during an interview or in written form.

23. Where assessments are not favourable, the Committee considers that the reasons should be given, especially where applicants are still eligible for immigration under other criteria. A number of submissions (for example 375, 418) suggested that, in these cases, applicants should be provided with information on any additional training or experience required to permit entry to their respective professions.
or trades in Australia. The Committee supports this view but recognises that generally advice would need to be sought from the appropriate authority in Australia before the applicant could be given accurate information.

24. Special problems can occur where an applicant's qualifications and experience cannot be classified into an Australian occupation. On arrival in Australia, these immigrants will not be able to gain appropriate employment without retraining. It is therefore important that they are aware, prior to departure, of the extent of retraining necessary.

25. Where applicants do not have their qualifications assessed, they are or should be advised that the recognition of their qualifications is not assured and may affect their employment prospects. The selection officer can ask them to sign a statement that they understand and accept the situation. In such cases it is important that details of recognition procedures are provided.

26. The Committee considers that once accurate detailed information is available at overseas posts (see para. 15) and officers adequately trained (see para. 20) these procedures will allow prospective immigrants to be appropriately informed. These procedures should apply to all prospective immigrants so that they are aware of any recognition requirements which may affect them entering the workforce.

27. A number of submissions (for example 300, 439) drew special attention to problems of female immigrants. Qualified female immigrants may initially intend not to work on arrival in Australia; however, their circumstances can change so that it seems advisable that they be regarded always as potential employees. The submission from the Victorian Ministry for Immigration and Ethnic Affairs (439) stated:

> Particular attention should be given to counselling of women who at a pre-embarkation stage may not have a desire to work but who for economic and other reasons may want to enter the workforce after their arrival in Australia.

The Department of Immigration and Ethnic Affairs (300) stated:

> The Department recognises that there is a need to ensure that migrant women and their spouses are adequately counselled on the issue of workforce participation and on the range of problems involved in gaining recognition of their qualifications.

The Committee supports these views.
28. The Committee recognises that any prospective immigrant, not intending to enter the workforce, may not be receptive to counselling prior to migration. However, the Committee considers that it is important that any person with qualifications in the professional, sub-professional or trade areas should be aware of the range of problems which may have to be faced in gaining recognition of these qualifications in Australia. This information could affect the family's decision to migrate. The Committee, therefore, recommends that the counselling process on recognition of qualifications be extended in all cases, to spouses of the principal applicants.

(Recommendation 15)

29. Submissions (for example 346, 439) also pointed to a need for similar counselling of refugees. Counselling overseas is currently limited to advising the refugees that there may be difficulties in gaining recognition of their qualifications and that it may be necessary to undertake unskilled work if employment in their own field is not immediately obtainable.

30. The Committee considers that the needs of refugees are not different to those of other immigrants. Although refugees do not have as much choice of country of settlement as other immigrants have and may not therefore be able to select a country where their qualifications are recognised, it is still important that they be aware, prior to their departure for Australia, of any likely difficulties of gaining recognition of their qualifications. In this way, their expectations on arrival should be more realistic. The Committee therefore recommends that, just as for other immigrants, information on recognition and assessment procedures be made available to refugees.

(Recommendation 16)

GENERAL COUNSELLING IN AUSTRALIA

31. The criticisms in submissions of counselling available in Australia covered both counselling facilities and the nature of advice and assistance available. Some were critical of the unco-ordinated approach to counselling and the lack of one central authority in each State (for example 319, 336, 358, 368); and others were critical of the advice and assistance available to those individuals who were experiencing difficulty in gaining recognition in one way or another (for example 2, 222, 356).

32. The Adult Migrant Education Program, available to all non-English speaking immigrants and refugees on their arrival in Australia, is designed to cover briefly in one of its several information sessions recognition of qualifications at a general level. Alternately, general information and counselling may be available from a number of sources such as
DIEA's Regional Offices, the Commonwealth Employment Service, Migrant Centres, Migrant Resource Centres, State Ethnic Affairs Commissions and relevant ethnic agencies.

33. When it comes to specific matters, because of the multitude of assessment, licensing and registration authorities and procedures, the Committee considers that there is a need within each State for a single visible authority to provide a central source of information and to deal with applications to the various assessing authorities. The agencies providing general counselling would then not need to become involved in the complexities of the actual procedures. Immigrants could then approach one authority with the knowledge that the advice would be accurate and that they would not be referred from one authority to another.

34. A number of submissions (for example 208, 336, 370) drew the Committee's attention to the work of the N.S.W. Ethnic Affairs Commission's Overseas Qualifications Unit and submission 356 to the work carried out by the South Australian Ethnic Affairs Commission. Both of these Commissions are actively involved in counselling and advocacy on recognition issues. The work of the N.S.W. unit, in particular, was seen as a good example for other States because of the importance of having appropriate counselling available to overseas-qualified immigrants at the State level. Moreover, it seems appropriate that this service be related closely to the various other services logically provided by State Ethnic Affairs Commissions. However, while such a service should be provided by the States it is not appropriate that the Commonwealth pass all responsibility for such a service to them. The Committee is therefore of the opinion that, to ensure that such services are developed and that they relate to immigration intake policies and to the work of COPQ and the Trades Committees, the Commonwealth should make a significant financial contribution to the provision of these services.

35. The Committee recommends that the Minister for Immigration and Ethnic Affairs through his State government counterparts request that State Ethnic Affairs Commissions, where they exist, or State departments responsible for Immigration and Ethnic Affairs in other States, accept responsibility for the provision of a comprehensive counselling service in their own State. The Commonwealth should make a significant financial contribution to the provision of these services. These bodies should maintain a sufficient degree of expertise and a close liaison with COPQ, Trades Committees, State Industrial Training Commissions and other State and Commonwealth licensing and registration authorities.

(Recommendation 17)

36. The Committee believes the State agencies should limit themselves to being a source of information and assisting the immigrant through the recognition procedures. Where
counselling is required on the content of examinations, reasons for non-recognition, courses or transfer of skills to another occupation, it is important that the professions and assessing authorities become involved in the counselling process.

COUNSELLING WITHIN THE PROFESSION AND TRADE

37. Criticism of counselling advice received from assessment and licensing authorities was mainly at the professional level (for example 27, 146, 411) although the trades were not excluded (for example 234). The main subject of the criticism was information on examinations and lack of reasons for non-recognition.

38. In the professions, such as medicine, dentistry and physiotherapy, information booklets are available for candidates taking examinations. However, given the importance of the examination for recognition, the information given in it on the range or depth of knowledge tested in the examination, or the skills tested in the clinicals, appears to be very limited.

39. The Committee recommends that the responsible professional and trade authorities take steps to improve the depth and quality of advice given to candidates for examinations and that this include:

(a) detailed information on the objectives of the examination and the standards and skills being tested, and, where possible, access to examples of past examination questions; and

(b) detailed information on pass or fail performance.

(Recommendation 18)

40. In cases of non-recognition resulting from either failing an examination or not meeting other requirements, further counselling should be available. This is supported in DIEA's submission (300):

There is frequent criticism of existing resources for counselling migrants resident in Australia who are unsuccessful in gaining recognition of their qualifications. The objective of such counselling would be to identify remedial action which can be taken by the migrant, consistent with the Government's principle of self help.

41. The Committee considers that remedial action could take various forms including reorientation and retraining either through formal courses or supervised practice. In some cases, the remedial action may be to advise applicants to transfer their skills to another occupation.
42. The Committee therefore recommends that applicants unsuccessful in gaining recognition be further counselled to identify appropriate remedial action. Because of the specialised nature of the counselling, it should ideally be provided by the authority carrying out the assessment. Where this is not practical, it will be necessary for the State agency earlier proposed to act in a co-ordinating role with the relevant authorities.

(Recommendation 19)

43. Counselling will be discussed further in Chapters 10 and 11 on the assessment and recognition of overseas-qualified professionals and tradesmen. Moreover in its examination of particular occupations in depth, the Committee reached specific conclusions and recommendations for action which frequently included the area of counselling.
CHAPTER 9

NEED FOR REORIENTATION AND RETRAINING

INTRODUCTION AND DEFINITION OF TERMS

1. Immigration policy is seen as a way of supplementing the supply of skills needed in the labour force, and of meeting social and humanitarian obligations by reuniting family members and resettling refugees and displaced persons. In order to have a successful immigration policy, it is important that these people settle satisfactorily into the community.

2. Evidence suggests that the inability of immigrants to enter a trade or profession for which they are trained results in many instances in a high level of dissatisfaction. However, in order to enter a trade or profession, a person must have a minimum level of competency which involves both technical skills and a knowledge of Australian codes, practices and conditions. This level is established by meeting requirements of professional associations, licensing or registration authorities or employers.

3. Immigrants selected on the basis of their skills are selected only if it is established that their qualifications are acceptable. However, any assessment is only of technical skills. These immigrants may still need training or experience in Australian codes, practices and conditions.

4. Of the immigrants arriving in other categories of the immigration policy, only a limited number are required to have or do have their qualifications assessed prior to departure for Australia. For their successful settlement, these immigrants need adequate opportunity to obtain recognition of existing skills.

5. For all the above reasons, the Committee considers opportunities for reorientation and retraining to be an essential part of recognition procedures. Without these a considerable proportion of persons with overseas qualifications is unlikely to achieve recognition.

6. The Committee regards reorientation and retraining as two different concepts. Reorientation is used to describe the process of adjusting a person's knowledge and mode of practice of his occupation to Australian conditions and conventions. The Committee considers that reorientation includes what is commonly meant by bridging and refresher courses. Reorientation covers familiarisation with the local environment and conditions, taking a short refresher course in an existing skill and/or instruction in a particular aspect of the occupation not covered by the overseas course of training. It may be provided in the context of supervised practice or on-the-job experience under a form of limited registration,
through planned classwork at an appropriate tertiary institution using existing or specially designed courses, by private study of prescribed material or by a combination of these.

7. Reorientation can include an English language component. As outlined in Chapter 7, the Committee is of the view that English language training and vocational courses should be seen as separate but complementary components. However, levels of general fluency appropriate to the intended occupation need to be achieved before attempting any reorientation program.

8. Retraining is used in the sense of requalifying. It can mean relearning the occupation from the beginning or from a point substantially below the completion point, say 12 months or greater. The term is also used here in the sense of qualifying for a different occupation which may or may not be related to the original occupation.

NEED FOR REORIENTATION

9. The importance of gaining knowledge and experience in Australian codes, practices and conditions was highlighted in a number of submissions (for example 1, 132, 162, 347, 439) covering both the professions and the trades. For example, the Master Builders' Association of South Australia in its submission (32) stated:

Experience in this area has shown that, while tradesmen and semi-skilled workers may be competent in their chosen 'trade' area within their own country, they are not necessarily competent when joining the industry in South Australia because of the different standards of construction which are required and imposed by State legislation.

Accordingly, it would be our consideration that, in the area of licensing within this State, it is most essential that people with relevant overseas qualifications and knowledge should be required to undertake a period of training in local requirements, coupled with a period of gaining practical experience in those requirements, before being issued with a licence.

The Committee on Overseas Professional Qualifications (COPQ) has been advocating for a number of years provisional registration 'as a means of facilitating the integration of a person into his profession in Australia and to permit practice under supervision where this is a necessary adjunct to the assessment process' (COPQ's Sixth Annual Report, December 1974).
10. These considerations have been put into practice in a number of occupations such as plumbing and physiotherapy where a period of practical experience under supervision is one of the requirements of the registration or licensing procedure. In other occupations, for example electricians, the licensing system has a number of levels to ensure that people gain supervised experience before being allowed to work unsupervised. In the trade area, the Committee also found that there is a number of reorientation courses available.

11. This need for knowledge of Australian codes, practices and conditions is also incorporated in recognition procedures by written, oral and/or practical examinations. In its investigations, the Committee found that many of these recognition procedures, some of which are comprehensive and hence costly, are wasted because failure rates amongst immigrants are high. The Committee believes that immigrants generally have difficulty in meeting the requirements as they do not have the opportunity to learn and gain practical experience in Australian codes, practices and conditions prior to examination, as do other Australian residents in the normal course of their training.

12. The recognition procedures have been established for both Australian trained and overseas qualified persons to ensure that minimum standards are maintained within occupations. Once these standards are reached, individuals are qualified to work in their occupations and to compete with other individuals for available positions. Immigrants should have the same opportunities as other Australian residents to compete for vacancies in their profession or trade. To give immigrants this opportunity, they need a knowledge of and experience in Australian conditions. The Committee recognises the need for reorientation programs and has recommended firstly in Chapter 10 that the terms of reference for COPQ be expanded to include the examination of the need for and the organisation of reorientation programs, and secondly in Chapter 11 that the committees administering and co-ordinating the recognition procedures in the trade area examine the question of reorientation programs. The Committee has also made recommendations on supervised practice in medicine (Chapter 12), dentistry (Chapter 13) and physiotherapy (Chapter 14). All reorientation programs should not be available only to immigrants but, as a matter of principle, to other Australian residents as well.

13. Where selected for their skills, it is important that these immigrants have the opportunity to move quickly into the workforce at their appropriate level. Other immigrants should also have this opportunity. Governments have a responsibility, as far as is practicable, to ensure that any skills gained overseas are not wasted. The Commonwealth Government has the responsibility for the successful settlement of immigrants into
the Australian community. State Governments benefit from a successfully settled immigrant and are also responsible for most of the legislation covering licensing and registration.

14. The Committee therefore recommends that in situations where COPQ, Central Trades Committees, the Trades Recognition Co-ordinating Committee (when formed) or other responsible authorities identify a need for reorientation programs, favourable consideration be given by both Commonwealth and State Governments to the provision of funds to meet that need.

(Recommendation 20)

15. There are a number of organisations trying to assist immigrants and refugees by taking the initiative in organising reorientation courses where special needs arise. Examples which have been brought to the Committee's notice include a special intensive language course for refugee medical students at the University of Sydney to improve conversational 'professional' English and a concentrated trades revision course for electrical workers at Balga Technical College in Western Australia to assist both immigrants and others to qualify for a licence.

16. The Committee believes organisations trying to assist immigrants should be encouraged. However, it has been brought to the Committee's attention that there is little financial support available to organisations trying to take the initiative. For example, in a letter to the Committee, Professor R Gye* stated:

It appears that at present no single organisation or department is prepared to accept responsibility for coordinating the training and assistance required by foreign graduates and students and while individual hospitals, medical schools or other bodies are contributing in small ways, their ability to respond to special needs of this kind is extremely limited. Accordingly, I consider that until a coordinated programme is available a source of special funding be set up, possibly through the Department of Immigration and Ethnic Affairs, from which assistance can be sought.

Professor Gye was indicating a difficulty in funding a special intensive language course for refugee medical students. During consultations with the Committee, other persons indicated that

* Professor Richard Gye, Dean of the Faculty of Medicine, University of Sydney. Letter to the Committee of Inquiry into the Recognition of Overseas Qualifications, 24 September 1982.
they had run into similar problems when looking for assistance for special projects and this is likely to be an ongoing need. The Committee, therefore, sees these special projects as an integral part of any reorientation program and supports the need for funds to be available to provide assistance.

17. The Committee therefore recommends that the Minister for Immigration and Ethnic Affairs and the Minister for Employment and Industrial Relations have supplementary funds available to provide assistance, where the needs are identified, for the short-term funding of special projects initiated by any private or public body and aimed at assisting the reorientation of immigrants and refugees.

(Recommendation 21)

NEED FOR RETRAINING

18. The Committee sees retraining as the most appropriate solution for individuals where reorientation is insufficient but use can be made of overseas skills as a foundation, where the individual's qualifications and/or previous occupation have no reasonable equivalence in Australia, and where failure in the assessment test results in a need for relearning the same occupation or learning a new occupation.

19. The Committee does not believe that, in general, there is any need for special provisions to be made for the retraining of these individuals. Within Australia there is a system of tertiary education and training designed to prepare individuals for entry to the various occupations. Immigrants requiring retraining should make use of these facilities. However, the special situations of some immigrants might well be taken into account in the planning and development of such facilities.

20. Submissions (for example 208) to the Committee indicated there was a demand for retraining courses. Other submissions (for example 293) suggested that immigrants whose qualifications have not been recognised or who need to complete their studies should be ensured a place in the appropriate course at universities or colleges.

21. The Committee does not deny that there is a demand by immigrants for these courses. However, there is also a similar demand from other Australian residents. The Committee believes it is important that all immigrants, including overseas graduates who need to requalify to enter an occupation, and other Australian residents have equal opportunities in competing for places in these courses.
COUNSELLING

22. Counselling is an important requirement in any reorientation and retraining program. To avoid both the waste of resources and skills and the loss of capacity to settle, through fruitless attempts at inappropriate courses, counselling should be available at an early stage in the recognition process. The need for this counselling is identified in Chapter 8. In the provision of this counselling, it is important that the services of existing agencies active in the field of vocational counselling, such as course advisers at Colleges of Technical and Further Education and Department of Employment and Industrial Relations (DEIR) Careers Reference Centres, are used, together with any agencies specialising in immigrant counselling in this area.

FINANCIAL SUPPORT FOR INDIVIDUALS

23. A number of submissions (for example 227, 336, 414, 439) saw the need for appropriate living allowances to be available to immigrants taking full-time courses. Other submissions (for example 241, 289, 409) pointed to inadequacies of existing systems of allowances available to students.

24. As is discussed in Chapter 4, the Committee believes all immigrants with overseas qualifications should have the same opportunity as other Australian residents to reach the required standards in their occupations and should have use of existing systems. For other Australian residents involved in gaining the relevant qualifications and training, financial assistance or allowances are available. This same assistance is not always available to immigrants trying to reach the same goal.

25. The Committee therefore recommends that the Minister for Immigration and Ethnic Affairs establish a working party to identify changes that need to be made in guidelines and arrangements for existing programs of financial support for study and training in order to ensure that persons who originally qualified overseas and now seek to be recognised in the same field in Australia have the same access to financial support as other Australian residents. The working party should have representation from DEIR and the Departments of Education, Finance and Immigration and Ethnic Affairs.

(Recommendation 22)
CHAPTER 10
GOVERNMENT STRUCTURES FOR THE ASSESSMENT AND RECOGNITION OF OVERSEAS-QUALIFIED PROFESSIONALS

INTRODUCTION

1. Since 1969, the Commonwealth has operated through the Committee on Overseas Professional Qualifications (COPQ)* to address the complex issues of recognition of overseas qualifications. COPQ was established by the Minister for Immigration to provide a research and information service with two broad aims:

   . to enable Australian Government Offices overseas to give prospective immigrants an accurate assessment of their professional qualifications in Australian terms, to assist them in making decisions on whether or not to migrate, and

   . to assist holders of overseas qualifications, already resident in Australia, to obtain assessment of their qualifications either directly or through professional or regulatory bodies, colleges, universities or other assessment agencies as appropriate. (paraphrased from COPQ 13th Annual Report)

2. The COPQ Secretariat is staffed by officers on establishment of the Commonwealth Department of Immigration and Ethnic Affairs, and is supplemented by Registrars in various professions employed under grants-in-aid. Its activities are funded by the Commonwealth Government principally as part of the appropriation of the Department of Immigration and Ethnic Affairs.

3. COPQ performs its functions with the assistance of panels of experts which have been established in fifteen specific professions. Two additional panels deal with generalist and technical qualifications. In 1981, 664 individuals who had been trained overseas were recommended as meeting Australian requirements in their respective professions; the generalist panel assessed 170 individuals as equivalent to graduate status; in 'non-panel' disciplines favourable assessments were made or obtained for 3000 prospective migrants; and Australian colleges and universities were assisted in evaluating the overseas qualifications of 300 prospective students.

* For further details see Appendix 1
4. In order to make these assessments COPQ had to achieve an accepted single national standard for a profession out of the standards already operated by a number of different State bodies. The difficulty of this has constantly to be borne in mind. The recognition of qualifications in Australia (except in Commonwealth territories) is, in most cases, a power exercised by State Governments through numerous registration and licensing boards.

5. Full details of the establishment and operation of COPQ are contained in Appendix 1 and in the annual reports of COPQ, the latest of which was for the year ended December 1981.

NEED FOR PERMANENT BODY

6. COPQ was initially seen as having a limited life. As the discussion in this chapter will show, those who use COPQ, that is, the immigrants themselves, Federal and State Government departments, colleges, universities, employers and professional associations, not only want it continued, but its role expanded.

7. Under our federal system there is a long history of each of the States deciding whether or not to legislate to regulate a particular occupation. Where legislation has been passed, and there is now a considerable body of it in every State, elaborate machinery has been established to administer it.

8. In addition to this, in occupations not regulated by legislation there exist professional associations which have themselves developed standards considered appropriate for training and entry to that profession.

9. As a result of developments to date, recognition and licensing procedures in the various States and Commonwealth territories represent a maze which has to be mastered by the immigrant. The Ethnic Affairs Council of NSW in its submission (208) described it as "finding the way through the labyrinth". An appreciation of the complexity facing an immigrant will be gained from a reading of papers in the appendix covering the professions and trades examined by this Committee.

10. One of the tasks of COPQ is to simplify this complexity, to encourage the establishment of single national standards and procedures for assessment and recognition for each profession, sub-profession and technical occupation which can be used in evaluating overseas qualifications. COPQ has made significant progress in this direction, but much remains to be accomplished.

11. The Commonwealth Department of Education in its submission (398) drew the Committee's attention to the Final Report of the Committee on Community Relations (1975)* which

* A Committee of the Immigration Advisory Council which ceased to function after 16 August 1974.
credited COPQ as indirectly influencing professional bodies throughout Australia towards nation-wide recognition of overseas qualifications and portability of such qualifications between States. The Committee agrees with this view and adds that this influence of COPQ should not only be continued, but strengthened.

12. This Committee in its detailed review of the assessment and recognition procedures of a number of professions and trades as they applied to immigrants found a need for considerable improvement. COPQ, on a continuing basis, should have the responsibility for ensuring that assessment and recognition procedures are fair and equitable and free from discrimination.

13. There were no submissions which argued for the termination of COPQ. Submissions from individual immigrants and from representative ethnic bodies sought expanded services from COPQ, particularly in relation to the provision of bridging courses and adequate advice and counselling. The Commonwealth Department of Education (398), the Australian Vice-Chancellors' Committee (256) and the Australian Conference of Principals of Colleges of Advanced Education (175) all supported a national body for the assessment and accreditation of non-Australian qualifications. The only point raised was its scope, that is, whether the trades should also be included. The Committee discusses this aspect in paragraph 77 of this chapter.

14. The Committee has no doubt that COPQ has a vital and important function to perform. It is recommended that COPQ be seen as a permanent part of Commonwealth Government machinery and that all subsequent recommendations as to its status, structure, functions and resources be judged on this basis.

(Recommendation 23)

EXPANDED ROLE

15. Submissions from significant educational and professional bodies and ethnic groups called for extra services to be provided by COPQ. Prominent amongst these were requests for counselling facilities and the organisation of bridging courses. (Australian Jewish Welfare and Relief Society 336 - Victorian Ministry of Immigration and Ethnic Affairs 439).

Counselling

16. The Committee not only found considerable criticism of present counselling arrangements in the submissions received, but also perceived from its consultations and its review of procedures that immigrants are in need of considerable assistance by way of detailed information, advice and counselling.
17. The assistance now given to immigrants in relation to the assessment and recognition of qualifications is rendered by a number of agencies overseas and in Australia. A description of counselling now available and that proposed is given in Chapter 8.

18. As will be seen from Chapter 8, COPQ has a vital role to play in the counselling process but this function is not specifically given to COPQ in its terms of reference and there is no evidence of staff or funds being provided for this purpose.

19. A pre-requisite for the rendering of good advice and counselling is adequate up-to-date information on the factual situation in regard to the relevant assessment and recognition procedures. The Committee has concluded that COPQ is in the best position to maintain up-to-date literature providing this basic information and that it is appropriate for staff and funds to be made available for this purpose.

20. The information and literature referred to should be available generally, and specially for the use of the Department of Immigration and Ethnic Affairs, other Federal and State Government departments, statutory bodies, educational institutions, professional associations, employers, trade unions and ethnic communities.

21. The Committee therefore recommends that COPQ's terms of reference be amended to require it to:

(a) provide detailed current information on the assessment and recognition of overseas qualifications for the use of all concerned with the rendering of advice to, or counselling of, immigrants and prospective immigrants; and

(b) provide advice and assistance to immigrants and prospective immigrants seeking to have their overseas qualifications assessed and recognised.

[Terms of Reference 5 and 6 below]

(Recommendation 24)

Reorientation and Retraining courses

22. Submissions generally drew attention to the need for bridging courses, and this, too, became evident to the Committee in its examination of the selected professions and trades. The need appears to become particularly acute where overseas professional training and practice differ from that in Australia and familiarisation with Australian standards is a pre-requisite to practice.
23. COPQ, with its now extensive experience, has reported constantly on the need for bridging courses as a means of facilitating entry to professions by those trained overseas who could not obtain immediate recognition of their qualifications.*

24. In Chapters 12 to 15, examples are given not only of the need for such courses but also recommendations are there made by the Committee as to how they may be introduced.

25. In these chapters attention is also drawn to the financial difficulties which some candidates may face and it is suggested that repayable loans or payment of special allowances may, in appropriate circumstances, have to be considered.

26. The Committee has concluded that responsibility for making recommendations both as to courses and to financial assistance should be placed with COPQ.

27. The Committee recommends that COPQ's terms of reference be amended to place the responsibility with COPQ to:

(a) identify the need for and make recommendations to the Minister on, the organisation of and the provision of funds for reorientation and retraining courses; and

(b) recommend to the Minister, as appropriate, the making of loans or the payment of special allowances to those attending such courses.

[Terms of Reference 7 and 8 below]

(Recommendation 24)

Conduct of Examinations

28. COPQ, through its expert panels, has been able to arrange examinations for the overseas trained in Dentistry, Dietetics, Medicine, Nursing, Pharmacy, and Physiotherapy. Examinations are in a developmental stage in Accountancy, Dental Technics, Occupational Therapy, Podiatry and Veterinary Science. Details of some of these examinations are given in Chapters 12, 13 and 14.

29. Despite this work there is no specific authority in the terms of reference of COPQ empowering it to conduct examinations and to issue certificates to successful candidates. COPQ has accordingly (as discussed in para. 83, dealing with the legal status of COPQ) encouraged the incorporation of its own expert panels for this purpose. When incorporated they are, of course, separate legal entities and

not subject to COPQ control. The Committee does not favour this fragmenting of the total responsibility of COPQ and believes COPQ itself should be authorised to conduct examinations.

30. **The Committee recommends that COPO's terms of reference be amended to include authority to conduct examinations in Australia and overseas and award certificates to successful candidates.** [Term of Reference 1(e) below]

(Recommendation 24)

**Constant Review of Assessment and Recognition Procedures**

31. An immigrant seeking the assessment and recognition of his qualifications may fall into one of a large number of professional, sub-professional and technical occupations.

32. Having regard to the size of the task and limitations of time, the Committee decided to concentrate its efforts upon specified occupations as explained earlier. The results of the investigation carried out (see later chapters) have shown clearly the justification for the Government setting up the Committee of Inquiry.

33. The results also suggest that the need exists to examine and report on the assessment and recognition procedures in other occupations. As this remains a task of considerable magnitude the Committee has concluded that this responsibility should be given to COPQ to deal with on an on-going basis according to priorities which it assesses.

34. Accordingly, the Committee recommends that COPQ's terms of reference be amended to include the power to review the procedures for the assessment and recognition of overseas qualifications and where such procedures are found to be inadequate or inequitable, decide upon the action necessary to rectify the position, and

(a) take such action where empowered so to do, or

(b) recommend such action to the Commonwealth and/or relevant State Minister. [Term of Reference 4 below]

(Recommendation 24)

**Right of Appeal**

35. A number of submissions complained that there was no right of appeal from the decisions of most bodies concerned with the assessment and recognition of qualifications. The Committee's investigations revealed that decisions on
recognition by some professional and examining bodies are not subject to any formal appeal procedures although the opportunity exists for informal review.

36. The Committee believes a right of appeal should exist in spite of a number of difficulties which will be encountered in its implementation and the extra costs which will be incurred.

37. One considerable difficulty arises from the fact that most of the registration boards, licensing authorities and professional associations that make the decisions as to recognition are autonomous and need pay no heed to the recommendations of this Committee, or of COPQ.

38. The Committee has concluded that nonetheless, COPQ should be empowered to receive complaints arising from this situation, investigate them, and consult with the bodies concerned regarding the resolution of any perceived inequities or inconsistencies. Should the matter remain unresolved COPQ should report on such cases in its Annual Report.

39. Where decisions upon assessment and recognition are made by COPQ and those examining boards, panels and committees responsible to it, then COPQ itself should decide upon and implement an appeal process.

40. The Committee recommends that COPQ's terms of reference be amended to empower it to:

(a) receive, investigate and attempt to resolve complaints relating to the non-recognition of overseas qualifications, and

(b) decide upon and implement appeal procedures relating to the non-recognition of overseas qualifications in areas coming within its own sphere of influence.

[Terms of Reference 9 and 10 below]

(Recommendation 24)

Collaboration

41. From the submissions and consultations, and the knowledge and experience of its members, the Committee became fully aware of the complexity of the subject, the number of Federal and State Departments bearing some responsibility, the numerous State and Commonwealth Registration Boards and, certainly not least, the responsibility of all for the satisfactory settlement of the immigrant.
42. The Committee concluded that the assessment and recognition of overseas qualifications, bearing as heavily as it does on matters of employment, level of income and personal fulfilment, should be seen as a very significant part of the migrant settlement program.

43. The Committee concluded further that it was desirable that the need for collaboration and cooperation should be spelt out in the terms of reference of COPQ and expresses the hope that this will include a high degree of cooperation from all the departments and bodies with responsibility in these matters.

44. It is therefore recommended that the terms of reference of COPQ be amended to require it to:

(a) collaborate and co-operate with relevant Commonwealth and State departments and bodies and other relevant authorities to encourage the development of acceptable national assessment and recognition procedures; and

(b) ensure as far as lies within its powers the coordination of its activities within the total immigration policy and settlement program.

[Terms of Reference 2 and 3 below]

(Recommendation 24)

Relationship of COPQ to Commonwealth Registration bodies

45. The Committee believes that uniform national standards are a desirable aim. However, it notes that Commonwealth agencies are not obliged to accept the advice of COPQ even though it is desirable that advice should be acted upon uniformly at the Commonwealth level. The Committee realises that decisions to register persons with overseas qualifications within Commonwealth spheres rest with authorities such as Registration Boards of the A.C.T.

46. The establishment by the Commonwealth of a body with the specific purpose of giving advice on overseas qualifications would seem logically to carry with it a commitment on the part of the Commonwealth to ensuring, within its own spheres of influence and jurisdiction, that the advice given was acted upon.

47. It is not proposed however, that any change be made at this stage but, having drawn attention to the situation the Committee believes that COPQ should note the position and if specific problems arise draw them to the attention of the Government. If COPQ is established by statute, as recommended, (see paras 85 to 88), any difficulties as to recognition can be overcome by an appropriate amendment to the legislation.
Terms of Reference

48. To give effect to the foregoing recommendations the amended terms of reference would be: (existing terms of reference are underlined)

(1) Make assessments on its own authority of the comparability of overseas professional, sub-professional technical and general academic qualifications, with the standards required in Australia, and for this purpose:

(a) Seek out, assemble and collate information on overseas qualifications and maintain a reference library

(b) Supply information to Federal and State Government departments, statutory bodies, educational institutions, professional associations, employers, individuals and other responsible inquirers

(c) Appoint panels, or establish other mechanisms considered appropriate, to undertake detailed investigations and assessments including the authorising of such investigations as may be necessary in Australia and overseas

(d) Co-ordinate and oversight the work of such panels, mechanisms, investigations and assessments

(e) Conduct examinations in Australia and overseas and award certificates to successful candidates

(f) Establish and maintain close working links with relevant organisations overseas concerned with the assessment and recognition of qualifications, and, where appropriate, take part in their activities

(g) Advise the Minister as appropriate on fees for assessment services

(h) Recommend to the Minister the payment of such grants-in-aid as may from time to time be deemed necessary

(2) Collaborate and co-operate with relevant Commonwealth and State departments and bodies and other relevant authorities to encourage the development of acceptable national assessment and recognition procedures.
(3) Ensure as far as lies within its powers, the co-ordination of its activities with the total immigration policy and settlement program.

(4) Review the procedures for the assessment and recognition of overseas qualifications and where such procedures are found to be inadequate or inequitable, decide upon the action necessary to rectify the position, and

(a) take such action where empowered so to do, or

(b) recommend such action to the Commonwealth and/or relevant State Minister.

(5) Provide detailed current information on the assessment and recognition of overseas qualifications for the use of all concerned with the rendering of advice to or counselling of immigrants and prospective immigrants.

(6) Provide advice and assistance to immigrants and prospective immigrants seeking to have their overseas qualifications assessed and recognised.

(7) Identify the need for and make recommendations to the Minister on, the organisation of and the provision of funds for reorientation and retraining courses.

(8) Recommend to the Minister as appropriate the making of loans or payment of special allowances to those attending reorientation or retraining courses.

(9) Receive, investigate and attempt to resolve complaints relating to the non-recognition of overseas qualifications.

(10) Decide upon and implement appeal procedures relating to the non-recognition of overseas qualifications in areas coming within its own sphere of influence.

(11) Maintain records on the source and number of inquiries, requests for assessment or assistance and complaints received, and on the outcome of such inquiries, requests and complaints.

(12) Report on a continuing basis to the Commonwealth and State Ministers responsible for Immigration and Ethnic Affairs and prepare an Annual Report for tabling in the Commonwealth Parliament and in State Parliaments where so decided.
ENHANCED STATUS

49. The importance of the assessment and recognition of overseas professional qualifications in the migrant settlement program has already been stressed.

50. Attention has been drawn to the large number of bodies involved in this process and we now emphasise their status. There are Commonwealth and State statutory bodies (such as medical boards, dental boards, etc), incorporated professional associations (Institution of Engineers, Australia and many others), and autonomous educational institutions (Universities and Colleges of Advanced Education).

51. The Committee has concluded that if COPQ is to succeed in its leadership role at the national level consideration has to be given to its status. A number of matters will contribute to the status of the body including the following: the role and eminence of the chairman and the time he is able to devote to the task; the level of appointment of the Chief Executive officer; the quality of the membership of the governing body; and the legal authority upon which the body acts. These matters are dealt with subsequently in this chapter.

52. The Committee believes that the name of a body should also reflect its status and accordingly recommends that the word 'Council' be substituted for the word 'Committee' in the name of COPQ and that the name be 'Council on Overseas Professional Qualifications'.

(Recommendation 25)

STRUCTURE OF COUNCIL

Chairman

53. The role of the chairman is crucial to the leadership and success of COPQ in carrying out its terms of reference.

54. If the recommendations on the expanded role and legal status of COPQ are adopted there will be a considerable increase in its responsibilities and volume of work.

55. A major and constant responsibility of the chairman is liaison at the highest levels in governments, in educational spheres and with the professions.

56. The position of chairman is seen by the Committee as requiring a reasonable amount of time devoted to it, so that the objectives of COPQ can be furthered by representations at the highest level. It could be a part-time position. Against this, however, has to be balanced the need for an able and eminent person, who may have limited time available, to fill the position and provide the highest level of leadership possible.
57. The Committee recommends that the Minister, in considering the appointment of Chairman of COPQ, take into account not only the need for an able and eminent person to provide the highest level of leadership possible but also the desirability of the position being a part-time one if this can also be achieved.

(Recommendation 26)

Chief Executive Officer

58. COPQ should operate, as it does at present, with the assistance of a secretariat headed by a Chief Executive Officer reporting to the Chairman. The Committee sees the present responsibilities of the Chief Executive Officer being enlarged as a consequence of the recommendations in this report, including:

(a) the increased role of the Chairman;
(b) the enlarged terms of reference - counselling, reorientation and retraining courses, conduct of examinations, right of appeal, on-going review of procedures, and increased collaboration and cooperation with other authorities;
(c) the increased involvement of State governments, professional bodies and other Commonwealth Departments; and
(d) maintaining relationships with international organisations.

59. The level of leadership and supervision necessary for the achievement of COPQ's objectives is seen as requiring a high degree of proven executive ability.

60. Having regard to the Committee's previously stated view that the assessment and recognition of overseas qualifications has to be viewed in the context of the total migrant selection and settlement program, there would seem to be some advantage in the secondment to COPQ for a fixed term of a second division officer who is part of the Department of Immigration and Ethnic Affair's management team.

61. Accordingly it is recommended that the appointment to the position of Chief Executive Officer be at the level of second division of the Commonwealth Public Service.

(Recommendation 27)

Membership of Council

62. The original members of COPQ, of whom three still serve, were appointed as persons 'who by their personal ability have reached outstanding positions and are making a distinctive
contribution to their various fields of activity' (Ministerial Statement - Establishment of the Committee on Overseas Professional Qualifications - 27 March 1969). This philosophy has been maintained in appointing successive members. Although it has been considered desirable that membership should reflect a reasonable spread among the States, State representation as such has been avoided, as has representation of particular interests.

63. The Commonwealth Department of Education in its submission (398) said 'That membership of the body (should) be expert, flexible and balanced so as to be sensitive to the changing ethnic origin and socio-economic status of immigrants and refugees entering Australia'. The Committee agrees with this.

64. The Committee believes that the quality of the members of the Council is fundamental to its success, and should contain an even spread of community interests. In nominating and selecting members, factors taken into account should include:

- prominence in occupational, educational, legal, ethnic or general community affairs;
- ability to pursue objectives with government and other bodies and to command respect and confidence;
- commitment to the principles contained in the Council's terms of reference; and
- sufficient time to devote to the work of the council.

65. In view of the fact that the States are so heavily involved in the recognition process, as referred to earlier, the Committee has formed the view that they should be more directly involved in the work of COPQ. This means State representation on the Council.

66. While the Committee believes the Commonwealth should bear the major cost of running COPQ, it is of the view that the States should meet the cost of their representatives attending meetings of the Council.

67. The Department of Immigration and Ethnic Affairs has important policy and day-to-day responsibilities for immigrant settlement and the recognition of qualifications is an important part of this. It should share in the responsibility of COPQ by being represented on it by a senior officer.

68. The Departments of Education and Employment and Industrial Relations have very close interests in the responsibilities of COPQ and should be able to offer valuable advice and assistance. They should each be represented by a senior officer.

149
69. In order to achieve a proper balance of the qualities and attributes of members as discussed in paragraphs 62, 63 and 64, the Minister should himself appoint a further four members to the Council.

70. The Committee is aware that this is a considerable increase in the membership of the Council. However, it has concluded that if COPQ is to overcome the considerable obstacles in the way of development of national standards for the assessment and recognition of overseas qualifications, then wider interests have to share that responsibility within COPQ.

71. Fixed terms of office are considered necessary to allow for the infusion of new ideas, and these are suggested as 5 years for the Chairman and 3 for other members. The longer term of office for the Chairman is to provide for continuity. Appointments of members should be subject to renewal at the discretion of the Minister for Immigration and Ethnic Affairs.

72. The Committee recommends the appointment of a Council of fifteen constituted as follows:

- **Chairman** - appointed by the Minister for Immigration & Ethnic Affairs

- **3 members** - being senior second division officers appointed from each of the Departments of Immigration and Ethnic Affairs, Education, and Employment and Industrial Relations.

- **7 members** - being one representative of each of the States and the Northern Territory, selected in consultation with the appropriate State Minister and appointed by the Minister for Immigration and Ethnic Affairs.

- **4 members** - appointed from the general community by the Minister for Immigration and Ethnic Affairs.

(Recommendation 28)

PORTFOLIO

73. Although COPQ was established by and is responsible to the Commonwealth Minister for Immigration and Ethnic Affairs, its functions also relate to other portfolios of which the most relevant are Education, Employment and Industrial Relations, Foreign Affairs and Health. Two submissions suggested that the COPQ function would be more appropriate under another portfolio, one (158) suggesting Education, the other (353) Employment and Industrial Relations. However, there are compelling reasons for the Council remaining within the Immigration portfolio.
74. The issues surrounding recognition are complex, and while it may never be possible to resolve all under one portfolio, placement outside Immigration which has extensive experience of immigrants as a total client group may result in the special issues being subsumed by other considerations. While the Employment and Industrial Relations portfolio is concerned with employment issues, it has additional responsibilities in the area of manpower supply. The Committee is of the view that manpower supply should be clearly separated from the recognition of qualifications, so that potential conflicts of interest are avoided.

75. Recognition of overseas qualifications primarily concerns immigrants, and immigrant needs are most effectively and economically identified within a portfolio most intimately linked with immigrants, the Immigration portfolio. Indeed, facilitation of recognition of qualifications was a need first identified under that portfolio, and it is the Immigration portfolio which first saw fit to meet those needs by establishing COPQ in 1969. The Department applies some $3.3m annually to settlement activities separate from the $32.2m for the teaching of English, and a further $736 000 annually to the operation of COPQ, each a measure of some considerable commitment to the importance of settlement and recognition issues.

76. The Committee concluded that COPQ should have a sound collaborative and administrative relationship with relevant Commonwealth Departments (in particular the Department of Immigration and Ethnic Affairs) but should remain responsible to the Minister for Immigration and Ethnic Affairs.

77. Some submissions suggested that COPQ functions should be extended to encompass the trades while others argued it should not. The Committee, having carefully considered the idea that one body should cover the assessment of qualifications for all occupations, is opposed to it. COPQ's experience and expertise is in the professional and technical fields, and continued progress here could be endangered by adding responsibility for the trades. The experience in the trades has been gained by the Department of Employment and Industrial Relations (DEIR) and its predecessors, which have administered the Tradesmen's Rights Regulation Act since 1946. The Committee concluded that the assessment and recognition of trade and trade-related occupations should remain the responsibility of DEIR.

78. The Committee recommends that the scope of COPQ functions be overseas professional, sub-professional, technical and general academic qualifications and that COPQ remain responsible to the Minister for Immigration and Ethnic Affairs.

(Recommendation 29)
LEGAL STATUS

79. When COPQ was established early in 1969, it was not established by legislation, nor by the Governor-General in Council. It is not a body corporate.

80. In contrast to this position of COPQ, Commonwealth Central and Local Trades Committees are established, and their operations authorised, by the Commonwealth Tradesmen's Rights Regulation Act. Employer associations and trade unions submitted that the Act should be retained.

81. Initially it was not expected that COPQ would exist for any length of time. This has not been borne out in practice. After 13 years, even acknowledging significant achievements, the fact remains that, of the total task the bulk yet remains to be done. Accordingly, the Committee has recommended that COPQ should now be seen as a permanent part of Commonwealth Government machinery.

82. The scope of COPQ's work has extended over the years. Initially it was seen as a body which would obtain information for and advise existing registration boards and other assessing authorities. Today it is itself involved in assessing individual cases and in administering written and clinical examinations. In the Committee's view, the assessment of overseas qualifications by means of an objective national examination conducted by COPQ will develop to cover an increasingly large number of professional and other qualifications.

83. COPQ, feeling itself restricted by its own limited status, has encouraged and facilitated the incorporation of its own expert panels in medicine and physiotherapy. These will, it is understood, be followed by dentistry. These incorporated bodies conduct examinations, award certificates and charge and collect fees. The Committee does not favour COPQ establishing, and then losing control of, a number of separate, legally autonomous bodies to do what COPQ itself should be authorised to do.

84. On the results so far achieved by COPQ it is envisaged, in relation to assessment and recognition, that over time the measure of cooperation and national coordination will increase. Where agreement is reached between the Commonwealth and a State or States the need for Commonwealth legislation will arise in order to give effect to that agreement.

85. In the light of the foregoing, the Committee is of the view that the stage has been reached where serious consideration should be given to legislation for the establishment of COPQ and the authorisation of its operations. It is realised that this raises questions of policy and administration for the Government.

152
86. The legislation proposed should provide, amongst other things, for the protection of members of the Council and members of the staff of the Council against any action in relation to an act done or information given in good faith for the purposes of the Act. See, for example, section 25 of the Australian Science and Technology Council Act 1978.

87. The Committee believes that such legislation for COPQ would:

(a) enhance its standing and authority nationally and internationally;

(b) strengthen its position in dealing with Federal and State legally constituted registration boards and other authorities;

(c) establish its permanence as the Commonwealth Government authority to deal with the assessment of overseas qualifications;

(d) give authority for the conduct of examinations in Australia and overseas and the awarding of certificates to successful candidates;

(e) avoid the proliferation, profession by profession, of incorporated bodies to perform functions which should be conducted by COPQ;

(f) provide the means for the Commonwealth, at any time, to legislate for the recognition and registration of professional and other qualifications within its territories; and

(g) provide the means for the Commonwealth, with the agreement of a State or States, to legislate for the recognition and registration of professional and other qualifications.

88. The Committee recommends that COPQ be established by, and its operations authorised by, appropriate legislation.

(Recommendation 30)

RESOURCES

89. The cost of funding COPQ in 1981-82 was $736,079. In 1980-81 the figure was $675,808. These funds are, for the most part, provided as part of the appropriation of the Department of Immigration and Ethnic Affairs.

90. The 1981-82 figure represents a 9% increase over that of the previous year. The items accounting for most of the increase were:
Salaries and overtime | 1980-81 | 1981-82  
---|---|---
442,473 | 453,487
Rent | 35,495 | 41,489
Fees for services | 66,407 | 80,204
Examinations | 12,308 | 19,871

However, it is important to note that in areas critical to the work of COPQ less was spent:

Meetings | 95,426 | 95,365
Overseas investigations | 3,393 | 386

91. COPQ in its submission (371), in addition to providing a detailed account of its work, drew attention to the effect upon its work of limited resources:

(a) ... the Committee (COPQ) has so far established only eighteen expert panels. ... If resources were available and if the work were seen as important a great deal could be done by the Committee both to assist assessing bodies in disciplines not yet covered by expert panels and to improve existing procedures.

(b) The Committee (COPQ) has developed examination procedures in several professions and this is seen as a superior assessment technique. '...a much greater level of support in terms of money and manpower is required if the examinations are to be constantly reviewed and amended to keep them professionally sound and if examinations are to be made available in as wide a range of occupations as possible'.

(c) Since 1973 the number of individual cases submitted to COPQ for assessment has risen from 180 in 1973 to 9,700 in 1981. The case load has risen by 100% in each of the last two years. 'The resources currently devoted to the work are inadequate - delays of six months' duration are now common when an Australian embassy asks COPQ to assess the qualifications of a prospective migrant - and the improvement of assessing procedures in many professions is being deferred by the Committee for lack of resources'.

92. In subsequent consultations with COPQ further examples of the effect upon its work of limited resources were obtained:

(a) The number of meetings of each expert panel has been reduced thus delaying progress in the achievement of improved assessment procedures and causing long delays where an individual's case needs to be put to a panel meeting.
(b) COPQ has declined requests to extend its work to chiropractic and surveying and has yet to be involved in geology, law, quantity surveying and a range of occupations at the technician level.

(c) COPQ's publication of booklets for use in counselling prospective migrants lags well behind schedule due to lack of staff. Booklets should be up-dated each year but several are now many years old. New publications are not being produced.

(d) Research activities have almost ceased and adequate statistical records have become difficult to maintain.

93. In March 1982 a review of methods and procedures of the secretariat of COPQ was undertaken by a team of three officers from:

Public Service Board;
DIEA - Organisation Development Section; and
COPQ Secretariat.*

94. The major findings and recommendations of the Review Team are at paragraph 3.1 of their Report and include the following:

Despite ad hoc adjustments to the working organisation of the Secretariat and the high commitment of the staff, the Secretariat is unable to cope with its workload. There are some expert panels in which progress has been very slow and which create large workloads and there are panels for which there is no prospect of adequate service. The Secretariat should bring these facts to the Committee's attention.

The manual storage of information and examination materials is now inadequate, and there is considerable scope for installation of ADP storage and retrieval facilities.

95. The Review Team's conclusions are contained in paragraph 7 of their Report and were as follows:

7.1 The Secretariat is greatly stressed to meet its workload and has large backlogs in some areas. It is unable to efficiently respond to the rapid increases in workload using its current methods and procedures.

* See Attachment 4 Extracts from Review by COPQ, DIEA and the Public Service Board of Methods and Procedures of the Secretariat of the Committee on Overseas Professional Qualifications, Canberra, March 1982.
7.2 The change of emphasis in the Committee's Terms of Reference from 'establishment of' to 'operation through' expert panels has changed the purpose of the Committee, resulting in a continuing organisation with growing needs. Similarly the addition of assessments in sub-professional, technical, general academic and other qualifications has contributed to a situation of expansion which will require closer management and recording of workloads. The Secretariat needs to impress upon the Committee that it is restrained in its resources and cannot, under current circumstances, continue to expand its responsibilities.

7.3 The adoption of the Review Team's recommendations will produce savings in assessment turnaround, future staffing and future office accommodation. The replacement of manual office and information procedures by computerized storage is a matter for priority attention and the Review Team urges both the Secretariat and the Department to pursue this changeover.

7.4 Whilst this review has concentrated on methods and procedures, it has commented on establishment matters where these have been seen to have deleterious effects on adequate methods and procedures. Therefore some future establishment action will be required.

96. The Committee has set this information out in some detail both here and in Attachment 4 because it goes to the nub of the whole problem. Sufficient resources are not currently being provided for COPQ to do efficiently and promptly what it has been asked to do. Yet this Committee of Inquiry has concluded that immigrants are entitled to more assistance than currently available by way of counselling, bridging courses, improved examination procedures and right of appeal, all of which will obviously require further funding.

97. The Committee has concluded for all the reasons contained in the various chapters of this Report that the assessment and recognition of overseas professional qualifications should be accorded a higher priority in the allocation of resources. This is a cost which should be seen as making a significant contribution to migrant settlement and a benefit gained from the addition of overseas trained professionally qualified persons to the Australian workforce.

98. The Committee recommends that resources be made available to COPQ to enable:

(a) the implementation, as a matter of priority, of the recommendations and conclusions of the Departmental Review Team (March 1982) as to staff, equipment and future establishment; and
(b) the appointment of an enlarged Council, a part-time chairman, a chief executive officer of second division level and staff to assist in carrying out the additional functions proposed.

(Recommendation 31)
CHAPTER 11
GOVERNMENT STRUCTURES FOR THE ASSESSMENT AND RECOGNITION OF OVERSEAS-QUALIFIED TRADESMEN

INTRODUCTION

1. For persons with overseas trade qualifications, there is no central body in Australia which provides formal recognition in all the trades. Recognition is provided by a multitude of authorities administering Federal and State legislation. In some trades no formal recognition is possible. Generally the position is similarly fragmentary for persons trained in Australia but outside the normal apprenticeship scheme.

2. The metal, electrical and footwear trades are covered at the national level by the Tradesmen's Rights Regulation Act (TRRA) under which a tradesman's certificate may be issued to immigrants and persons trained in Australia but outside the normal apprenticeship scheme. In most trades, this certificate provides formal recognition for employment purposes. However, in some trades, there is other Federal and State legislation requiring the tradesman to hold a licence or certificate of registration or competency. This requirement may be for basic employment (electrical mechanic), specialisation (welder) or advancement (aircraft maintenance engineer). In such trades, evidence of a person's training or qualification, other than a tradesman's certificate, are required by the responsible authority.

3. In trades not covered by the TRRA, there is no formal machinery for the recognition of overseas qualifications. However, in a limited number of these trades, Federal and State legislation requires that tradesmen should be licensed, registered or certified for reasons of safety, health or consumer protection. Such legislation provides the avenue of recognition for tradesmen with overseas qualifications. Where the legislation applies, it is the key to employment.

4. In respect of the remaining trades, legislation has been introduced in New South Wales, Victoria, Queensland and South Australia to provide for the recognition of trade training and/or experience gained overseas or outside the apprenticeship system in Australia. This legislation is not yet fully implemented in all these States; South Australia has no immediate plans to implement its legislation. The Committee of Inquiry is unaware of any other States introducing similar legislation.

5. Immigrants and persons informally trained in Australia outside the apprenticeship system who cannot obtain any of these documents of recognition may be prevented from working in the trades concerned or may find that their opportunities for employment are restricted.
6. The Committee of Inquiry received a total of 445 submissions, of which 40 (9 per cent) were principally relevant to trade occupations. However, there were approximately another 90 submissions (20 per cent) relating to the assessment and recognition of overseas training and qualifications in the trade area. These were received from Commonwealth and State Government departments and authorities, private companies, other employers, employer associations, unions, ethnic community groups and individuals.

7. Throughout these submissions, the underlying theme is that standards should be maintained with recognition being based on the standards and range of skills of the Australian apprentice trained tradesman. The Committee believes that this is essential if the recognition process is to afford overseas applicants with accreditation and acceptance in employment equal to that of Australian trained tradesmen.

8. This chapter will be divided into three parts as follows:

- trades under the TRRA;
- trades not covered by the TRRA; and
- trades requiring licensing, registration or certification for reasons of safety, health or consumer protection which will be referred to as the licensed trades.

9. In reading the next two parts of this Chapter, it must be remembered that there are trades under the TRRA and trades not under the TRRA which fall into the licensed trades. From evidence received in submissions (for example 32, 132, 280), consultations and its own research, the Committee found that the issues arising from licensing, registration and similar certification procedures were generally common to the trades concerned whether covered by the TRRA or not.

TRADES UNDER THE TRADESMEN'S RIGHTS REGULATION ACT

10. The TRRA was enacted in 1946 to safeguard the employment and other industrial rights of the recognised tradesmen of the time. In 1952, the Act was extended to apply to immigrants who could provide proof of having similar skills. The origin and operation of the TRRA are given in detail in Appendix II.

11. In brief, the TRRA provides a national system under which a person who has not completed an Australian apprenticeship may achieve recognition as a tradesman in specified classifications in the engineering, boilermaking, blacksmithing, sheetmetal, electrical and boot trades only. Any person so recognised is issued a tradesman's certificate, which is accepted in industry throughout Australia.

12. The TRRA currently allows entry into the workforce of tradesmen in three groups, namely:
those who gain the skills of the trade informally on the job in Australia;

- ex-servicemen who have completed specified training while serving in the Australian Defence Forces; and

- immigrants who are suitably qualified by overseas trade training and/or employment experience.

13. The main avenue of entry into the workforce in Australia is formal apprenticeship. In industry, documents attesting completion of a proclaimed Australian apprenticeship and the TRRA tradesman's certificate have equal standing for national trade recognition purposes.

14. The Committee of Inquiry noted that in the 1981-82 financial year over 5000 certificates were issued to recognised tradesmen under the TRRA, the majority being issued to former immigrants. In more than 35 years of operation some 150 000 certificates have been issued under the TRRA, over 100 000 of which have been issued to immigrants.

15. The administrative costs of operating the TRRA include secretariat support for its Local and Central Trades Committees, meetings of these Committees, trade testing, the Technical Adviser Service and the Tripartite Missions. For 1981-82, the total costs were estimated to be approximately $1.3m.

16. Support in principle for the current powers, functions and structure of the TRRA was received from the submissions (189, 205, 240, 273, 399, 438, 439) and during consultations with union representatives. The Committee noted that the Queensland Government stated in its submission (296) that 'the Queensland Industry and Commerce Training Commission should be the body in the state responsible for assessing and recognising all tradesmen's qualifications in Queensland'. However, the Committee considered that this proposal would be a retrograde step leading to duplication of proven existing machinery and difficulties with the portability of certificates between States.

17. The Committee recognises that the TRRA has facilitated the entry of over 100 000 immigrants into the workforce by providing national recognition of their skills. It considers that the existing harmonious relationship has resulted from the involvement of the employers and unions through the tripartite administration of the TRRA leading to confidence in and support for the system. The Committee therefore recommends that the powers, functions and Committees under the TRRA be maintained.

(Recommendation 32)

18. The Committee found distinct differences in the requirements and practices for recognition and subsequent
employment in the professional and trades area respectively. Recognition in the trades applies to tradesmen trained in Australia as well as overseas. Consequently, the Committee recommends that the TRRA continue to be the responsibility of the Minister for Employment and Industrial Relations.

(Recommendation 33)

19. Despite the support in principle for the TRRA, a need for improvement in the administration of the Act was seen from all quarters (for example 154, 197, 240, 250, 357, 399, 438, 439).

Tripartite Missions

20. In order to allow applications from immigrants for recognition under the TRRA to be assessed accurately, Tripartite Missions have been sent to a number of countries since 1968 to investigate and report on vocational training and employment practices and standards of skilled workers in the metal and electrical trades. These Missions are composed of representatives from the Commonwealth Government, employer associations and unions. As a result, the Central Trades Committees under the TRRA have established assessment criteria for 35 countries (see Appendix II for a list). These criteria allow technical advisers overseas and Local Trades Committees in Australia to assess an immigrant's level of skill against the Australian standard. This procedure facilitates giving advice to applicants and processing their entry into Australia and the work force.

21. Entrants to occupational training in different countries have widely differing educational backgrounds and life experience. Further, it is rare for patterns of occupational education to be identical in different countries. Before evaluating the formal training systems in a country, the Mission compares the age, educational backgrounds and life experience of entrants to the overseas occupational training system with those of the average Australian apprentice. The formal training systems are evaluated by examining in detail the objectives of the courses, their duration, their syllabuses and the assessment procedures used and comparing these elements with Australian formal training. Where deficiencies occur in any of the foregoing, the Mission looks for offsetting factors.

22. In carrying out this evaluation, the Mission visits government training and/or educational authorities, government and private vocational and technical schools, training centres conducted by employers and/or unions, employer and union organisations and industrial establishments.

23. The Mission also examines the informal means by which people in overseas countries acquire skilled status. The
Missions have found that in all the countries they have visited, there are those who gain their skills of the trade informally on the job as do many applicants in Australia.

24. All formal training systems and informal means of acquiring skilled status are thus evaluated by the Missions in terms of their ability to produce skilled workers with knowledge, skill and experience at least approximately equivalent to that of the average Australian apprentice on completion of 4 years of apprenticeship. The Committee considers this detailed evaluation carried out by the Missions avoids any discrimination between countries in the resultant criteria.

25. In countries where no criteria have been established, applications for trade recognition for immigration purposes are referred to the Central Trades Committees for assessment. The expanding immigration program has led to a marked increase in these Committees' workload. In 1973 there were 170 cases from 29 countries while in 1981 there were 1083 cases from 58 countries. Of the cases considered in 1981, 92 per cent were new cases from overseas.

26. In submissions from the unions (438), the Department of Employment and Industrial Relations (DEIR) (399) and employer associations (205), the need for regular Tripartite Missions was stressed. The Amalgamated Metal Workers' and Shipwrights' Union, the Australasian Society of Engineers and the Electrical Trades Union of Australia in their joint submission stated that 'the heavy workload in assessing non-criteria cases makes it difficult for the Central Committees to keep up with their other essential policy work'. DEIR considered a regular program of Missions 'would significantly improve the service currently available to prospective migrants from these non-criteria countries'.

27. The workload of the Central Trades Committees could be reduced by establishing criteria in countries which are major sources of immigrants, provided the Technical Adviser Service is extended. This issue is covered in paras 63 to 68. An improvement in the assessment procedures both overseas and in Australia would result. The Committee therefore recommends that there be annual Tripartite Missions to countries which are sources of immigrants for the purpose of establishing criteria for recognising trade qualifications.

(Recommendation 34)

28. In the past, Tripartite Missions have been composed of a Commonwealth Government Chairman and Secretary and 3 Union and 3 Employers Association members. The 6 non-Government members are drawn from each of the 6 organisations represented on the Central Engineering and Electrical Trades Committees. These organisations have sought representation on Missions as a means of assuring their members that due consideration and proper
emphasis will be given to the industrial relations aspect as well as training matters to ensure that the recommendations of the Missions will be accepted.

29. The Committee believes that the cost of these Missions ($172,000 in 1980 for two missions and an estimated $132,000 in 1982 for the European mission) is offset by the smooth introduction of the immigrants into the workforce. Also, the published reports of these Missions provide a valuable source of information for Australian technical education and training, licensing and registration authorities.

Review of established criteria

30. Following the commencement of the Tripartite Mission program in 1968, any review of vocational training and employment practices on which assessment criteria were based has been carried out by the Technical Adviser Service. The technical adviser reports any changes to the Central Trades Committees which decide if a review is necessary.

31. Submissions (for example 205, 399, 438) pointed to the need to keep established criteria up to date. Technical advisers can then maintain a prompt and efficient service and the unions and employers will maintain confidence in the system. The Committee of Inquiry supports these views.

32. DEIR has indicated that, in the view of the Central Trades Committees, a number of the European countries visited by the Tripartite Mission in 1968 need revisiting. The United Kingdom, Denmark and Spain are included in the 1982 Mission but there are still other countries to be visited.

33. Recognising that the Central Trades Committees must be satisfied in respect of the review process, the Committee of Inquiry is of the view that a normal size Tripartite Mission (8 members) may not, in all instances, be necessary to review established criteria. It recognises the role that the tripartite structure has in maintaining industrial relations and confidence in the system. However, the Committee considers a smaller Mission (say 3 members), still tripartite in nature, could be satisfactory especially where the changes are identified in only one particular trade area. Alternatively the technical adviser may be able to carry out the necessary investigation on which Central Trades Committees may base a decision to update criteria.

34. The Committee recommends that the Central Trades Committees make recommendations on an annual basis to the Minister for Employment and Industrial Relations on suitable means of reviewing long established criteria.

(Recommendation 35)
Review of range of trades

35. The range of trades covered by the TRRA was fully reviewed and extensive changes were made following a joint conference of Central Trades Committees in December 1977. More recently, a review of the trades in the aircraft industry was completed and a review of the electronics trades has been scheduled for 1982. Changes are made to accommodate structural and technological changes in Australian industry.

36. The rate of technological change in a number of trades particularly in electrical and electronic instrumentation trades is well recognised and often leads to difficulties in matching skills acquired at different times and under different circumstances. Submissions received (for example 197, 438) supported constant review of the schedule of trades to allow for changes both in Australia and overseas.

37. The Committee considers that the schedule of trades should be adjusted to allow for technological changes so as not to inhibit the recognition process. It therefore recommends that sufficient resources be made available to the Central Trades Committees to allow the Committees to keep their schedule of trades under continual review to allow for technological changes.

(Recommendation 36)

Administrative delays

38. Applications for recognition of overseas trade qualifications under the TRRA are handled by technical advisers, Central Trades Committees and Local Trade Committees.

39. Technical advisers assess prospective immigrants' qualifications in countries where criteria have been established by the Central Trades Committees. Specific issues relating to the Technical Adviser Service are dealt with in paras 61 to 75.

40. The Central Trades Committees assess the trade qualifications of prospective immigrants from countries where criteria have not been established. DEIR indicated that this process whilst effective is somewhat slow because of the reliance on the transmission of documents to and from Australia, the timing of Central Trades Committee meetings and the number of applications. The average processing time after the application has been initially sent from the overseas post is currently 5 to 6 months for engineering trades.

41. The proposal of reducing the Central Trades Committees' workload by increasing the number of countries with established criteria was looked at in paras 25 to 27. The Committee also
considers that a review of the procedures and the allocation of resources or the introduction of new technologies and work methods could result in a reduction in the processing delays.

42. Local Trades Committees process all applications for tradesman's certificates within Australia. When particular problems arise, applications are referred to the Central Trades Committees. Applications from immigrants can be divided into 2 groups:

- assessment made prior to arrival in Australia, or
- no assessment overseas.

43. In the first group, the assessment of the trade qualification has been made overseas by a technical adviser or a Central Trades Committee. On arrival in Australia, the tradesman's certificate is normally issued within a week or two of application in the engineering and electrical trades in New South Wales and Victoria because the Committees meet as frequently as weekly. In other trades and States, there are longer waiting periods because the meetings are held less frequently.

44. The second group is composed mainly of family reunion migrants, dependents of migrants, New Zealanders and refugees. For immigrants whose qualifications meet established criteria or who are trained in countries where there is sufficient information about the standard and range of training, waiting periods similar to those for the first group apply. In other cases, where technical interviews, checking of authenticity and correct translation of documents, on-the-job inspections, and in particular trade tests, are required, the waiting periods can be longer.

45. Where there are delays in assessing applications, the secretariats of the Local Trades Committees are willing to advise employers by telephone or letter that the application is being processed. The Committee has been advised that this procedure enables most applicants to gain employment while their applications are being considered. Nevertheless, submissions (for example 154, 240) were received claiming that delays lead to periods of unemployment and other settlement problems.

46. Submissions (for example 154) pointed to a high workload and understaffing as a cause of the delays. In 1980 the Local Trades Committees received 6389 applications. The Committee noted that immigrants not previously assessed as tradesmen overseas may lodge subsequent applications if their first attempt fails which can add to the workload.

47. The Committee considers that there are only undue delays in processing applications where immigrants' qualifications are not assessed overseas, do not meet criteria or there is insufficient information. The delays caused by the various
administrative processes can then cause unemployment and consequent anxiety which considerably delay the settlement process. This is despite the secretariats of the Local Trades Committees being prepared to advise prospective employers that processing of the applications is under way.

48. **The Committee therefore recommends that the delays in processing applications by the Central and Local Trades Committees be kept under review and procedures, new technologies and work methods, together with allocations of resources be examined where necessary. The Minister for Employment and Industrial Relations should arrange for such a review to be undertaken.**

(Recommendation 37)

**Trade testing**

49. Trade tests are used where necessary to provide additional information in the assessment of an applicant for a tradesman's certificate. Where the Local Trades Committee or the technical adviser is not satisfied of the applicant's ability to perform the work of a tradesman in Australia, a trade test is requested. In Australia in 1980, 20 per cent of applicants were obliged to undergo trade tests before a decision could be made.

50. In Australia, the Local Trades Committees do not have trade testing facilities of their own but use the facilities of independent authorities, usually Colleges of Technical and Further Education (TAFE). In 1981-82, these facilities cost $16,245 but costs are expected to rise to $26,000 in 1982-83 as more States charge for their facilities. In 1980, 1300 persons including Australian civilians and ex-servicemen, attempted trade tests - 824 (63 per cent) were granted tradesman's certificates following the tests. There is no charge made on an applicant who is granted a trade test and there is no limit on the number of tests any such applicant may be granted.

51. When trade tests were first introduced, the Central Trades Committees set the tests. However, over the years, these test arrangements have become varied in the content and the methods of reporting assessments in different trades and between States. This has been brought about by the reliance on independent authorities (currently approximately 160 testing places), the number of classifications involved (approximately 70) and new tests being introduced for new classifications on a local basis.

52. A number of submissions (for example 197, 265, 335, 438) included reference to variation in the standard of trade tests between States and in the stringency applied by the States. A more uniform approach, and in some cases, a more rigorous approach was recommended. The Broken Hill Proprietary Company
Limited saw the variation in standards leading to some tradesmen holding tradesman's certificates for skills for which they were inadequately trained.

53. DEIR stated in its submission (399) that the basis of trade testing for TRRA purposes is that

the test should examine some of the key basic skills of the trade and that it should be of such a standard that an average apprentice about to begin his final year could be expected to pass the test.

DEIR is aware that all tests do not meet this standard; in some cases, tests are of a higher standard. However, a lack of resources has prevented much work being done in this area. Recently two officers have been temporarily assigned to look at the size of the problem, and trade testing in general. The Department advised that more resources will be required before the tests can be made uniform and adequate in Australia and overseas.

54. The Committee realises the importance of having uniformity in content, standard and assessment of trade tests. They are used as part of the assessment process for the issue of tradesman's certificates. Non-uniformity between States could lead to a lack of confidence in the standard of the skills of the certificate holder. It is also important that the tests adequately reflect the current requirements of each industry. The Committee recommends that the Central Trades Committees:

(a) establish, for each trade, uniform trade testing arrangements using a suitable range of tests; and

(b) regularly review the standard, content and range of trade tests (together with the method of reporting assessments) to take account of current requirements of each industry in each trade and to ensure that the tests remain fair, valid and reliable.

(Recommendation 38)

55. The Committee recognises that any review of trade testing arrangements is a large and ongoing task and cannot be undertaken without adequate resources. It recommends that the Minister for Employment and Industrial Relations arrange to have made available the necessary resources to allow this ongoing task to be undertaken.

(Recommendation 38)

56. Limited use is made of trade testing overseas as practical difficulties have prevented its use in many countries. These difficulties include countries not making facilities available and the Technical Adviser Service not
having sufficient resources to organise the tests. At present trade testing facilities are in regular use only in Italy and the Netherlands.

57. It was suggested in a number of submissions (for example 240, 399, 438) that more trade testing should be done overseas. They can provide reliable additional information which would assist the technical adviser to make a more accurate assessment in borderline cases. The Central Trades Committees and its secretariat have long standing plans for such an improvement but 'implementation... is subject to Government priorities in the allocation of resources' (399).

58. The technical adviser, in making his assessment of a prospective immigrant's trade qualifications, should have available as much information as possible. In Australia, the trade test is used as additional information where doubt exists. The Committee considers that applicants overseas should have the same opportunities as applicants in Australia and recommends that trade testing facilities be made available overseas wherever practicable.

(Recommendation 39)

59. Trade testing is used quite extensively in Australia with refugees who may not have documentary evidence of their qualifications. The Committee recommends that this facility be available, where feasible, to assess refugees in transit countries.

(Recommendation 40)

This would enable refugees to know their level of skill before arriving in Australia. The processing delays in Australia would then be reduced, allowing the refugees to enter the workforce in their appropriate trade more smoothly and with minimum delay.

60. The Committee notes that DEIR in response to strong representations made by Central Trades Committees, has under consideration an approach to the Austrian Government seeking the introduction of trade testing. The Committee supports this move. Governments in transit countries such as Austria should be encouraged to provide suitable testing facilities, as the assessment assists in the processing of refugees.

Technical Adviser Service

61. The role of the technical adviser overseas is given in detail in Appendix II. The primary function of the technical advisers is to evaluate the qualifications, training and experience of prospective immigrants in the metal and electrical trades and to determine their eligibility for recognition under the TRRA. Technical advisers visit all the countries with criteria to assess prospective immigrants' trade qualifications and provide a counselling service. They also have the responsibility of monitoring and reporting on changes
and developments in the training of skilled workers in these
countries so that Central Trades Committees can assess whether
any changes are necessary in the criteria or whether the
country should be revisited by a Tripartite Mission. To
perform these functions, a technical adviser must be a
recognised tradesman in one of the TRRA trade classifications,
have a thorough knowledge of Australian trade classifications,
trade practices and Australian industry and have the confidence
of the Central Trades Committees.

62. In 1982, there were 14 officers overseas in the
Technical Adviser Service covering 40 countries. The extent to
which technical advisers carry out work directly related to the
TRRA trades as distinct from other general migration duties
varies from post to post. The estimated cost of this work is
approximately $450 000 per annum provided by the Department of
Immigration and Ethnic Affairs (DIEA).

63. Submissions have been received from unions (438) and
from the Central Trades Committees through DEIR suggesting that
the administration of the Technical Adviser Service by DIEA has
not resulted in optimum performance of the functions of
technical advisers that relate directly to the operation of the
TRRA. The Central Trades Committees have expressed the firm
opinion that the Technical Adviser Service should be part of
DEIR. The Central Trades Committees have also expressed the
firm opinion that the efficiency of the Service and hence the
recognition process would improve with an increase in the
number of technical advisers.

64. The question of the placement of technical advisers was
raised with the Committee of Inquiry. It was suggested that
when a technical adviser was not located in a particular
country that was a major source of immigrants, the result was
that prospective immigrants with trade skills were discouraged
from applying.

65. As mentioned, there are currently 14 technical advisers
covering 40 countries, compared with 18 technical advisers in
1973 covering 19 countries. It is significant that in 1981
there were over 5000 tradesman's certificates issued in
comparison with less than 4700 in 1973 and that the proportion
of applicants who were selected by technical advisers and who
received certificates in 1981 was greater than that in 1973.
This decrease in the number of technical advisers and increase
in area of responsibility and workload have contributed to
delays of up to 12 months in the processing of applications.

66. The Committee notes that specific aspects of the
Technical Adviser Service were reviewed in 1981 by a joint DEIR
and DIEA working party. As a result, it was proposed that the
functions of migration officer and technical adviser in some
locations should be amalgamated 'to facilitate the
classification of TRRA applications and minimise office
resource requirements'. DIEA and DEIR were to meet every 6
months to review the location and areas of responsibility of technical advisers and technical migration officers and the Tripartite Mission program.

67. The Committee also notes that subsequently Central Trades Committees having expressed strong reservations, made representations to the responsible Minister that no further steps be undertaken until a comprehensive review of the Technical Adviser Service was undertaken. The Minister for Employment and Industrial Relations has included in the terms of reference of the 1982 Tripartite Mission to Europe a review of the Technical Adviser Service.

68. The primary role of the technical adviser is to facilitate the operation of the TRRA overseas and subsequently in Australia. It is important that this role is maintained for the efficient operation of the TRRA. The Committee recommends that DEIR and DIEA, in consultation with the Central Trades Committees, review the control, role, functions and geographic placement of the Technical Adviser Service following the 1982 Tripartite Mission to Europe.

(Recommendation 41)

The review should ensure that, in providing the optimum service, the technical advisers give appropriate priority to:

- TRRA related occupational assessment and classification work; and
- regular investigatory, updating and reporting of information on vocational education, training and employment developments in criteria countries.

69. Submissions were received from individuals (297) and on behalf of individuals (211, 295) who were not made fully aware of the implication of licensing, that is they may be unable to work in their trade for 12 months while they became licensed. The submissions indicated that this concern could be avoided if prospective migrants were counselled on the full implications of licensing.

70. The Committee considers that it is important that the technical adviser has the opportunity, time, resources and where necessary, technical interpreter services to provide adequate direct counselling of any prospective immigrant or refugee on his or her employment prospects and conditions and other procedures, such as licensing, which may be required for employment at the level desired by the prospective immigrants. To some immigrants, licensing of tradesmen is a completely new concept which needs to be explained carefully to avoid misunderstandings.
71. The Committee therefore recommends that optimum service by the technical advisers should include the counselling of immigrant applicants and refugees on recognition and on employment prospects and conditions and other requirements such as licensing.

(Recommendation 42)

72. Central Trades Committees expressed concern that in many instances, technical advisers were not provided with the time and resources to make investigatory visits to countries with no established criteria. Only two such investigatory visits have been made in recent years, one being to Chile, which was subsequently visited by a Tripartite Mission, and the other to Israel. Such investigations greatly assist Central Trades Committees in assessing applicants from such countries and in determining the need for and in planning Tripartite Missions.

73. Other submissions (for example 156) expressed concern that lack of knowledge on training and employment arrangements placed immigrants from countries for which no criteria had been established at a disadvantage.

74. The Committee recognises the fact that an assessment of an immigrant's qualifications can be made more accurately and effectively if information is available on a country. This in time improves the service to the immigrant. The investigatory visits, apart from providing a good basis for planning future Tripartite Missions, supplement the overall information base on immigration source countries.

75. The Committee therefore recommends that technical advisers make investigatory visits to significant immigrant source countries for which no criteria have been established to study and report to the Central Trades Committees on vocational education, training and employment arrangements. These visits should be planned and conducted in co-ordination with the program of annual Tripartite Missions.

(Recommendation 43)

Co-ordination of trade recognition and licensing procedures

76. In its investigations, the Committee found that a number of electrical licensing authorities did not recognise the tradesman's certificate in their assessment procedures even for the most basic form of licensing. In some cases, the licensing authority requires examination of trade theory as well as understanding of the application of the Standards Association of Australia (SAA) wiring rules and related regulations. These authorities, in particular, do not accept recognised tradesmen who have not passed formal training courses in electrical work.

77. The Australian Welding Institute in its submission (265) indicated that the Examining Authorities for welding accept various known overseas welding qualifications for the issue of
specific welding certificates. Holders of these qualifications can be exempted from all or part of any examination. However, there is no uniform approach. The Institute believed that agreement on acceptance of overseas welding qualifications would obviously lead to the omission of duplication of examination and would lead to more efficient utilization and assimilation within the industry workforce.

78. Other submissions (for example 14, 295) were received supporting closer liaison between Committees operating under the TRRA and licensing authorities.

79. The Committee considers that any duplication or lack of co-ordination in assessing procedures places undue delays and pressures on immigrants trying to enter their occupation at an appropriate level and settle in Australia. It can also slow the entry of immigrants into trades where there is a labour shortage, thus defeating the purpose of selecting some immigrants to fill labour shortages. The Committee recommends that the Central Trades Committees with the co-operation of Commonwealth and State governments and the relevant licensing authorities or co-ordinating bodies examine the trade recognition and licensing, registration or certification procedures with a view to removing any inconsistencies. The uniform acceptance of known overseas qualifications should also be examined.

(Recommendation 44)

80. In other instances where the tradesman's certificate is recognised in licensing procedures, a certificate holder may still have to meet additional requirements before being licensed. These include understanding the SAA wiring rules and related regulations, having a sufficient command of English to be able to work safely and completing a specific experience requirement.

81. The Committee considers it is important that an immigrant is made aware of additional licensing requirements, whether licensing may be required for employment at either the basic level or a more advanced level. As indicated in para. 69, immigrants believe they would be able to accept delays, provided they were made fully aware of requirements.

82. The Committee is of the view that where these requirements cannot be incorporated in the assessment procedure overseas, a prospective immigrant should at least be fully informed on these requirements and their effects on his employment prospects. It recommends that up-to-date written explanations of licensing requirements and procedures and their effects on employment prospects be provided to prospective immigrants in their own language and that procedures be instituted to obtain from persons accepted for migration in licensed trades, written acknowledgement that they received and read these explanations.

(Recommendation 45)
Advisory role for TRRA Committees

83. Under the TRRA, the Central Trades Committees determine the assessment and recognition policy under which the Local Trades Committees and the technical advisers operate. They also have an assessment role of their own. Included in Section 34 of the Act there is a provision which states that 'the powers and functions of the Central Committee are ... to advise the Minister generally with respect to any action considered necessary to give effect to this Part.' This role has only been applied to assessment and recognition and has generally not extended to advising the Government on the administration and machinery. The time involved on the assessment role has precluded any opportunity to act in this advisory capacity.

84. In the joint submission (438) from, and in consultations with the Amalgamated Metal Workers' and Shipwrights' Union, the Australasian Society of Engineers and the Electrical Trades Union of Australia, it was submitted that periodic joint meetings of Central and Local Trade Committees in the different States would result in better liaison and continuing improvements to machinery as well as its uniform application. Conferences of members and officers of Central and Local Trades Committees also are significant in developing and updating policies, practices and procedures under the TRRA.

85. Joint meetings and conferences do take place but the unions and the members of Central Trades Committees believe it is not with sufficient frequency to be fully effective. The last conference was held in 1977 and resulted in a large scale review of the trades covered by the TRRA.

86. The Committee considers that joint meetings of the Central Trades Committees, together with more liaison between the Local and Central Trades Committees, would allow common policies to be devised on major issues covering administrative, procedural and functional aspects of the TRRA system. It is recommended that Central Trades Committees report regularly to the responsible Minister on all aspects of the TRRA machinery in order to maintain its efficiency.

(Recommendation 46)

Annual report

87. With any assessment and recognition body, the Committee is of the view that its activities should be made public. The most appropriate method is through an annual report. It should contain both a resume of the body's activities during the year together with a report and recommendations on any deficiencies or improvements which may be seen as necessary.

88. The Committee notes that the annual report of DEIR contains a section on the operations of the TRRA. However, it is recommended that as the TRRA is a separate statute
administered by the Central Trades Committees, they should jointly produce an annual report on the Act's operations including the operations of the Technical Adviser Service.

(Recommendation 47)

Right of appeal

89. There are a number of features of the machinery of the TRRA which facilitate review of the claims of any applicant whose application for a tradesman's certificate is not granted. The first feature is that an applicant can reapply without limit and the Local Trades Committee will reconsider each new application on its merits. Counselling is available on the matter. The second feature is that the Chairman of the Local Trades Committee or any member of the Committee has the right to refer the application to the Central Trades Committee. The third feature is that where an applicant feels an appeal is warranted following a decision by a technical adviser or a Local Trades Committee, the applicant can make a direct written appeal to the Central Trades Committee or he can request his parliamentary representative or similar representative to do so. The fourth feature is that a Local Trades Committee may, with the approval of the Central Trades Committee, grant probationary tradesman status which is explained in paras 92 and 93. The decision made by the Central Trades Committee is final although a further appeal with additional evidence would be considered on its merits.

90. Outside the TRRA machinery agencies such as State Ethnic Affairs Commissions are available to counsel and assist applicants in the preparation of new applications.

91. The Committee considers that the avenues for appeal are adequate but suggests that technical advisers, Local Trades Committees and Central Trades Committees ensure that all applicants for assessment and recognition under the TRRA are aware of the avenues for appeal.

Probationary tradesman status

92. Probationary tradesman status may be offered to certain applicants for tradesman's certificates who do not quite meet the requirements of the TRRA. This provision allows Local Trades Committees a greater flexibility of response to special cases. The following determination approved by the Minister for Employment and Industrial Relations pursuant to Section 34(1)(b) of the Act embodies the principles agreed by the Central Trades Committees. Determination 1 of 20.12.77 of the Central (Engineering Trades) Committee states:

If a Local Committee is satisfied that a person has successfully completed a period of employment and/or training as a probationary tradesman it may grant to that person a tradesman's certificate.
A Committee may, subject to the approval of the Central Trades Committee, recognise a person as a probationary tradesman where that person has had training and experience in a trade and could, within a period not exceeding 12 months, acquire skills necessary for the performance of work ordinarily performed by a recognised tradesman in a trade to which the Act applies.

93. A number of applicants have been granted status and become recognised tradesmen. The provision has not been widely used. In 1980, 21 persons were approved as probationary tradesmen. This may reflect the fact that the TRRA requires that:

The employer of a probationary tradesman shall pay him at a rate not less than the rate of the wage prescribed by the appropriate award, order, determination or industrial agreement for adult males employed in the trade in which he is authorised to be employed.

94. The Amalgamated Metal Workers' and Shipwrights' Union, Australasian Society of Engineers and the Electrical Trades Union of Australia in their joint submission (438) supported the development of subsidy arrangements to make the probationary tradesman concept a more practical proposition.

95. The Committee notes that wider use of this provision perhaps in conjunction with more comprehensive trade tests of a diagnostic nature, could be of value to immigrants as it has some of the potential advantages of supervised employment, discussed in paras 124 to 126. The Committee recommends that the Government give consideration to providing practical assistance to encourage greater use of probationary tradesman status arrangements.

(Recommendation 48)

TRADES NOT COVERED BY THE TRADESMEN'S RIGHTS REGULATION ACT

96. Apart from the licensed trades, there is little machinery established to recognise training or qualifications if the tradesman has not completed an Australian apprenticeship. New South Wales, Victoria and Queensland have introduced legislation to cover the recognition of tradesmen with training and experience gained outside the Australian apprenticeship system either in Australia or overseas. In South Australia, legislation has been introduced but there are no immediate plans to implement it.

97. Consequently for those trades outside the licensed area, recognition is left to the market place. The employer decides whether a tradesman's training and experience are suitable for his needs. Union membership may also be a requirement for employment.
Overseas, when it is necessary to assess a prospective immigrant's qualifications, training and experience for immigration selection purposes, any assessment is normally carried out by the migration officer although technical advisers may assess trades not under the TRRA to the extent that their TRRA workload allows. Reference is made to DEIR's 'Occupational Demand Schedule' and its publications 'Worker Requisition Categories' and 'Employment Prospects by Industry and Occupation'. 'Worker Requisition Categories' which was published in 1974 provides only a basic description of a limited number of occupations to assist in the occupational classification processes. A new classification, the Australian Standard Classification of Occupations, is currently being developed by DEIR and the Australian Bureau of Statistics. This is a long term project and will provide many more occupational descriptions.

One of the main issues raised in a number of the submissions was assessment and recognition machinery for trades in this group. However, opinions varied. There were submissions supporting in general terms an assessment facility (for example 159, 224). The submission (337) from the Commonwealth Public Service Board stated that 'any move to provide an assessment facility to cover such trades would be supported'. Others were more specific supporting an extension of the TRRA either through extension of the Act itself (for example 290) or by the Commonwealth acting as an agent for the States (for example 439, 442) through State legislation. Some submissions (for example 296, 353) thought the State Industrial Training Commissions should be involved.

On the other hand, there was support for the status quo. DEIR in its submission (399) stated:

Further, from its own experiences as regards other trade occupations where informal recognition practices prevail, it appears that the existing arrangements for de facto recognition by either or both employers and unions are generally adequate and there does not appear to be any significant or clearly demonstrated need for the establishment of more formal recognition arrangements.

This view was supported by a number of employers (for example 118, 284, 341) who had not experienced any serious difficulties with overseas trade qualifications.

The Committee is of the view that the current ad hoc arrangements with employers and unions are working satisfactorily. No submissions were received from individuals who had experienced difficulties. In the 5 years to 30 June 1982, 20 466 skilled tradesmen in trades not covered by the TRRA have arrived in Australia as permanent settlers. This was over half of the total number of skilled tradesmen arriving in this period. The figure does include tradesmen in the licensed trades.
102. However, some of the States have taken the initiative to provide for the introduction of systems of trade recognition for trades not covered by the TRRA. If these are implemented and/or continue to operate without any national co-ordination, the criteria and procedures used may not be uniform and the certificates issued may not be recognised in other States. Further, these recognition arrangements do not provide for the assessment of the qualifications of potential immigrants prior to their departure from overseas countries.

103. The Committee therefore recommends that a committee, named the Trades Recognition Co-ordinating Committee (TRCC), be established by the Minister for Employment and Industrial Relations to provide co-ordination at the national level for trades not covered by the TRRA. (Recommendation 49)

104. Before recommending a new committee, the Committee looked at the various councils and committees which are administered by DEIR. These included the Commonwealth and State Apprenticeship Committee, the National Committee on Discrimination in Employment and Occupation, the National Training Council and the National Labour Consultative Council. The Committee considered that the functions and/or operations of these bodies were not appropriate to meet the needs specified in para. 102.

105. Details of the structure, role and functions recommended for the TRCC are listed in paras 132 to 134, as the Committee also sees the TRCC having a role in the licensed trades.

106. The Committee noted that there were significant benefits for overseas applicants where assessment of their eligibility for recognition as tradesmen in Australia was provided prior to their departure from their countries of residence. These benefits are already provided through the TRRA machinery of technical advisers and Central Trades Committees. The Committee concluded that the TRCC should examine procedures for providing assessments in trades not covered by the TRRA and this has been included in the functions of the TRCC recommended in para. 132.

107. The Committee has noted that training policy in a wide range of occupations including the skilled trades is considered at the national level at meetings of the Commonwealth Minister for Employment and Industrial Relations and State Labour Ministers. Recommendations to the Ministers come from their Departmental heads meeting as the Departments of Labour Advisory Council (DOLAC). Issues such as national standards for apprenticeship training and the co-ordination of training provided by employers and vocational education provided by TAFE colleges may be dealt with by the formation of special working parties or by reference to the Commonwealth and State Apprenticeship Committee (COSAC) which is controlled by DOLAC.
108. COSAC undertakes tasks to assist in the more uniform administration of State apprenticeship training systems and is currently working towards integrating off-the-job and on-the-job training with a view to improving the overall efficiency of trade training. A working party has been established to develop proposals for a co-ordinated national approach to the development of such training programs for each trade. Representatives of the Technical and Further Education Council (TAFEC) attended the 1981 COSAC meeting to discuss the further promotion of the development of national core curricula for use in TAFE colleges.

109. The Committee has noted the developing national cohesion in the States' TAFE systems which play such a significant part in the setting of standards for the trades and in training tradesmen. The work of TAFEC at the national level has made a major contribution to co-ordinating the policies and practices of TAFE and in particular has been responsible for setting up the TAFE National Centre for Research and Development Ltd. Task forces have been established for the development of national core curricula in the following areas:

1. fitting and machinery trades
2. electrical trades
3. plumbing trades
4. automotive mechanics trades
5. sheetmetal trades
6. metal fabrication/welding trades
7. business studies/accounting certificate (middle level).

110. The Committee of Inquiry commends the efforts of all these bodies in working towards national standards in the trades area as these are important in providing the basis for the assessment and recognition of overseas trade qualifications.

LICENSED TRADES

111. Licensing has been introduced in a number of the trades for reasons of personal and public safety and health and for consumer protection of persons and property. The licensing provisions are covered by Federal and State legislation. Federal legislation leads to uniformity as between States but only covers a very limited number of trades such as aircraft maintenance and ships engineers. State legislation covers a wider range of trades but not uniformly. For example there is legislation in all States to cover electrical mechanics and plumbers, whereas for hairdressers, legislation only exists in 5 States. Some licensing arrangements only apply in a single State, for example the motor vehicle trades in New South Wales, and in part of a State, for example registration of hairdressers in South Australia is confined to the Adelaide metropolitan area only.
112. Submissions were received from a number of the licensing authorities (for example 47, 56, 108, 132, 345) giving details of their procedures. Other submissions (for example 292) pointed to a need for a central information point. Further submissions (for example 96) raised the problem of the portability of licences between States. A number of specific issues were also raised. These will be covered in paras 118 to 130.

113. The Committee made a detailed study of the licensing arrangements and procedures for electrical workers, plumbers and hairdressers. Details are given in Appendix III, IV and V. In its studies, the Committee found that there were variations between the States in a number of aspects of the licensing procedures, such as examinations and acceptance of overseas qualifications, apart from a variation in the levels of licensing available.

114. Generally, recognition of some form exists between the States where licensing exists. However, the variation in licensing arrangements can lead to some problems in portability of licences. These problems have been relieved in some trades by the voluntary formation of co-ordinating committees or associations composed of representatives of the various authorities responsible for the licensing arrangements.

115. The Committee held consultations with representatives of two co-ordinating bodies; the Australia - New Zealand Reciprocity Association, which covers the plumbing trade, and the Regulatory Authorities Licensing Committee covering the electrical trades. Both these bodies have achieved some degree of uniformity in their State systems and procedures but see a Federal co-ordinating role as being necessary; especially in respect of overseas qualifications and immigrants.

116. Conditions and problems experienced in Australia are not necessarily the same as in the immigrant's home country. The Committee recognises that it is therefore important, especially for health and safety protection, that procedures established for licensing allow the relevant authorities to establish the tradesman's competence if not already established (for example TRRA tradesman's certificate), and his knowledge and understanding of local rules and regulations and where necessary, the English language.

117. The Committee also considers it important that the licensing systems and procedures be uniform; the acceptance of overseas qualifications be standard; and that portability of licences exists between States. However, national co-ordination would be necessary to achieve this. The Committee therefore recommends that the role of the TRCC also cover the licensed trades.

(Recommendation 50)

Details of the proposed terms of reference and the membership of the TRCC are given in paras 132 to 134.

179
Licensing examinations

118. In its research and from submissions, the Committee found that in general, licensing procedures for various occupations include the requirement of passing a licensing examination. However, within the same occupation, the standard, content (knowledge of trade or local regulations and codes), and structure (written, practical and/or oral) of the examination and conditions for exemption from or eligibility for examination are not uniform between the authorities. In some cases, it is compulsory to attend a trade course prior to attempting the examinations. However, one submission (295) has claimed that a tradesman from overseas did not learn any more during one of these courses than he had during his apprenticeship.

119. Some overseas qualifications, training and experience will exempt a tradesman from sitting for whole or part of a licensing examination. However, the investigation by the Committee revealed that within an occupation, certain qualifications will be accepted in one State but not in another. For example the licensing authority for electrical mechanics in New South Wales recognises qualifications from approximately 20 countries whereas, in Victoria, none is accepted. In hairdressing, the Victorian licensing authority recognises an overseas apprenticeship with proof of formal training whereas, in New South Wales, all persons with overseas qualifications are required to sit for the licensing examination.

120. The Committee recommends that the TRCC give priority to a review of the State licensing procedures with a view to establishing national uniformity within occupations in assessment procedures, examinations and recognition of overseas qualifications.

(Recommendation 51)

Counselling

121. Licences are required in a number of occupations for safety or health reasons. Work in these occupations can involve needing to know local codes, regulations and by-laws, a knowledge of which will be required for a licence. It is also important that these tradesmen communicate effectively with each other, inspectors and the general public. For this reason, proficiency in English is required although the level will vary from occupation to occupation. Submissions (for example 132) were received from a number of licensing authorities stressing the need for some knowledge of English. In some cases proficiency in English is tested directly either in conversation or by asking a person to read a passage from a manual but in general it is tested indirectly by requiring all
examinations, whether written, practical or oral to be completed in English. Limited use is allowed of interpreters or dictionaries.

122. Submissions (for example 295, 297) were received pointing to the settlement problems which arise because prospective immigrants were not fully aware of the procedures and requirements for licensing. These immigrants, sometimes in trades where a shortage has been identified, could not be fully utilised on arrival in Australia until their English reached a suitable level and a knowledge of the required rules etc. was gained.

123. The Committee recommends that licensing authorities, through the TRCC, liaise with DIEA on the selection process for prospective immigrants in the licensed trades to ensure that:

- prospective immigrants receive full counselling and written information on licensing and registration requirements and procedures; and
- prospective immigrants have an opportunity to begin learning technical English and preparing for licensing and registration examinations prior to their departure.

(Recommendation 52)

Any information should indicate where emphasis is placed on knowledge of English (and what level), local codes, rules or regulations (for example SAA wiring rules for electricians) and where Australian trade practices stem from the use of higher voltages or the effects of different climatic conditions. Licensing is a new concept to many migrants.

Supervised employment

124. Where the applicant's personal safety is not jeopardised, both individuals (for example 1) and the relevant authorities (for example 32, 132) have indicated that applicants benefit from a period of supervised employment, prior to any examination. It allows applicants to gain practical familiarity with local conditions. The Committee recognises that the conditions for this employment need to provide a balance between the interests of the employee, the employer, the general community and the relevant authority. Reports on the applicant's performance during such periods of supervised employment should be considered as additional information in assessing the applicant's eligibility for the issue of a licence or a certificate of registration or competency.
125. Submissions (for example 127, 295) received indicated that supervision requirements at times led to difficulties in gaining employment. In a number of the trades, employers particularly in small firms are reluctant to employ a person who needs another's supervision. This is more so in times of economic difficulties.

126. Authorities such as Electricity Supply Authorities and Water Supply and Sewerage Authorities are generally employers of large numbers of tradesmen. In some cases the authorities may not be able to provide work which directly provides experience for licensing, for example work with some Electricity Supply Authorities is not relevant to normal wiring rules, but at least the immigrant is gaining local experience in the trade. Alternatively, the authority should have a good knowledge of the trade and hence employers who may be able to assist in the provision of supervised employment. The Committee recommends that the responsible licensing authorities assist applicants in Australia or prospective applicants overseas to find suitable employment when the applicant is likely to experience difficulty in finding supervised employment.

(Recommendation 53)

Reorientation courses

127. The Committee was pleased to find that courses were generally available for overseas persons to learn about the local codes and practices and variations in technology and to refresh their knowledge on the areas in which they may not now be familiar. Details of courses available to migrants in the electrical, plumbing and hairdressing trades are given in Appendix III, IV and V. However, it is important that the need for reorientation programs is continually reviewed to ensure that any demand, whether from immigrants or other Australian residents, is satisfied.

Right of appeal

128. Any appeals on licensing decisions are generally effected through the State Ombudsman or through the Chief Officer or Minister of the Department responsible for the licensing authority. There are also provisions in some of the licensing legislation for appeal against any decision of the licensing authorities through the State law systems, generally a stipendiary magistrate.

129. The Committee considers that it is important that applicants for licences are fully aware of their rights. It recommends that the licensing authorities make applicants fully aware of the avenues of appeal open to them following any decision regarding their application for a licence.

(Recommendation 54)
Statistical information

130. In examining the licensed trades, the Committee found that there was a marked lack of statistical information readily available on applicants with overseas training and qualifications. This prevented the Committee from quantifying any of the problems in this area. The Department of Technical and Further Education in South Australia has experienced similar problems. The Committee recommends that licensing authorities compile on a regular basis statistical information on applicants with overseas training and qualifications to allow them to look at their procedures objectively and to assist authorities in planning English and technical courses for migrants and refugees.

(Recommendation 55)

TRADES RECOGNITION CO-ORDINATING COMMITTEE

131. As set out in paras 103 and 117, the Committee has recommended that the TRCC be established by the Minister for Employment and Industrial Relations to deal with the trades not covered by the TRRA and the licensed trades.

Terms of reference of the TRCC

132. The Committee recommends that the TRCC be given the following functions:

(a) determine priorities and needs for portability and/or national recognition of qualifications in specific trades or groups of trades;

(b) seek the co-operation of State licensing and training authorities in achieving national consistency in licensing and trade recognition arrangements;

(c) liaise with the Central Trades Committees where licensed trades are under the TRRA to ensure that trade recognition and licensing procedures are closely co-ordinated and duplication of processing avoided;

(d) gather information in the trades not covered by the TRRA on vocational education, technical training, employment and recognition arrangements, together with general licensing arrangements in overseas countries;

(e) provide a central source for information on licensing and recognition of qualifications in trades not covered by the TRRA;
(f) co-ordinate and develop as necessary and with the agreement of the States and Territories, arrangements for the assessment of individual applicants for recognition in trades not covered by the TRRA;

(g) establish subcommittees as required in areas which may include the following:

- licensing of electrical workers
- licensing of plumbers, drainers and gasfitters
- licensing of other trades or trade related groups
- recognition of trades not covered by the TRRA, that is a separate subcommittee for each trade or group of trades as required;

(h) seek the co-operation of State licensing and training authorities in maintaining and developing reorientation programs to meet identified needs:

(i) arrange conferences, seminars and working parties with a view to implementing these terms of reference; and

(j) report fully on the activities of the TRCC, once a year, in a form to be tabled in the Commonwealth Parliament and which may be tabled in State Parliaments.

(Recommendation 56)

Membership of the TRCC and its subcommittees

The Committee recommends that the TRCC consist of two senior representatives nominated from each of the following groups under the chairmanship of a nominee of the Minister for Employment and Industrial Relations:

- national employers organisations;
- national employees organisations;
- State/Territory training authorities; and
- State/Territory licensing authorities.

(Recommendation 57)

This Committee of 9 maintains the successful tripartite structure but also allows for representation from the training and licensing authorities.

The Committee is of the view that the establishment of the subcommittees would be less formal. Their composition should be decided by the main TRCC and need not include its members. It will be important that the subcommittees have adequate representation from the relevant licensing authorities and/or training authorities.
IMMIGRANT REPRESENTATION

135. In examining machinery for the assessment and recognition of qualifications, training and experience in the trade area, the Committee looked at the question of having immigrant representation. Immigrants provide most of the work for these committees.

136. The Committees under the TRRA and the proposed TRCC are all tripartite in nature, that is their members are representatives of the Government, employers and unions. Immigrants are heavily represented amongst these groups. Further, in the assessment and co-ordination of procedures, there is very little directly affecting migration policy. Where necessary, the views of the relevant groups, such as DIEA, can be sought. The Committee considers that care should be exercised by the appointing authority in selecting members for the various committees who, in addition to their other qualifications, have direct knowledge of ethnic affairs and migration experience.
CHAPTER 12
RECOGNITION PROCEDURES IN MEDICINE

INTRODUCTION

1. The Committee is in full agreement with the views of the medical profession itself, that it is necessary to maintain a uniformly high standard for entry to the profession. This principle was supported across the entire range of submissions received from those within the profession:

   ... all residents should have equality of access to a high ... standard of medical care. To allow doctors unable to meet the standards laid down ... to service ethnic communities would be inequitable to those communities and unacceptable to the community at large... (Australian Medical Association, submission 281)

   The Doctors' Reform Society considers it mandatory to ensure a high level of medical competence from foreign medical graduates seeking Australian registration. (Doctors' Reform Society, submission 421)

   ... the standards required of [foreign medical graduates] should not be less than those required of practising Australian graduates. (Submission from group of doctors, Queen Elizabeth Hospital, Adelaide, 383)

2. While it is of obvious benefit to the community that there should be no lowering of standards in order to accommodate the entry of overseas-trained practitioners, a number of submissions (13, 242, 324, 383) made it clear that there are groups within the community whose health needs are not being met at the level achieved by the community at large, and that this could be improved through greater availability of bicultural medical practitioners. It was put to the Committee (21) that the needs of such groups can be so keenly felt that people were prepared to travel great distances to receive treatment from a practitioner with similar cultural understanding and language.

3. It is clear from many submissions made to the Inquiry (for example 28, 244, 384, 403, 421, 427), and from evidence collected in consultations by the Committee, that substantial deficiencies are perceived in the present system for assessing whether overseas medical practitioners meet the Australian standard.

4. By far the greatest number of submissions to this Inquiry on particular occupations concerned medicine, a total of 69 submissions. All submissions from candidates for recognition, and the majority of other submissions (ranging from individual registered practitioners, to medical faculties and health and community organisations), expressed some
disquiet or dissatisfaction with at least some aspects of the recognition system in medicine. This criticism fell into four main areas:

(a) preparation for the Australian Medical Examining Council (AMEC) examination (the examination used to test the medical competence of those holding qualifications not automatically recognised - see Appendix VI);

(b) the conduct and content of the AMEC examination itself;

(c) counselling of candidates both before migration and after arrival on means and likelihood of recognition of their qualifications; and

(d) interstate portability for doctors registered some time previous to the introduction of the AMEC examination, and who now have to sit the AMEC examination in order to register in another State.

5. A detailed account of current practice and procedures for the entry and recognition of overseas-trained medical practitioners is given in Chapter 4 para. 19 and Appendix VI.

6. Briefly, overseas-qualified doctors may currently enter Australia as immigrants:

- as employment nominees within the Labour Shortage category;
- as refugees under humanitarian programs;
- under family reunion arrangements, principally spouses, fiancés, non-dependent children and parents, joining relatives already in Australia;
- under the no-visa arrangements for New Zealanders; or
- as spouses of persons entering as principal applicants in the Labour Shortage category.

Only the first group must hold qualifications that are recognised before entry.

7. All States require medical practitioners to be registered, and specify for this purpose those qualifications which are recognised. Recognition is based on the applicant's primary qualification; higher or postgraduate qualifications are not considered. Recognition of primary qualifications obtained in the United Kingdom, Eire and New Zealand is virtually automatic as is the recognition of Australian qualifications in those countries. All those with primary qualifications obtained in other countries are required to sit the examination conducted by AMEC.
AMEC was created in 1978 on the initiative of the Committee on Overseas Professional Qualifications (COPQ) in consultation with the State and Territory Medical Boards, and consists of representatives of all the State Medical Boards, the Australian Medical Association (AMA) and two medical educationists nominated by COPQ. Its sole business is to manage a qualifying examination for overseas-trained medical graduates, which it does through a Board of Examiners, the Chairman of which is a member of AMEC. The Annual Report for 1980-81 of AMEC shows that it is financially supported from a range of sources – the Commonwealth Government (indirectly through its funding of the Department of Immigration and Ethnic Affairs and of COPQ), direct contributions from State and Territory Medical Registration Boards, fees levied on candidates and the AMA which meets the expenses of its representative on the Council.

The examination is in two parts: Part I comprises two written papers one on English and one on medical theory and practice; Part II, commonly referred to as the clinical, is a practical test which includes an oral segment. A candidate must pass the written Part I before going forward to the Part II clinical; and each candidate is generally permitted a maximum of 3 attempts at the whole examination.

Having successfully completed the requirements, the candidate receives an AMEC certificate which entitles him to registration in every State in Australia.

Prior to the existence of AMEC, each State set its own criteria for recognition and there was little uniformity of practice. Those practitioners who achieved recognition on the basis of an overseas qualification which no longer attracts automatic recognition, now need to sit the AMEC examination in order to be registered in a State other than the one in which they are currently registered.

The following scale of fees applies to all AMEC candidates:

<table>
<thead>
<tr>
<th>Part I &amp; II</th>
<th>Certificate fee</th>
</tr>
</thead>
<tbody>
<tr>
<td>- $250 (each attempt)</td>
<td>- $250 (to increase to $300 in March 1983)</td>
</tr>
</tbody>
</table>

The examination is held twice a year.

Unregistered practice is prohibited in all States, and the availability of temporary registration to permit training for the AMEC examination is very limited.

PREPARATION FOR THE AMEC EXAMINATION

As described above, AMEC is responsible for the conduct of the AMEC qualifying examination. Preparation
is left to the individual, and this is sometimes achieved with the help of those already in the profession.

15. There appears to be a general consensus amongst the medical profession, candidates for recognition and AMEC that there are considerable differences of training and practice background between individual candidates, and that these differences influence performance at and have implications for preparation for the AMEC examination.

16. Some candidates are able to manage the AMEC tests with little difficulty, for example those with postgraduate experience in Canada or the United Kingdom. Others, for various reasons such as lack of English or different medical practice background, require some degree of preparation and reorientation of skills before the examination. While it is possible for those from fairly similar medical training systems and others of exceptional ability to pass the AMEC examination on theoretical preparation alone, the majority would appear to require some exposure to the Australian clinical setting.

17. An indication of the range of performance, grouped by regional background, is given in Table 1. Figures given are for AMEC examinations conducted over the history of the Council, that is, 9 examinations from September 1978 to September 1982. Detailed figures are given in Appendix VI.

18. It is evident from submissions and consultations that the diversity of candidates can be classified into 4 groups, and that a system of recognition needs to be sufficiently flexible to provide adequate approaches for each. The groups are as follows:

(a) the person from a country with a largely similar medicine training and practice background, whose experience allows him to proceed directly through to the AMEC clinical examination;

(b) the person from a country with a moderately different medicine practice background, and with exceptional ability, whose ability will allow him to proceed directly to the AMEC clinical examination;

(c) the person from a country with a distinctly different medicine practice background, who would benefit from a short period of reorientation of his skills to Australian practice; and

(d) the person from a country with a substantially different practice background, who requires substantial additional training and reorientation of skills in order to fit him to Australian practice.
### Table 1

**PERFORMANCE OF CANDIDATES IN AMEC EXAMINATIONS**

*September 1978 to September 1982*

<table>
<thead>
<tr>
<th>Country of qualification</th>
<th>No. of candidates by country of training</th>
<th>No. of attempts at Part 1</th>
<th>No. of passes in Part 1</th>
<th>No. of passes in Part 2</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Near East</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Afghanistan</td>
<td>3</td>
<td>4</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Egypt</td>
<td>39</td>
<td>63</td>
<td>26</td>
<td>9</td>
</tr>
<tr>
<td>Iran</td>
<td>13</td>
<td>17</td>
<td>5</td>
<td>-</td>
</tr>
<tr>
<td>Iraq</td>
<td>3</td>
<td>3</td>
<td>1</td>
<td>-</td>
</tr>
<tr>
<td>Israel</td>
<td>1</td>
<td>2</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Syria</td>
<td>4</td>
<td>4</td>
<td>1</td>
<td>-</td>
</tr>
<tr>
<td>Turkey</td>
<td>4</td>
<td>6</td>
<td>2</td>
<td>1</td>
</tr>
<tr>
<td>(Sub-total)</td>
<td>(67)</td>
<td>(99)</td>
<td>(35)</td>
<td>(10)</td>
</tr>
<tr>
<td><strong>Non-Commonwealth Asia</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Burma</td>
<td>6</td>
<td>10</td>
<td>6</td>
<td>1</td>
</tr>
<tr>
<td>China</td>
<td>2</td>
<td>2</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Indonesia</td>
<td>8</td>
<td>12</td>
<td>6</td>
<td>3</td>
</tr>
<tr>
<td>Korea</td>
<td>1</td>
<td>1</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Pakistan</td>
<td>11</td>
<td>14</td>
<td>5</td>
<td>1</td>
</tr>
<tr>
<td>Philippines</td>
<td>23</td>
<td>33</td>
<td>8</td>
<td>-</td>
</tr>
<tr>
<td>Taiwan</td>
<td>2</td>
<td>2</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Thailand</td>
<td>3</td>
<td>3</td>
<td>1</td>
<td>-</td>
</tr>
<tr>
<td>Vietnam</td>
<td>20</td>
<td>35</td>
<td>19</td>
<td>5</td>
</tr>
<tr>
<td>(Sub-total)</td>
<td>(76)</td>
<td>(112)</td>
<td>(45)</td>
<td>(10)</td>
</tr>
<tr>
<td><strong>Commonwealth Asia</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bangladesh</td>
<td>3</td>
<td>7</td>
<td>3</td>
<td>-</td>
</tr>
<tr>
<td>Hong Kong</td>
<td>12</td>
<td>14</td>
<td>10</td>
<td>5</td>
</tr>
<tr>
<td>India</td>
<td>131</td>
<td>209</td>
<td>129</td>
<td>36</td>
</tr>
<tr>
<td>Malaysia</td>
<td>18</td>
<td>22</td>
<td>21</td>
<td>8</td>
</tr>
<tr>
<td>Singapore</td>
<td>13</td>
<td>14</td>
<td>11</td>
<td>8</td>
</tr>
<tr>
<td>Sri Lanka</td>
<td>50</td>
<td>66</td>
<td>54</td>
<td>21</td>
</tr>
<tr>
<td>(Sub-total)</td>
<td>(227)</td>
<td>(332)</td>
<td>(228)</td>
<td>(78)</td>
</tr>
<tr>
<td><strong>Other Commonwealth</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Canada</td>
<td>6</td>
<td>7</td>
<td>7</td>
<td>2</td>
</tr>
<tr>
<td>Fiji</td>
<td>2</td>
<td>2</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Jamaica</td>
<td>3</td>
<td>3</td>
<td>3</td>
<td>2</td>
</tr>
<tr>
<td>Nigeria</td>
<td>1</td>
<td>1</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Papua New Guinea</td>
<td>4</td>
<td>5</td>
<td>3</td>
<td>2</td>
</tr>
<tr>
<td>Uganda</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Zimbabwe</td>
<td>2</td>
<td>2</td>
<td>1</td>
<td>-</td>
</tr>
<tr>
<td>(Sub-total)</td>
<td>(19)</td>
<td>(21)</td>
<td>(15)</td>
<td>(7)</td>
</tr>
<tr>
<td><strong>Africa - other</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>South Africa</td>
<td>27</td>
<td>34</td>
<td>31</td>
<td>16</td>
</tr>
</tbody>
</table>

(continued)
<table>
<thead>
<tr>
<th>Country of qualification</th>
<th>No. of candidates by country of training</th>
<th>No. of attempts at Part 1</th>
<th>No. of passes in Part 1</th>
<th>No. of passes in Part 2</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Eastern Europe</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Bulgaria</td>
<td>2</td>
<td>5</td>
<td>3</td>
<td>1</td>
</tr>
<tr>
<td>Czechoslovakia</td>
<td>9</td>
<td>15</td>
<td>10</td>
<td>4</td>
</tr>
<tr>
<td>Hungary</td>
<td>3</td>
<td>6</td>
<td>4</td>
<td>2</td>
</tr>
<tr>
<td>Poland</td>
<td>15</td>
<td>25</td>
<td>11</td>
<td>3</td>
</tr>
<tr>
<td>Romania</td>
<td>2</td>
<td>2</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>USSR</td>
<td>14</td>
<td>17</td>
<td>5</td>
<td>3</td>
</tr>
<tr>
<td>Yugoslavia</td>
<td>9</td>
<td>15</td>
<td>5</td>
<td>1</td>
</tr>
<tr>
<td>(Sub-total)</td>
<td>(54)</td>
<td>(85)</td>
<td>(38)</td>
<td>(14)</td>
</tr>
<tr>
<td><strong>Western Europe-Northern</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Austria</td>
<td>2</td>
<td>4</td>
<td>4</td>
<td>2</td>
</tr>
<tr>
<td>Belgium</td>
<td>3</td>
<td>5</td>
<td>3</td>
<td>1</td>
</tr>
<tr>
<td>Denmark</td>
<td>1</td>
<td>2</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>France</td>
<td>2</td>
<td>3</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Germany</td>
<td>17</td>
<td>25</td>
<td>13</td>
<td>4</td>
</tr>
<tr>
<td>Netherlands</td>
<td>6</td>
<td>11</td>
<td>7</td>
<td>1</td>
</tr>
<tr>
<td>Sweden</td>
<td>3</td>
<td>5</td>
<td>4</td>
<td>-</td>
</tr>
<tr>
<td>Switzerland</td>
<td>6</td>
<td>8</td>
<td>7</td>
<td>3</td>
</tr>
<tr>
<td>(Sub-total)</td>
<td>(40)</td>
<td>(63)</td>
<td>(38)</td>
<td>(11)</td>
</tr>
<tr>
<td><strong>Western Europe - Southern</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Greece</td>
<td>7</td>
<td>11</td>
<td>2</td>
<td>-</td>
</tr>
<tr>
<td>Italy</td>
<td>10</td>
<td>13</td>
<td>2</td>
<td>1</td>
</tr>
<tr>
<td>Portugal</td>
<td>2</td>
<td>4</td>
<td>4</td>
<td>1</td>
</tr>
<tr>
<td>Spain</td>
<td>2</td>
<td>5</td>
<td>3</td>
<td>-</td>
</tr>
<tr>
<td>(Sub-total)</td>
<td>(21)</td>
<td>(33)</td>
<td>(11)</td>
<td>(2)</td>
</tr>
<tr>
<td><strong>South and Central America</strong></td>
<td></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Argentina</td>
<td>1</td>
<td>1</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Brazil</td>
<td>1</td>
<td>1</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Guatemala</td>
<td>1</td>
<td>1</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Mexico</td>
<td>3</td>
<td>5</td>
<td>3</td>
<td>1</td>
</tr>
<tr>
<td>Peru</td>
<td>1</td>
<td>1</td>
<td>1</td>
<td>-</td>
</tr>
<tr>
<td>Uruguay</td>
<td>2</td>
<td>3</td>
<td>2</td>
<td>-</td>
</tr>
<tr>
<td>(Sub-total)</td>
<td>(9)</td>
<td>(12)</td>
<td>(6)</td>
<td>(1)</td>
</tr>
<tr>
<td><strong>United Kingdom</strong></td>
<td>2</td>
<td>2</td>
<td>2</td>
<td>1</td>
</tr>
<tr>
<td><strong>U.S.A.</strong></td>
<td>7</td>
<td>8</td>
<td>6</td>
<td>2</td>
</tr>
</tbody>
</table>

**TOTAL** 549 801 455 152

Source: Figures supplied by AMEC.
19. Evidence submitted to the Inquiry (21, 383, 403, 421) indicates there are grave difficulties facing candidates who wish to prepare themselves through some period of supervised practice in the Australian clinical setting. State legislation prohibits practice without a licence; it is often not possible to obtain temporary or restricted licences for such practice; there is some evidence that positions for supervised practice to prepare for the AMEC examination are not available; and at some universities formal undergraduate study is not available to those with overseas medical qualifications.

20. The Committee is aware through its consultations of significant aid given to overseas-qualified doctors by concerned individuals in various States, for example:

(a) the University Medical Schools in NSW, with their special refugees programs (402, 403, 404);

(b) the Working Party of the Resident Medical Officers Advisory Committee to the Health Commission of NSW;

(c) the group of doctors at Queen Elizabeth Hospital in South Australia (383); and

(d) the Royal Australian College of General Practitioners, through its State Faculties, the Family Medicine Program and affiliated organisations such as The Victorian Academy for General Practice (21).

21. The Committee is concerned, however, that efforts to provide a bridge to recognition for candidates are fragmentary and unco-ordinated, and rely heavily on the goodwill of individuals. The demand also appears to far exceed the availability of such assistance.

22. The Committee notes that the founders of AMEC constituted it as an examining body only, and gave it no power or brief to involve itself in training or preparation of candidates for its own examination. There would seem to be a need for some form of preparation to be provided, and the Committee notes that AMEC itself supports the concept of some reorientation and preparation for its examination. The Committee also notes that COPQ has in its annual report for 1981 drawn attention to the need for bridging courses for AMEC candidates. This question is dealt with in Chapters 9 and 10. The Commonwealth Department of Health in its submission (384) contended that systems for the recognition of overseas qualifications should:

be restricted to testing the technical competence of individuals and that some provision, perhaps in the form of a period of supervised practice, should be available to permit individuals, who are otherwise assessed as being competent, to become familiar with language, local styles of practice and prevailing social attitudes.
23. The Committee takes the view that existing informal arrangements for preparation are inadequate and insufficiently flexible to cater for the range of candidates coming forward. This has led to a number of problems, for example hospital superintendents coming under pressure from candidates seeking observer status (21, Smyth in consultations), candidates coming under intense psychological stress feeling they face a hopeless task preparing for the examination without supervised practice (324, 383, 432) and university medical faculties coming under pressure to provide some form of coaching for the examination (384, 403).

24. Since existing immigration policy permits the entry of medically trained people without prior recognition, albeit in small numbers, the Committee considers that it is part of the Commonwealth Government's responsibility towards such immigrants to try to integrate them into the workforce at the level of their knowledge and skills. The numbers involved are likely to be small.

25. The Committee also considers that some form of reorientation facility should be established as a matter of urgency to assist overseas-trained medical practitioners in preparing themselves for the AMEC examination.

26. The Committee recommends the introduction of a co-ordinated, planned program of supervised practice in teaching hospitals throughout Australia to aid in the preparation of candidates described in para. 18 for the AMEC Part II clinical examination. To achieve this it recommends that the Minister for Immigration and Ethnic Affairs appoint a special Working Party financed by the Commonwealth which would, in conjunction with COPQ, develop further and implement the suggested program. The Committee suggests that the Working Party:

(a) include the following interests and areas of expertise:

- Deans of Medical Schools;
- State Health Commissions;
- General medical practice - either through the Royal College of General Practitioners' educational programs or from those involved in the provision of medical services to immigrants;
- Medical postgraduate education - from those involved with the administration of postgraduate training in teaching hospitals and with particular interest in practitioners from overseas; and
- Ethnic affairs organisations involved in immigrant welfare in the field of health;
(b) develop and make recommendations on suitable means for providing supervised hospital practice for candidates preparing themselves for the AMEC examination, and in particular to consider:

(i) the number and cost of supervised practice positions;
(ii) liaison between supervisors and AMEC examiners;
(iii) means of monitoring progress in supervised practice;
(iv) means of selection to supervised places;
(v) income support for candidates and cost recovery from candidates; and
(vi) administrative machinery; and

(c) report to the Minister for Immigration and Ethnic Affairs as a matter of urgency.  

(Recommendation 58)

OUTLINE FOR FORMAL SUPERVISED HOSPITAL PRACTICE PROGRAM

Nature

27. The Committee suggests the Commonwealth negotiate with the States for the establishment of supervised practice positions in major teaching hospitals in each State, to be set aside specifically for the preparation of candidates for the AMEC examination. It is felt after consultation that the Working Party could work towards an average of two positions per participating hospital. The Committee considered that there might well be academic and administrative advantages in locating the program in one or two centres only, but felt that these advantages were outweighed by the difficulties this would present to candidates from other States and the desirability of sharing the load among all States as much as possible.

28. The Committee suggests these positions form an Australia-wide 'pool' available to all candidates, on the understanding that candidates are encouraged to return to their State of normal residence on completion of the supervised practice and register in that State.

29. The Committee suggests that, for reasons of medical and legal responsibility and liability, these positions be at the level of 'student intern', that is final year undergraduate student level and not graduate pre-registration year 'intern' level. The amount of clinical practice and hours of practice, should be considered by the Working Party and guidelines generated for the use of the medical superintendent of the hospital and/or the director of postgraduate medical education.

30. The Committee suggests that the positions give candidates access to teaching staff and classes either as a special group or together with pre-registration year graduates.
31. The Committee envisages that these positions would be supernumerary positions on the hospitals' establishments, funded separately from other positions and available only to overseas-qualified graduates for this specific purpose.

Conditions

32. The Committee suggests that as a condition of continuing participation in the program, candidates' performance be reviewed at 6-monthly intervals, the purpose being:

- to monitor progress and so justify continued occupancy of the position; and
- to monitor preparedness to present for the AMEC Part II clinical examination, and so ensure an optimum turnover of candidates.

33. The balance of advice to the Committee has been that the average duration of supervised hospital practice would need to be 12 months and, as a general rule, not extend beyond 18 months.

Eligibility and Selection

34. The Committee considers certain minimum eligibility requirements should be met to ensure that candidates are equipped to make best use of the positions provided. The Committee suggests these requirements should be based on the following tests:

(a) an English competence test: the aim being to test ability to take maximum benefit from the period of practice. The Committee sees level 3 of the Australian Second Language Proficiency Ratings as being an appropriate measure; an alternative measure of English could be the Combined Universities Language Test applied by Sydney universities (and other Sydney tertiary institutions) to overseas students seeking enrolment in their courses; and

(b) a theory test: the aim being to ensure a satisfactory minimum level of theoretical medical knowledge. A pass at the current AMEC Part I theory examination would be an appropriate interim measure.

35. Some form of selection should also be established because it is likely, at least initially, that the number of eligible candidates will exceed the number of available positions (see paras 43 to 45). The Committee believes that selection to the positions of supervised practice should be based on academic merit. As an interim measure, the pass performance at the AMEC Part I theory examination and, if the Part II clinical has been attempted, the report of the examiners on performance at the clinical could be used.
36. The Committee recognises that there are special community needs which may warrant giving special entry to the quota of positions outside academic merit grading (324, 383, 384). It should be possible to reserve a small number of quota positions for candidates whose registration may meet community needs, but whose academic performance may not have enabled them to make the quota, although they have passed English and theory tests.

37. These procedures would be reviewed in the light of the report of the Task Group to review the AMEC examination (see para. 66).

38. The Committee recommends that participation in the supervised practice program be optional. Candidates of exceptional ability or from comparable medical training systems to those in Australia should remain free to proceed directly from the AMEC Part I theory examination to the AMEC Part II clinical examination.

(Recommendation 59)

39. The Committee has been made aware that the majority of candidates for supervised practice positions will require income support if family circumstances are not to present grave barriers. The Committee is also conscious of the probability that after registration candidates will have better than average earning capacity and that the Government is currently endeavouring to restrain public sector spending through application of the 'user pays' principle.

40. Accordingly, the Committee recommends that income support be made available for candidates taking part in the supervised practice program at a level equivalent to unemployment benefit ($6250 per annum); such support being made available in the form of a non-interest bearing loan:

- to be repaid within 4 years of registration;
- the granting of the loan to be determined by COPQ;
- the loan and repayment to be administered by the Commonwealth Department of Education or other appropriate body on behalf of COPQ; and
- repayment of the loan to be monitored by COPQ.

(Recommendation 60)

41. The Committee is aware that there are existing Government schemes such as the General Training Assistance (GTA) and Tertiary Education Assistance Scheme (TEAS) which may be thought to be applicable to the circumstances of AMEC candidates. However, the Committee was informed by the former Department of Employment and Youth Affairs that GTA benefits were available only for occupations in demand. The Committee
was also aware that TEAS benefits are not available for a second undergraduate degree or for a course not approved for TEAS benefits. Should closer investigation reveal that the benefits of either of these schemes are available to AMEC candidates, the Committee would support such assistance in preference to the above proposal.

42. The Committee considers it may also be necessary, in order to secure the availability and quality of supervised practice positions, for the Commonwealth to offer to share with the States the cost of providing these positions in teaching hospitals. This could be by way of special funds to the States earmarked for the provision of hospital positions for AMEC candidates. The Committee sees such special support as being in the region of $5000 per annum per position.

Backlog

43. It has been difficult for the Inquiry to establish the number of individuals who might choose to make use of a period of supervised practice. Many individuals are isolated, or have not yet approached AMEC; few have formed themselves into identifiable groups. The Committee estimates the backlog of candidates at present to be 276.

44. Of this total, one third is conservatively estimated as not being capable of achieving registration because of inability to learn English, inadequate training, inadequate ability or long absence from practice. Therefore the total number expected to use a supervised practice program is given in the second column, 'viable total', of Table 2.

Table 2

<table>
<thead>
<tr>
<th>State</th>
<th>Total</th>
<th>Viable Total</th>
</tr>
</thead>
<tbody>
<tr>
<td>NSW</td>
<td>114</td>
<td>76</td>
</tr>
<tr>
<td>Vic.</td>
<td>80</td>
<td>53</td>
</tr>
<tr>
<td>Tas.</td>
<td>2</td>
<td>1</td>
</tr>
<tr>
<td>SA</td>
<td>20</td>
<td>13</td>
</tr>
<tr>
<td>WA</td>
<td>20</td>
<td>13</td>
</tr>
<tr>
<td>Qld</td>
<td>40</td>
<td>27</td>
</tr>
<tr>
<td></td>
<td>276</td>
<td>183</td>
</tr>
</tbody>
</table>

Source: In the absence of official figures, Secretariat estimates.
45. The implications of this backlog for funding and for time taken to overcome it are:

(a) **TIME**

Estimated available positions in teaching hospitals (assume 30 hospitals participate by taking 2 candidates each) 60
Viable total backlog, say 180

Total time to overcome backlog, assuming an average of 12 months supervised practice 3 years

(b) **COST**

(based on an average of 12 months per position)

Cost per individual
- income support 6 250
- hospital subsidy 5 000

**TOTAL** 11 250

Recovery of income support (based on CALFRIC performance 90%)* 5 625

Net cost to Commonwealth 5 625

Backlog x 180

Total for backlog, say 1 012 500

Over 3 years, per annum 337 500

Ongoing Demand

46. Information provided to the Committee by DIEA suggests that ongoing demand will be comparatively low. However, under present policy and procedure it is difficult to predict in fine detail this ongoing demand (see Recommendation 1 in Chapter 3). In this context ongoing demand refers only to new arrivals and not to backlog cases.

*CALFRIC: Committee for Allocation of Loans for Refugees from Indo-China. The Committee understands that the repayment rate is 90 per cent.*
47. In recent years the migration of medical practitioners has fallen away substantially. Since 1979 medical practitioners as principal applicants in the former general eligibility, now labour shortage, category (but not their dependents) have required employment nomination which in turn requires recognition of qualifications before approval to enter Australia can be granted.

48. To give some idea of the impact of this change in policy, the figures for the arrivals of new settler medical practitioners have fallen from 680 in 1977-78 to 97 in 1981-82. While it is obviously not sound to attribute all change in the figures to this policy change, it seems reasonable to believe its effect is the major element in the change.

49. Apart from labour shortage, entry is in the 3 main categories of family migration, special eligibility and refugees. The majority entering under special eligibility represents the trans-Tasman movement and, in most cases, these persons hold registrable New Zealand or United Kingdom qualifications. Advice from DIEA is that few refugees with medical qualifications have been selected in recent years. Thus the majority of persons with unregistrable medical qualifications would appear to enter within the category of family migration or as dependents within the labour shortage category.

50. Working from the backlog figure, and assuming that the backlog has developed over a period of about 10 years, the Committee estimates an annual entry rate of persons with unregistrable qualifications of about 30 per annum. Adjusting this figure on the same basis for viability as the figure for backlog (see para. 46), the ongoing demand is estimated at about 20 per annum of which not necessarily all will seek a period of supervised practice. In discussions with health administrators it would seem this figure together with the annual number of graduates from Australian medical schools of 1200 could be accommodated within teaching hospitals. Drawing a parallel from Australian university practice administrators might wish to set a quota for ongoing demand of 20 places per annum. On this basis the net ongoing cost to the Commonwealth would be approximately $110 000 per annum. It is emphasised that this figure is based on assumptions and estimates and is only intended as a guide to the cost of providing an ongoing program of supervised practice.

**CONDUCT AND CONTENT OF THE AMEC EXAMINATION**

51. The Committee received 21 submissions from individuals critical of the AMEC examination, most of them candidates who had attempted and failed the examination. Many expressed a very emotional response to difficulties encountered. Some people compared the Australian examination unfavourably to the
Educational Commission for Foreign Medical Graduates (ECFMG) examination, a similar but not quite equivalent examination applied to persons with overseas medical qualifications in the United States of America, and many felt the AMEC examination was set up as a deliberate barrier. In particular the extended clinical examination, which is a feature inherited from the British system of medical examination, was felt to be a psychological ordeal for those trained outside the British system.

52. It is significant that the criticism of the examination did not come only from failed candidates. The Committee received a number of weighty submissions from respected and eminent members of the profession in teaching hospitals and university medical schools. Some of the critics had been involved in assisting candidates to prepare for the examination. Most expressed concern about procedures for the conduct of the examination and the validity of the examination. The Commonwealth Department of Health in its submission (384) after acknowledging 'the inherent difficulties in providing a generalised assessment for overseas medical qualifications' added:

Nevertheless, the low pass rate of AMEC candidates, irrespective of the country in which their basic qualifications were obtained, suggests there is a need for a review of the preparation for, and content and structure of, the examination. Two of the matters such a review might explore are the extent to which deficiencies in language skills and social and cultural awareness were the primary barriers to immigrants obtaining recognition of their medical qualifications and the identification of ways of overcoming the deficiencies.

53. In the submissions received, and in consultations undertaken by the Committee, the areas of English testing and the clinical component of the examination were singled out for criticism.

54. From its submission and in consultations, it is clear AMEC is aware of the difficulties some candidates face and, without altering the structure of the examination or compromising standards, AMEC has gone some way to accommodate and assist marginal failures. The Secretariat to the Committee has been advised informally that the Executive of AMEC has proposed changes to procedures which could be expected to be welcomed by candidates.*

* Subsequent to the above, formal advice of changes was received on 11 November 1982, too late for inclusion in this Chapter. See Attachment 5 for details.
55. The Committee was not able to locate any clear definition by AMEC of the goals of the examination. The information currently given to candidates preparing for the examination gives little indication either of the range and depth of knowledge required, or of the skills to be tested in the Part II clinicals. Opinions given to the Committee on the level which the examination tested were varied and ranged through 'final year undergraduate', 'first year postgraduate', '5 years experienced' to 'near specialist level'.

56. The examination used by AMEC was originally developed for the Medical Board of Victoria in the 1960s. In response to queries about academic review and validation of the examination the Committee was informed of a validity study of the multiple choice question paper conducted in 1972 on a limited sample of general practitioners. This study also touched on the difficulties of producing an appropriate English test. It would appear that the AMEC examination has not been the subject of a continuing review and validation since its adoption in 1978. The Committee believes that this is a serious weakness, as it would be with any examination.

57. It is evident to the Committee that there exists widespread unease about the examination. This unease was expressed not only by those who undertook the examination, but also, more significantly, by people of educational standing within the profession who are directly involved in the teaching and testing of the competence to practise medicine of Australian graduates.

58. The Committee noted that many of the submissions critical of the AMEC examination made mention of the English test in their criticisms. The points of criticism concerned the appropriateness of the English test, its secretiveness and how it fits into the structure of the AMEC examination (45, 383, 444). Chapter 7 on the relevance of English deals with the issues of appropriateness and the need for a clearly defined and publicised standard. The remaining criticism concerning its place in the structure of the examination remains to be dealt with here.

59. As the examination is currently structured, the English test is an integral section of Part I of the examination; the other section is the medical theory paper. The candidate must achieve a satisfactory grade in both sections of Part I to be regarded as successfully passing Part I. The AMEC records do show cases of candidates passing the medical theory section but not the English and being thereby ineligible to proceed to Part II of the examination. A failure in the English paper, therefore, constitutes or consumes one of the candidate's three attempts at the AMEC examination regardless of whether he passes the medical theory paper.
60. This linkage is at variance with the procedure adopted by the Australian Examining Council for Overseas Physiotherapists (AECOP), the comparable physiotherapy Council, regarding English where English is a prerequisite for eligibility to sit the written theory paper. The Committee regards the AECOP procedure as more logical and equitable. The Committee therefore recommends that English be separated from Part 1 of the AMEC examination and be a prerequisite for eligibility to sit the Part 1 examination, so that a candidate's failure to pass English is not counted against the candidate's possible three attempts, and further that the standard of English to be tested be clearly established as recommended in para. 44 of Chapter 7.

(Recommendation 61)

61. Further the Committee regards the AMEC English test as seriously defective in that it makes no test of the candidate's oral comprehension or expression, and it would regard as academically questionable if not unsound any attempt to judge those abilities in the context of the clinical examination.

62. With respect to the clinical examination, the Committee understands that the traditional form of clinical examinations has been under question for some time by medical educationists. The Committee was also made aware that it has not been easy to develop alternatives to the traditional clinical examination, but that an alternative form which aims to enhance objectivity and reproducibility is employed in at least one Australian medical faculty. In the United States of America this form of clinical examination is not used in the ECFMG and Visa Qualifying Examination (VQE) which fulfil a similar but not identical role to the AMEC examination in Australia.*

63. The Committee considered also whether the limit of three attempts at the examination is excessively restrictive. On the one hand one could argue that if the candidate pays to take the examination why may he not take it as often as he chooses as long as he pays. On the other hand, the Committee was advised that the current charges do not recover all the costs associated with the examination, and that it is the universal rule in Australian medical schools that students are excluded after two failures of a year's course of study. The Committee noted that in a number of cases AMEC had permitted candidates a fourth attempt.

64. On balance the Committee considered that a limit of three attempts at the examination is reasonable in light of university practice provided that candidates are permitted, as in universities, a facility akin to the supplementary examination available to Australian university students. At

* See Appendix VI for more information concerning ECFMG and VQE.
present AMEC candidates who fail in one of the 3 sections of
the clinical examination are required to repeat all three, for
which opportunity they must wait 6 months. The Committee
considers this regulation unduly harsh and that where the
candidate fails narrowly in one section, but passes the other
two, he should be required to take only the failed subject at
the following examination 6 months later.

65. The Committee does not feel it is in a position to make
an assessment of the testing procedures used by the examiners
in the AMEC examination, nor would it feel it had the
competence to do so. Nevertheless, the weight of criticism of
the examination is such that the Committee feels obliged to
conclude that there is an urgent need for a thorough and
searching independent review of the conduct and content of the
AMEC examination.

66. The Committee recommends that the Minister for
Immigration and Ethnic Affairs appoint a Task Group of
independent experts to undertake, in conjunction with COPQ, a
thorough review of the AMEC examination. The Committee
suggests that the guidelines for this Task Group be as follows:

(a) to include:
   - a representative of Deans of medical schools;
   - a medical educationist in the field of
     general/community practice;
   - a medical educationist experienced in clinical
     examinations at the undergraduate level;
   - an educational testing expert from outside the
     field of medical education; and
   - a representative of community interests drawn from
     outside the medical profession;

(b) to examine in particular the English test currently used
    in Part 1 AMEC and methods of examination of clinical
    competence which ensure that elements of bias are
    minimised, the testing of candidates is more amenable to
    comparison and reproduction, and objectivity is enhanced;

(c) to take into account material produced to this Inquiry
    by way of submissions, evidence presented in
    consultations, and Secretariat research; and

(d) to report to the Minister for Immigration and Ethnic
    Affairs as a matter of urgency.

(Recommendation 62)

RIGHT OF APPEAL

67. The Committee noted that there is no formal mechanism
for appeal or review of decisions taken by AMEC and that this
in part is a consequence of the structure that AMEC, in
consultation with COPQ, chose for itself. This lack of any
form of independent review of AMEC decisions received unfavourable comment in submissions (324, 421). The Committee considered that a right of appeal should be provided and that this should be through COPQ. The appropriate appeal process for AMEC decisions is dealt with further in Chapter 10.

COUNSELLING

68. There are 3 aspects to the counselling of overseas medical graduates: counselling overseas as an aid to deciding whether to migrate; counselling on taking the AMEC examination; and counselling for those in Australia on preparation for the AMEC examination, together with other aspects of recognition including the management of failure to achieve recognition.

Counselling Overseas

69. Many of those in the backlog of unrecognised doctors (para. 43) applied for migration, or travelled to Australia, at a time of change in regulations and the system of recognition. In some consultations it was made clear to the Committee that the quality of advice given overseas is often inadequate. It would seem there is a need for two varieties of counselling. Those doctors requiring employment nomination and recognition of qualification in order to be accepted for migration require advice on procedures for obtaining recognition while outside Australia. Those eligible to migrate regardless of the status of their qualifications, that is family reunion persons, labour shortage dependents and refugees, require counselling on the difficulties to be faced as an aid to deciding whether to immigrate or not.

70. It would appear that considerably greater emphasis needs to be given to the latter type of counselling, and that a procedure where a person writes to AMEC or COPQ in Australia for information allows insufficient detail and little opportunity for the applicant to understand the full impact of what is being said.

Counselling for the AMEC examination

71. The Committee received considerable criticism of the approach used by AMEC in counselling candidates:

- It is felt that the AMEC operates under conditions of some secrecy, closed to outside scrutiny, criticism, appeal, or suggestion. Because of this, rightly or wrongly, it is widely felt that it is inconsistent, discriminatory, institutionalised and self-protective. (421)

- The AMEC is an examination without syllabus, without known standard of passing, without known correcting procedure, without known source of its questions and
with a practical part which really depends on the personal nervous tolerance of the candidate rather than his knowledge. (75)

results of the examinations are kept confidential from the candidates. . . . Criteria for the assessment of a successful candidate must be known. (18)

72. AMEC produces an information booklet for candidates but, given the importance of the examination for recognition, the information given in it on the range or depth of knowledge tested in the examination and the skills tested in the clinical, is most inadequate.

73. The Committee recommends that AMEC improve the depth and quality of advice given to candidates wishing to present for the AMEC examination and that this include

. detailed information on the objectives of the examination and the standards and skills being tested;
. access to examples of past examination questions; and
. detailed information on pass or fail performance at both Part I written theory and Part II clinical examinations.

(Recommendation 63)

74. The Committee understands that, since its discussion with AMEC, the latter has decided to revise the information it provides to its candidates. The Committee has, however, had no opportunity to study these changes.

Counselling on Other Aspects of Recognition

75. Information obtained from the NSW Ethnic Affairs Commission Overseas Qualifications Unit demonstrates that there is an urgent need for an able, informed advice and advocacy service for those doctors in Australia endeavouring to achieve recognition. There would also appear to be a considerable need for counselling for those whose skills are so inadequate that reorientation is inappropriate, and who need to transfer skills to another occupation.

76. The Committee recommends that, in carrying out the recommendations on counselling and on advice and assistance referred to in paras 16 to 21 of Chapter 10, COPQ give special attention to the needs of overseas-qualified medical practitioners.

(Recommendation 64)
RELATIONSHIP BETWEEN AMEC AND COPQ

77. AMEC's incorporation under the Associations Ordinance of the Australian Capital Territory grants it legal entity but confers on it very few responsibilities. These latter mainly consist of the production of an annual balance sheet. Unlike the Boards which provide the overwhelming majority of its members, AMEC is not subject to any process of administrative review of its decisions or procedures. COPQ, on the other hand, is subject to the normal review processes of Commonwealth public service administration. As elaborated in the chapter on COPQ, the Committee does not favour COPQ establishing and then losing control of a number of separate, legally autonomous bodies to do what COPQ itself should be authorised to do.

INTERSTATE PORTABILITY

78. The Committee's attention was drawn to situations where current State registration laws limit the ability to move interstate of overseas-trained doctors registered prior to the introduction of AMEC.

79. The Committee observes that 4 factors contribute to this difficulty:

(a) eligibility for registration is defined in terms of primary academic qualifications, and not current registration in another State, nor postgraduate or specialist qualifications. The Committee noted the divergence of this requirement with the practice in the engineering profession which gives weight to studies subsequent to the primary qualification;

(b) before the establishment of AMEC, there existed a wide divergence between States on which overseas primary qualifications would lead automatically to registration;

(c) savings clauses in new State legislation which followed the establishment of AMEC operate to protect only those persons already registered in that particular State, and

(d) in order to obtain portability, the individual must re-establish primary level qualification by obtaining an AMEC examination pass, or by completing an automatically acceptable primary degree (Australia, United Kingdom, Eire or New Zealand).

80. Submissions received indicate that the difficulty is of large dimensions. Some 2300 persons with foreign medical qualifications, or 10% of registered medical practitioners, may be affected. It is a problem which results from a changeover of procedures in recent years and a problem which will diminish with the passage of time. Although its existence is indirectly the result of the establishment of the AMEC examination, as at present constituted, AMEC has no brief to examine or resolve this particular problem.
81. The Committee is of the opinion that the current situation is anomalous given the development of greater co-ordination between the States in their registration legislation. It would appear that current savings clauses may have been inadequately framed, and that corresponding discretionary powers of the medical registration boards are either insufficiently widely drawn, or that interpretation of discretionary powers, where these exist, is excessively narrow and results in the present anomaly.

82. Several options present themselves for the resolution of this issue:

(a) current savings clauses in medical registration acts could be widened to specifically include those currently registered and practising in another State;

(b) expansion of discretionary clauses to permit boards to consider on their merits applications for registration from those currently registered in another State (current discretionary clauses frequently allow only individuals of 'international standing', that is of international renown or who are international leaders in a branch of the profession, to be so considered);

(c) where discretionary clauses already exist in a widely-drawn form, to encourage their use for those currently caught on the 'shoulder' of the introduction of the AMEC assessment system; and

(d) the AMEC examination could be applied more flexibly for those practitioners already registered and practising within a State, for whom, in its current form, the examination is seen to be too broadly based, (that is established practising specialists who have developed a greater depth of skill in a narrow area at the expense of their breadth of medical knowledge are obliged to undertake extensive revision of areas outside their specialty simply in order to sit the AMEC examination); and/or too heavily biased towards the content of current undergraduate courses, (that is an established general practitioner of many years good standing whose competence has developed beyond the detail of undergraduate study needs to undertake extensive study of developments in medical science, as opposed to the practice of medicine, since he first qualified).
The Committee recommends that the Minister for Immigration and Ethnic Affairs refer the issue of portability between States of medical registration based on overseas qualifications to the Commonwealth Minister for Health, for referral to the Conference of the Commonwealth/State Ministers for Health regarding the development of means to overcome the difficulties facing such medical practitioners, and further that COPQ keep progress towards resolution of these difficulties under active review.

(Recommendation 65)

RECIPROCITY

Under all State medical registration acts, a practitioner with a primary qualification gained in the United Kingdom or New Zealand and, in most States, Eire obtains automatic recognition of qualifications. This removes many barriers to migration and/or employment in Australia and, in turn, Australian primary qualifications are given recognition in those countries, easing opportunities for employment of Australian practitioners in the United Kingdom, Eire and New Zealand.

This reciprocity is a tradition which springs from the history of medical education in Australia. The standards of each medical faculty in Australia are still examined and accredited by the General Medical Council (GMC) of the United Kingdom, and this 'vetting' of standards is one reason for the recognition of Australian primary qualifications in the United Kingdom.

The benefits which flow from these reciprocal arrangements are said to be significant. The Commonwealth Department of Health 'sees this form of interchange as being important in maintaining a health workforce of high quality in Australia' (384). Each year about 500 Australian doctors travel to work or study in the United Kingdom where, because of the system of health care, the young graduate is exposed to a greater range and volume of experience than would be possible in Australia. As an extension of the process of medical education, taken in its widest sense, reciprocity confers considerable benefits. These benefits may still be available if reciprocity ceased, but the procedure to be followed to obtain them would probably be more demanding than at present.

There are some costs, however, in preserving these arrangements, and many submissions to the Inquiry described the existence of reciprocity as discrimination (95, 244, 324, 340). It is difficult to see how this reciprocity can be defended by contending that GMC accreditation is the mark of equal standards when medical schools in Hong Kong and Singapore, to give just two examples, are also accredited by the GMC, but graduates of those schools are denied automatic recognition in Australia.
88. The Committee is aware of the proposed establishment of an Australian Medical Council which would take over the role of the GMC in monitoring standards and accrediting Australian medical schools. There is some expectation that the Council will come into being in 1983, but the Committee considers action to remedy the present situation should not await or be dependent upon the establishment of this body which is not yet in existence.

89. The Committee could find no compelling evidence in the submissions presented to it or in its consultations for the retention of the discrimination between different groups of settlers in Australia which automatic recognition of some overseas medical qualifications produces. The Committee records its view that it firmly opposes this discrimination and recommends its removal. The Committee is conscious that relationships with other countries are involved and the matter needs to be handled diplomatically to ensure that, as far as possible, any benefits Australians receive by virtue of the automatic recognition arrangements are preserved.

90. The Committee recommends that the Commonwealth Government ensure that the question of the continuing existence of reciprocity in relevant Commonwealth and State Acts, and hence discrimination, is considered at the next Conference of Commonwealth and State Ministers for Health and that the Ministers carefully examine the balance of the benefits said to attach to reciprocity against the cost to the whole community of continuing such discrimination and, further, that the Conference of Commonwealth and State Ministers for Immigration and Ethnic Affairs keep this matter under review.

(Recommendation 66)
CHAPTER 13
RECOGNITION PROCEDURES IN DENTISTRY

INTRODUCTION

1. The Committee agrees fully with the view expressed to it by the dental profession during consultations, that an entry standard comparable to that required of dentists graduating in Australia should continue to apply to those from overseas. Many overseas-qualified dentists themselves, when interviewed by the Committee, or in their written submissions also supported this principle:

We appreciate the need to maintain high standards in Australia.
... To achieve this ... the following would be required:

- a sound academic [and] ... clinical knowledge of dentistry, comparable with that of recent graduate dentists from Australian universities;
- the necessary comprehension of the English language to be able to practise dentistry in Australia.

(Submission 411 from The Australian Association of Overseas-Qualified Dentists - membership 22 unregistered dentists)

2. A number of submissions made the point that Australian dental practice is largely monolingual and that as a result, members of some ethnic groups, and especially those recently-arrived, often neglect necessary dental treatment. The Committee was informed of a number of such groups whose dental needs are not being met at the level achieved by the community at large. The submissions argue that this situation could be improved if more bicultural dentists are able to meet Australian recognition requirements.

3. It was noted that two methods are used by most Australian dental boards for assessing overseas dental qualifications:

- primary degrees from the United Kingdom, Eire and New Zealand are accepted by dental boards as fulfilling their academic requirements for registration; while
- holders of all other overseas dental degrees must pass an examination set up with the agreement of the Australian dental boards and administered since 1978 by the Expert Panel in Dentistry of the Committee on Overseas Professional Qualifications (COPQ). The Committee noted that the Expert Panel will shortly be incorporated as a separate legal entity, the Australian Dental Examining Council (ADEC).
4. The Committee found that while some members of the profession favoured the automatic acceptance of the degrees of the United Kingdom, Eire and New Zealand, their reasons were based mainly on the advantages of the reciprocal recognition the countries extend in turn to Australian degrees. These arrangements have for many years permitted Australian dentists to enter the United Kingdom for postgraduate experience with a minimum of formality.

5. In the Committee's consultations considerable support was expressed for the proposition that entry standards are best maintained by the use of written and practical examinations designed to test the competence of the individual dentist.

6. The Committee was in complete agreement with the examination concept. Further, it observed that the exemption of some overseas dentists from any test of their skills because of reciprocity has been criticised as discriminatory. The Committee therefore concluded that in the interests of equity and uniform standards, all overseas dentists seeking recognition should be required to submit to a test of their skills by means of written and practical examinations. The question of reciprocity is considered further at paras 79 to 86.

7. While supporting the examination concept, the Committee noted with concern that, of 145 candidates who had attempted the COPQ dental examination, only 6 had succeeded in passing and thereby becoming eligible for registration in most Australian States.

8. The second largest proportion of submissions to the Inquiry on particular occupations concerned dentistry. Twenty-seven submissions were received, 18 of which were from individuals and 9 were from organisations.

9. Seventeen of the submissions from individuals were from persons seeking recognition of their dental qualifications. Twelve of the 17 dentists resided in Victoria and, of the total, 9 had attempted and failed the COPQ examination.

10. All the overseas-qualified dentists expressed criticism about the existing procedures for the recognition of their qualifications. This criticism fell into four main areas:

   (a) counselling of candidates both before migration and after arrival on matters relating to the recognition of their qualifications;

   (b) candidates' perceptions of the COPQ examination as a barrier to recognition;

   (c) preparation for the COPQ examination; and

   (d) the conduct of the COPQ examination.
A detailed account of current practice and procedures for the migration and recognition of overseas-qualified dentists is given in Appendix VII.

Briefly, overseas-qualified dentists may currently enter Australia for settlement in the following categories:

- as employment nominees within the Labour Shortage category;
- as refugees or under any special humanitarian program;
- under family reunion arrangements for Australian residents, principally spouses, fiancees, brothers and sisters, non-dependent children and parents;
- under the no-visa arrangements for New Zealanders; or
- as spouses of persons entering as principal applicants.

Only the first group must hold qualifications that are recognised before entry.

All States and Territories require dentists to be registered in order to practise, and specify which overseas qualifications are recognised. As already discussed, recognition of primary qualifications obtained in the United Kingdom, Eire and New Zealand is automatic and all those with qualifications obtained in other countries need to sit the COPQ examination.

The Expert Panel in Dentistry consists of 5 members who are presidents and members of the dental boards in several States. The Panel Chairman is in addition, a leading dental educationist. The Expert Panel has two sub-committees, one concerned with the written part of the examination, the other with the clinical examination. The Panel was set up solely as an examining body and is not empowered to provide educational services for those attempting its examination. Information booklets on the examination are provided to candidates, but the Panel has no established counselling function to advise on dental topics.

The examination is in three parts: Parts I and II are English and dental theory tests respectively consisting of 5 papers which are taken concurrently over a period of 3 days; Part III is a practical test or clinical examination held over a period of 3 to 5 days depending upon the number of candidates. A candidate must pass Parts I and II before attempting Part III and is generally permitted a maximum of two attempts at each stage of the examination. Parts I and II may
be taken in Australia or at overseas posts at an examination held twice yearly in March and September. Part III can be taken only in Australia and present arrangements are for it to be held annually in late November or early December.

16. The following scale of fees applies to all candidates:

<table>
<thead>
<tr>
<th>Parts I and II</th>
<th>$200</th>
</tr>
</thead>
<tbody>
<tr>
<td>Part III</td>
<td>$250</td>
</tr>
<tr>
<td>Certificate fee</td>
<td>$150</td>
</tr>
</tbody>
</table>

17. Candidates who pass all parts of the examination receive a certificate which is accepted as fulfilling the academic requirements for registration in all States and Territories except Queensland and Tasmania.

18. The Committee considered it anomalous that an examination structured at the national level with the advice and consent of all Australian dental boards, and operating since 1978, should not yet have been accepted in all States. It was noted by way of comparison, that the examination of the Australian Medical Examining Council (AMEC) for overseas-qualified medical practitioners has achieved acceptance in all States and Territories. The Committee views it as incongruous that the COPQ dental examination has not yet received national recognition and draws the matter to the attention of the Council of Commonwealth and State Health Ministers.

19. Unlicensed practice is prohibited in all States and the availability of temporary registration to train for the COPQ examination is very limited.

COUNSELLING

20. The Committee identified three major stages in the provision of counselling to overseas-qualified dentists:

- counselling at overseas posts as an aid to deciding whether to immigrate;
- counselling those preparing for the COPQ examination in dentistry; and
- counselling those experiencing difficulties with the recognition system.

Counselling Overseas

21. In its consultations a number of examples of alleged misinformation at overseas posts were drawn to the Committee's attention. The Committee found it difficult to comment on these matters at a distance. It is obvious that counselling can often be misunderstood or resisted by persons anxious to migrate to Australia. However, the Committee could not
discount the possibility that counselling may have been given on occasions, using outdated and inaccurate information and by persons not necessarily qualified to advise intending immigrants. In its consideration of this matter the Committee considered counselling overseas to be given at two principal levels, namely pre-application and post-application.

22. At the pre-application level an urgent need clearly exists to examine and define procedures for providing accurate information to general enquirers who may be contemplating immigration or simply require general background. A booklet 'Dentistry in Australia' produced by COPQ and distributed to overseas posts was drawn to the attention of the Committee. This booklet contains information about registration requirements in Australia, but it does not describe adequately the difficulties likely to be encountered in sitting the COPQ examination. Some doubts existed as to the booklet's general availability.

23. At the next level of enquiry at an overseas post when the application is made, the current procedures require a more accurate information base for counselling. Those coming to take up a specific dental position and whose qualifications are not registrable are required to sit Parts I and II of the COPQ examination overseas. The overseas post is required to refer such cases to COPQ in Canberra in order to make examination arrangements. The Committee was concerned that dentists (see para. 12) eligible to immigrate regardless of the status of their qualifications, may not be counselled adequately on the difficulties in seeking recognition of their qualifications they are likely to encounter after arrival in Australia. The Committee is aware of a number of persons in these categories who have experienced difficulties. For example, 3 dentists who entered as spouses and unsuccessfully sought recognition of their qualifications for a number of years are known to have recently left Australia to resume dental practice overseas.

24. It would appear that clearer procedures need to be defined and established for persons eligible to immigrate regardless of the status of their qualifications. A possibility would be to encourage them to sit the Parts I and II COPQ examinations overseas or, if this is not feasible, to require a signed acknowledgement of the difficulties likely to be encountered.

Counselling for the COPQ examination

25. The Committee considered that there are considerable shortcomings in this area. Candidates in Australia often approach a large number of authorities and sometimes receive confusing advice before being advised of the existence of COPQ, which is based in Canberra and has no State offices. A further problem is that COPQ staff are not dental professionals and the counselling they provide relates to the administration of the examination and not its content. No provision currently exists for ready access to counselling of this nature.
26. The Expert Panel in Dentistry produces information booklets for candidates on the written and clinical stages of the examination. However, the Committee took the view that written information is often insufficient and that applicants should, upon request, be personally counselled on matters relating to the content of the examination.

27. The Committee recommends that the Expert Panel in Dentistry improve the depth and quality of advice given to candidates for examination and that this include:

- detailed information on the objectives of the examination and the standards and skills being tested;
- access to examples of past examination questions; and
- detailed information on pass or fail performance at both the written theory and the clinical examinations.

(Recommendation 67)

Counselling those experiencing difficulties

28. The work of the NSW Ethnic Affairs Commission Overseas Qualifications Unit demonstrates that there is an urgent need for an information and advice service for those dentists in Australia endeavouring to achieve recognition. There would also appear to be a considerable need for counselling for those whose skills are considered to be so inadequate that they need to transfer to another occupation.

29. The Committee recommends that in carrying out the recommendations on counselling overseas and in Australia, and on advice and assistance in paras 16 to 21 of Chapter 10, COPQ give special attention to the needs of overseas-qualified dentists.

(Recommendation 68)

CANDIDATES' PERCEPTIONS OF THE COPQ EXAMINATION AS A BARRIER TO RECOGNITION

30. It was clear from submissions and consultations that many candidates for recognition saw the low pass rates of the COPQ examination as a considerable psychological barrier. Some considered their chances of success to be so small that they would not even attempt the examination. Instead, they had investigated the possibility, generally without success, of re-entering the profession through undergraduate or postgraduate study in a dental faculty. A number regarded the examination as a device for excluding overseas dentists from obtaining registration in Australia. Still others thought that neither the examination nor university study was a realistic option and were awaiting the outcome of this Inquiry.
The statistics show ... clear discrimination because of 151* dentists only six passed during the last four years. (146)

... in the last 5 years 151 dentists sat ... and only 5 (sic) passed. For this reason I applied for university entrance, but I was unsuccessful. (147)

... these tests are just a formality because ... only six out of 151 have been successful. (162)

PREPARATION FOR THE COPQ EXAMINATION

31. There is no formal course of instruction to prepare candidates for the COPQ examination. As described above, the Expert Panel in Dentistry is an examining body only and has no responsibility for the preparation of candidates nor does it provide a counselling service at the professional level. Nevertheless, the Committee noted the steps taken by the Panel in recent years, within the limits of its powers, to provide short orientation sessions for those attempting the Part III clinical examination.

32. To assist candidates the Expert Panel, as mentioned above, supplies booklets specifying suggested text-books and subjects to be examined. Samples of the multiple-choice-question (MCQ) format of the written papers are shown, as well as brief descriptions of the clinical examination topics. However, past examination papers are not available.

33. A small number of overseas-qualified dentists have attended the 6-month intensive courses in professional English sponsored by the Department of Immigration and Ethnic Affairs (DIEA). These courses were introduced on a trial basis in 1978 as one of the recommendations of the Galbally Report. Periods of class-room instruction were combined with observational sessions and laboratory work at dental schools and hospitals. However, the lack of temporary registration necessary to treat patients under supervision precluded the gaining of practical, clinical experience. The courses were principally designed to teach advanced English and could not be seen as constituting a formal medium of preparation for the examinations. This matter is discussed further in Chapter 7.

* 151, as published in the COPQ Annual Report for 1981, refers to the number of attempts to pass Parts I and II between 1978 and 1981. The Report does not show the number of individuals involved.
34. The Committee was informed during consultations with the dental profession that there are marked differences in the practice of dentistry between countries. A complex of factors, economic, social and cultural, determine the kind of dentistry practised in a particular country. The differences are particularly pronounced between European and Asian countries.

35. All the dental authorities consulted by the Committee were in agreement that only candidates with comparable training and experience to that of Australia could pass the COPQ examinations without some formal training and experience in the local clinical setting. One dental authority distinguished two broad categories of candidates:

- those familiar with Australian standards of dentistry but who have not practised for three or four years and need to regain their technical facility; and
- those unfamiliar with Australian standards, irrespective of how recently they have been practising.

36. Both categories of candidate will need greater or lesser periods of reorientation to provide for their particular needs.

37. An indication of the range of performance of COPQ candidates is shown in Table 1. Figures are for the 11 written (Parts I and II) and 5 clinical (Part III) examinations conducted from January 1978 to March 1982.

38. At present, preparation for the COPQ examinations is largely a matter of individual energy and initiative, often assisted and encouraged by sympathetic members of the profession. Reading for the Part II theory papers can be undertaken by candidates gaining access to dental libraries in the various States. Some candidates have also been granted permission to attend undergraduate lectures. The Committee is aware through its consultations of significant aid given to some candidates by concerned individuals in dental schools, dental hospitals and in private practice in various States.
Table 1

PERFORMANCE OF CANDIDATES IN COPQ DENTAL EXAMINATIONS
January 1978 to March 1982

<table>
<thead>
<tr>
<th>Country of qualification</th>
<th>No. of attempts at Parts I and II</th>
<th>No. of passes in Parts I and II</th>
<th>No. of passes in Part III</th>
</tr>
</thead>
<tbody>
<tr>
<td>Near East</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Egypt</td>
<td>34</td>
<td>6</td>
<td>-</td>
</tr>
<tr>
<td>Iran</td>
<td>6</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Iraq</td>
<td>1</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>Lebanon</td>
<td>1</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Turkey</td>
<td>1</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>(Sub-total)</td>
<td>(43)</td>
<td>(7)</td>
<td>(1)</td>
</tr>
<tr>
<td>Non-Commonwealth Asia</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Burma</td>
<td>2</td>
<td>1</td>
<td>-</td>
</tr>
<tr>
<td>China</td>
<td>2</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Indonesia</td>
<td>3</td>
<td>1</td>
<td>-</td>
</tr>
<tr>
<td>Korea</td>
<td>3</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Laos</td>
<td>1</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Pakistan</td>
<td>1</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Philippines</td>
<td>23</td>
<td>1</td>
<td>-</td>
</tr>
<tr>
<td>Taiwan</td>
<td>3</td>
<td>1</td>
<td>-</td>
</tr>
<tr>
<td>Vietnam</td>
<td>3</td>
<td>1</td>
<td>-</td>
</tr>
<tr>
<td>(Sub-total)</td>
<td>(41)</td>
<td>(5)</td>
<td>(-)</td>
</tr>
<tr>
<td>Commonwealth Asia</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>India</td>
<td>25</td>
<td>12</td>
<td>2</td>
</tr>
<tr>
<td>Sri Lanka</td>
<td>2</td>
<td>2</td>
<td>1</td>
</tr>
<tr>
<td>(Sub-total)</td>
<td>(27)</td>
<td>(14)</td>
<td>(3)</td>
</tr>
<tr>
<td>Other Commonwealth</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Fiji</td>
<td>1</td>
<td>1</td>
<td>-</td>
</tr>
<tr>
<td>Papua New Guinea</td>
<td>1</td>
<td>1</td>
<td>-</td>
</tr>
<tr>
<td>(Sub-total)</td>
<td>(2)</td>
<td>(2)</td>
<td>(-)</td>
</tr>
<tr>
<td>Africa - other</td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>South Africa</td>
<td>2</td>
<td>1</td>
<td>-</td>
</tr>
</tbody>
</table>

(continued)
<table>
<thead>
<tr>
<th>Country of qualification</th>
<th>No. of attempts at Parts I and II</th>
<th>No. of passes in Parts I and II</th>
<th>No. of passes in Part III</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Eastern Europe</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Czechoslovakia</td>
<td>1</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Hungary</td>
<td>2</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Poland</td>
<td>8</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Romania</td>
<td>2</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>USSR</td>
<td>6</td>
<td>1</td>
<td>-</td>
</tr>
<tr>
<td>Yugoslavia</td>
<td>2</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td><strong>(Sub-total)</strong></td>
<td><strong>(21)</strong></td>
<td><strong>(1)</strong></td>
<td><strong>(-)</strong></td>
</tr>
<tr>
<td><strong>Western Europe-Northern</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Belgium</td>
<td>1</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>France</td>
<td>7</td>
<td>3</td>
<td>2</td>
</tr>
<tr>
<td><strong>(Sub-total)</strong></td>
<td><strong>(8)</strong></td>
<td><strong>(3)</strong></td>
<td><strong>(2)</strong></td>
</tr>
<tr>
<td><strong>Western Europe-Southern</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Greece</td>
<td>4</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Italy</td>
<td>1</td>
<td>1</td>
<td>-</td>
</tr>
<tr>
<td><strong>(Sub-total)</strong></td>
<td><strong>(5)</strong></td>
<td><strong>(1)</strong></td>
<td><strong>(-)</strong></td>
</tr>
<tr>
<td><strong>South and Central America</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Argentina</td>
<td>3</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>Chile</td>
<td>2</td>
<td>1</td>
<td>-</td>
</tr>
<tr>
<td>El Salvador</td>
<td>2</td>
<td>1</td>
<td>-</td>
</tr>
<tr>
<td>Mexico</td>
<td>5</td>
<td>1</td>
<td>-</td>
</tr>
<tr>
<td>Peru</td>
<td>2</td>
<td>2</td>
<td>-</td>
</tr>
<tr>
<td><strong>(Sub-total)</strong></td>
<td><strong>(14)</strong></td>
<td><strong>(5)</strong></td>
<td></td>
</tr>
<tr>
<td><strong>U.S.A.</strong></td>
<td>1</td>
<td>1</td>
<td>-</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td>**164 **</td>
<td><strong>40</strong></td>
<td><strong>6</strong></td>
</tr>
</tbody>
</table>

Source: COPQ

* Number of individual candidates - 145
39. While some candidates for the theory papers can prepare in the ad hoc manner described above, the person attempting the clinical examination faces an almost insurmountable barrier. There is a virtual absence of temporary registration arrangements to allow supervised clinical experience. Until recently the Dental Board of New South Wales permitted overseas-qualified dentists to work under licence in designated State clinics as a prerequisite to full registration. In some States, female dentists have been employed by general practitioners as dental nurses to gain observational experience of Australian dentistry. The Committee is also aware of instances where dentists have trained as School Dental Therapists to gain practical experience. The School Dental Therapist works under the supervision of dentists in the Australian School Dental Scheme and performs minor dental treatment on children.

40. With one exception, there is now no provision for dentists to gain supervised practical experience with patients in order to attempt the clinical examination. The one exception is the program of the Royal Dental Hospital of Melbourne which allows two candidates who have narrowly failed the COPQ Part III examination to undergo 6 months supervised practical experience under temporary registration. The candidates must be recommended by COPQ. At the end of the training period the candidate attempts the clinical examination for the second and final time. This program commenced in 1982 and one candidate is now undergoing training. A major problem is the lack of income support for candidates.

41. The Committee is concerned that efforts to provide a bridge to recognition for candidates are fragmentary and rely heavily on the goodwill of individuals. The demand also appears to far exceed the availability of such assistance.

42. The COPQ Expert Panel in Dentistry has been constituted as an examining body only and has no powers to prepare candidates for its own examination, but the need for some form of preparation seems clear. The Committee notes from consultations the strong recommendations in this regard from the Expert Panel, the other dental authorities consulted and the candidates themselves.

43. The Committee considers that since existing immigration policy permits the entry of overseas-qualified dentists without prior recognition, albeit in small numbers, it is part of the Commonwealth Government's responsibility to try to integrate such people into the workforce. The positive contribution which such trained professionals can make to the health and well-being of their own communities has been referred to at para.2.

44. The Committee believes that some form of reorientation facility should be established as a matter of urgency to assist overseas-trained dentists to prepare themselves for the COPQ examination.
45. The Committee therefore recommends the introduction of a co-ordinated, planned program of supervised practice in dental hospitals throughout Australia to aid in the preparation of candidates for the COPQ Part III clinical examination in dentistry. To achieve this it recommends that the Minister for Immigration and Ethnic Affairs appoint a special Working Party financed by the Commonwealth which would, in conjunction with COPQ, develop further and implement a program of the kind outlined at paras 46 to 68. The Committee suggests that the Working Party:

(a) include the following interests and areas of expertise:

- Deans of Dental Schools
- Directors of dental hospitals
- State health authorities
- the field of general dental practice
- State Government organisations concerned with immigrant welfare

(b) develop and make recommendations on suitable means for providing supervised practice for candidates preparing themselves for the COPQ Part III clinical examination in dentistry, and in particular to consider:

(i) the number and cost of supervised practice positions;
(ii) liaison between dental hospital authorities and dental faculties;
(iii) liaison between supervisors and COPQ examiners;
(iv) means of monitoring progress in supervised practice;
(v) means of selecting candidates for supervised practice;
(vi) income support for candidates, and cost recovery from candidates; and
(vii) administrative machinery; and

(c) report to the Minister for Immigration and Ethnic Affairs as a matter of urgency.  

(Recommendation 69)

OUTLINE FOR FORMAL SUPERVISED PRACTICE PROGRAM

Nature

46. The following guidelines are provided for the Working Party's preliminary guidance only and should not be seen as constituting firm recommendations.
47. The Committee suggests the Commonwealth negotiate with the States for the establishment of supervised practice positions in the 5 dental hospitals, to be set aside specifically for the preparation of candidates for the COPQ examination. It is considered the Working Party could work towards an optimum of 4 positions per hospital.

48. The Committee suggests these positions form an Australia-wide 'pool' available to all candidates, on the understanding that they should be encouraged to return to their State of normal residence on completion of the supervised practice.

49. The Committee suggests that for reasons of dental and legal responsibility and liability, these positions be at final year undergraduate student level. The degree of 'hands on' practice and hours of practice should be left to the discretion of the dental director of the hospital.

50. The Committee suggests that the positions give candidates access to teaching staff and participation in tutorials and seminars either as a special group, or in concert with the training of final year undergraduate students.

51. The Committee envisages that these positions would be supernumerary, funded separately and available only to overseas dental graduates.

Conditions

52. The Committee suggests that a continuing assessment be made of candidates' progress, possibly based on the use of student log books, and their performance be reviewed at regular intervals, the purpose being:

- to monitor progress in order to justify continued occupation of the position;

- to monitor preparedness to present for the clinical examination and to ensure an optimum turnover of positions; and

- to provide an attested record of clinical experience to be taken into account by the COPQ clinical examiners at a level to be determined by the Working Party.

53. The Committee sees the average duration of supervised practice as being 12 months and, as a general rule, not exceeding 18 months.

Selection

54. The Committee suggests selection for supervised practice positions should be based on the following tests:
(a) an English competence test: the aim being to test ability to take maximum benefit from the period of practice. The Committee sees the test used for level 3 of the Australian Second Language Proficiency Ratings (ASLPR) as being an appropriate measure; and

(b) a theory and laboratory test: the aim being to ensure a satisfactory minimum level of theoretical dental knowledge and aptitude for clinical training. A pass at the current theory examination of the COPQ Expert Panel in Dentistry and a laboratory assessment of technical skills ('a dry test') would be an appropriate interim measure.

55. Since the present backlog of demand would exceed likely places (paras 61 to 63), some form of selection of the quota would need to be established at least initially. The Committee believes that selection to the quota should be based on academic merit. As an interim measure, the pass performance at the COPQ dental theory examination and, if the COPQ clinical examination has been attempted, the report of the examiners on this clinical performance could be used.

56. The Committee recognises that there are special community needs which may warrant giving special entry to the quota outside academic merit grading. It should be possible to reserve a small number of positions for candidates whose registration may ameliorate specific community needs, but whose academic performance may not have enabled them to obtain a place despite passes in English and dental theory and laboratory tests.

57. The Committee recommends that participation in the supervised practice program be optional, and that candidates of exceptional ability or from comparable dental training systems to those in Australia remain free to proceed directly from the COPQ theory examination to the COPQ clinical examination.

(Recommendation 70)

Costs

58. The Committee has been made aware that the majority of candidates for supervised practice positions will require income support if family circumstances are not to present grave barriers. The Committee is, however, at the same time conscious of the probability that after registration, candidates will have a better than average earning capacity and also that the Government is currently endeavouring to restrain public sector spending through application of the 'user pays' principle, that is optimum user contribution to services.
Accordingly, the Committee recommends that income support be made available for candidates taking part in the supervised practice program (Recommendation 69) at a level equivalent to unemployment benefit ($6250 per annum), such support being made available in the form of a non-interest bearing loan:

- to be repaid within 4 years of registration;
- the granting of the loan to be determined by COPQ;
- the loan and repayment to be administered by the Commonwealth Department of Education or other appropriate body on behalf of COPQ; and
- repayment of the loan to be monitored by COPQ.

(Recommendation 71)

The Committee considers it may also be necessary, in order to secure the availability and quality of supervised practice positions, for the Commonwealth to provide special funds to the States for this purpose. The Committee sees such special support as being in the region of $5000 per annum per position.

Backlog

It has been difficult for the Inquiry to establish the number of individuals who might choose to make use of a period of supervised practice. Many individuals are isolated and/or have not yet approached COPQ; only some have formed themselves into identifiable lobby and support groups. The Committee estimates the backlog of candidates likely to be applicants for supervised practice positions as approximately 50.

The majority of the backlog appears to be in Victoria where, with the exception of two positions at the Royal Dental Hospital of Melbourne, no other training avenues are available to candidates other than commencing undergraduate studies afresh. In New South Wales, where there are more extensive training facilities, some candidates have obtained undergraduate places at the Faculty of Dentistry of the University of Sydney.

Assuming that 50 candidates qualify for supervised training of an average length of 12 months each, then the 5 States with dental training facilities would require 4 training positions each to overcome the backlog in a realistic time, that is 2.5 years.
Statistics provided to the Committee by DIEA indicate that the ongoing demand will be low.

Since the establishment of the COPQ dental examination in 1978 the immigration of dentists to Australia has been falling. From a figure of 120 in 1977-78 the figure has now about halved to a figure of 63 in 1981-82 (see Appendix VII).

Immigration statistics are collected on the basis of the settler's (immigrant's) country of last residence. Settler figures for country of qualification of overseas dentists are not available. Statistics since 1977/78 show that approximately 40 per cent of the dentists arriving as settlers annually were from the reciprocity countries, the United Kingdom, Eire and New Zealand. However, there is reason to believe that the number with automatically registrable qualifications is a much higher proportion than this and that persons with United Kingdom dental qualifications also arrive here from non-reciprocity countries and receive automatic registration.

Working from the estimated backlog figure of 50, and assuming that it has developed over a period of some 10 years, the Committee considers an annual entry rate of persons with unregistrable dental qualifications of about 5 per annum to be realistic.

---

*CALFRIC : Committee for Allocation of Loans for Refugees from Indo-China. The Committee understands that the repayment rate is 90 per cent.*
68. If we assume that all these 5 will have qualified in non-reciprocity countries, then the annual number of arrivals possibly requiring supervised practice at some time in the future could be said to be 5. However, some of the 5 may hold reciprocity country qualifications and some, possibly spouses, may also not intend to practise their profession.

CONDUCT OF THE COPQ EXAMINATION

69. Reference has already been made to the psychological barrier which the COPQ examination appears to represent to many people. However, criticisms of the examination centred not upon its content but upon its conduct. Many of the 20 overseas-qualified dentists interviewed by the Committee considered the standard of the examination to be reasonable, and were concerned mainly with discussing ways in which they could receive training and clinical experience to attain the knowledge and skills required to pass the examination.

70. The Committee noted that the Expert Panel in Dentistry had subjected the written examination to a validity check on 3 occasions between 1974 and 1976, and the results obtained by Australian practitioners and final year students had been used as a means of establishing the pass standard to apply to overseas dentists. It was also noted that the services of the Australian Council for Educational Research (ACER) had been used to validate the questions.

71. Statistics provided to the Committee by COPQ showed that of the 145 persons who sat Parts I and II of the examination concurrently, the number failing was 105. It was found that 42 of these failures, or 40 per cent, occurred because of failure at Part I, the English examination.

72. The Committee considered it inequitable that about one in 3 candidates, whose English was insufficient to meet the requirements of the Part II dental theory papers, should have been required to sit Parts I and II as a joint examination. Those candidates who may have marginally failed Part I and wished to present for the examination again had therefore already used one of their two allowable attempts at Part II. Another matter of concern to the Committee was that candidates from non-English speaking countries sit a longer examination over the 3 day period (5 papers) than candidates from English speaking countries (4 papers) who are not required to sit Part I. The Committee considers that candidates who fail the English test on their first attempt should not in consequence have to use one of their allowable opportunities to sit the Part II examination. The Committee therefore recommends that the English examination be separated from the theory examination and that a satisfactory English pass be a prerequisite for sitting the theory papers, and further that the standard of English to be tested be clearly established as recommended in para. 44 of Chapter 7.

(Recommendation 72)
73. The clinical examination was criticised as being too difficult for persons who had not had the opportunity to practise their profession for some time and were unfamiliar with Australian standards of dental practice.

74. The Committee's outline for a formal supervised practice program to enable candidates to prepare for the clinical examination is shown above at paras 46 to 68. In addition to the need for a program of supervised practice as essential to enable candidates to prepare for the clinical examination, the Committee considered that a general review of the overall examination procedure used in dentistry, and a specific review of the clinical examination, were warranted.

75. The Committee therefore recommends that the Minister for Immigration and Ethnic Affairs appoint a Task Group of independent experts to undertake, in conjunction with COPQ, a review of the dental examination. The Committee suggests that the guidelines of this Task Group be as follows:

(a) to include:
- a representative of Deans of dental schools;
- a dental educationist;
- an educational testing expert from outside the field of dental education; and
- a representative of community interests drawn from outside the dental profession;

(b) to take into account material produced to this Inquiry by way of submissions, evidence presented in consultations, and Secretariat research; and

(c) to report to the Minister for Immigration and Ethnic Affairs as a matter of urgency.

(Recommendation 73)

76. Candidates failing the COPQ examinations twice are normally excluded from further attempts. However, the Committee noted that the Expert Panel considers all requests for third attempts on their merits and in some cases permits the candidates to sit again. The Committee noted that a maximum of 3 attempts is permitted at the examinations of the Australian Medical Examining Council (AMEC). The Committee recommends that 3 attempts at the COPQ dental examinations be allowed in future in lieu of the present two.

(Recommendation 74)
77. Some submissions were critical that candidates do not have a formal right of appeal against decisions of the COPQ Expert Panel in Dentistry. While the Committee is aware that the Panel considers appeals on an informal basis, it is considered that all candidates should be given rights in this regard and appropriate formal machinery established.

78. The Committee considers that in carrying out the recommendations on an appeal process in paras 35 to 40 of Chapter 10, COPQ give special attention to an appeal process for overseas-qualified dentists sitting the examinations of the COPQ Expert Panel in Dentistry.

RECIPROCITY

79. Under all State and Territorial Dental Acts, a dentist with a primary qualification gained in the United Kingdom, Eire or New Zealand obtains automatic recognition of qualifications. This removes many barriers to immigration and/or employment in Australia and, in turn, Australian primary qualifications are given reciprocal recognition in those countries, thereby easing opportunities for employment of Australian dentists in the United Kingdom, Eire and New Zealand.

80. This reciprocity is a tradition which springs from the history of dental education in Australia. In 1908 the Dental Board of Great Britain investigated the possibility of reciprocity with the Boards of other Empire countries. Subsequently, the British Board agreed to accept Australian, New Zealand and South African dental degrees as a basis for registration provided that the courses were reassessed from time to time. Later the degrees of Malta, Singapore and Malaysia were also accredited by the United Kingdom.

81. Representatives of the United Kingdom General Dental Council (GDC) inspect Australian dental schools at extended intervals. However, formal arrangements do not exist for Australian dental authorities to carry out reciprocal inspections.

82. The Committee found it difficult to see how reciprocity could be defended by contending that GDC accreditation is the mark of equal standards, when dental schools in Malta, Singapore and Malaysia, are also accredited by the GDC but graduates of those schools are denied automatic recognition in Australia.

83. While Australian boards now provide automatic recognition to United Kingdom, Eire and New Zealand degrees only, a number of other countries were, until recently, also recognised, but on a non-reciprocal basis. The recognition was granted on the recommendations of the COPQ Expert Panel in Dentistry which carried out numerous inspections of overseas
dental schools in earlier years. For example, the dental degrees of schools in Canada, Denmark, Finland, Norway, Sweden, the United States and West Germany were recognised by the Dental Board of Victoria until recently.

84. In its consultations with the dental profession the Committee found no consistent view on the question of reciprocity. Some dentists who had themselves undergone postgraduate training in the United Kingdom favoured its retention. However, others considered that if it were revoked, then the possible imposition of a competency examination by the United Kingdom dental authorities would not deter the younger, recently-trained dentist wishing to augment his experience. The Deans of 4 Australian dental schools considered that Australia had little to lose by withdrawing reciprocity, and much to gain by requiring individual tests of competence of all dentists wishing to migrate to Australia. Some pointed out that the recognition of dentists on the basis of their school of graduation alone can be misplaced as a good graduate from an inferior school can be more proficient than a graduate of a highly reputed school.

85. The Committee could find no compelling evidence in the submissions presented to it or in its consultations for the retention of the discrimination between different groups of settlers in Australia which automatic recognition of some overseas dental qualifications produces. The Committee records its view that it firmly opposes this discrimination and recommends its removal. The Committee is conscious that relationships with other countries are involved and that the matter needs to be handled diplomatically to ensure that, so far as possible, any benefits Australians receive by virtue of the automatic recognition arrangements are preserved.

86. The Committee recommends that the Commonwealth Government ensure that the question of the continuing existence of reciprocity in relevant Commonwealth and State Acts, and hence discrimination, is considered at the next Conference of Commonwealth and State Ministers for Health and that the Ministers carefully examine the balance of the benefits said to attach to reciprocity against the cost to the whole community of continuing such discrimination and, further, that the Conference of Commonwealth and State Ministers for Immigration and Ethnic Affairs should keep this matter under review.

(Recommendation 75)
CHAPTER 14
RECOGNITION PROCEDURES IN PHYSIOTHERAPY

INTRODUCTION

1. The profession of physiotherapy is a relatively young health care discipline in which the mode of practice has evolved gradually over a period of years and therefore, it can differ substantially from country to country. In less well developed countries it may be geared to diseases and conditions prevalent in such parts of the world and may also be based on different concepts of the profession.

2. In a submission received by the Committee (375) it was noted that the standard of physiotherapy practice in Australia is high and, in some areas of the profession, particularly well developed. Consequently graduates of some overseas courses that may not include the type of work which would be expected of a physiotherapist in Australia, may experience difficulties in meeting Australian standards. Some of these difficulties may be overcome by appropriate retraining.

3. The maintenance of the standards of the profession in Australia has been ensured in recent years by the licensing requirements of the registration boards which exist in the States and the A.C.T. Legislation is still awaiting passage in the Northern Territory. The boards take their authority from the legislation which established them.

4. Each State board may impose its own requirements on overseas-qualified persons seeking registration; however, graduation from approved programs from the United Kingdom, Canada, South Africa and New Zealand are automatically registrable. Holders of qualifications from specific institutions in certain other countries (Denmark, Netherlands, Hong Kong and South Africa) are exempt from the written examination procedure.

THE AUSTRALIAN EXAMINING COUNCIL FOR OVERSEAS PHYSIOTHERAPISTS (AECOP)

5. In 1980 a body known as the Australian Examining Council for Overseas Physiotherapists (AECOP) was incorporated in the A.C.T. It is composed of representatives of State registration boards, the Australian Physiotherapy Association, and schools of physiotherapy. This body took over all responsibility for carrying out testing procedures to ensure that overseas-qualified persons meet the standards of the registration boards. It is supported by a small secretariat of two officers within the Committee on Overseas Professional Qualifications (COPQ).
Assessment of Overseas Physiotherapists

6. Since 1975 there have been uniform procedures agreed to by all the registration boards for testing the competence of those individuals who are not immediately registrable.

7. The procedures which must be successfully completed by an overseas-qualified physiotherapist to achieve registration in Australia are:

(a) examination of English language proficiency if first language is not English;
(b) written examination of knowledge of physiotherapy;
(c) a period of supervised training in an approved hospital in Australia; and
(d) a practical examination

8. The Committee did not receive a large number of submissions concerning physiotherapy. All 6 of those received from individuals or organisations on this subject supported the need for testing procedures for overseas-qualified physiotherapists who wish to practise in Australia.

9. Most of the submissions from organisations were in favour of the present machinery being retained. Only one, from AECOP itself, (374) pointed out certain difficulties with the system.

10. One submission was received from an individual on behalf of a physiotherapist with overseas qualifications who had sought registration in Australia (431). The main difficulties mentioned in this submission, that is quality and accuracy of information provided overseas and difficulties with securing a position in an approved hospital to undertake the compulsory period of supervised practice, were also raised by overseas-qualified physiotherapists who gave evidence to the Committee during consultations held in Sydney on 13 August 1982.

11. These and other issues which were raised in the submissions and at the consultations will be examined in the following paragraphs concerning the AECOP procedures.

THE AECOP PROCEDURES

Eligibility

12. The first issue raised concerns exemptions from and eligibility for the written examination. Some of the former candidates who had sat for the examination, although accepting that some form of screening was necessary, mentioned their
surprise and disappointment at learning that their qualifications and experience were not immediately acceptable in Australia.

13. One witness who gave evidence to the Committee at the consultations held in Sydney on 13 August 1982, thought that as her qualifications are accepted in the United Kingdom, and United Kingdom qualifications and therefore standards are accepted in Australia, it is anomalous that she should not be able to register automatically in Australia. This problem also arises in medicine (see Chapter 12). However, the situation is not directly comparable to the medical profession because physiotherapy courses in Australia are not accredited by the United Kingdom bodies.

14. In fact the overseas courses which are recognised by AECOP are currently under review, and it is expected that eventually all physiotherapists with overseas qualifications will be required to take the examination. This action results from AECOP's realisation that it is not possible to judge the competence of each individual on the basis of the institution at which the course was taken and the fact that the quality and content of each course may vary over time.

15. A more difficult problem is faced by those who are ineligible to sit the examination because they fall short of the requirements, especially if they have no real choice about coming to Australia, for example refugees or accompanying spouses. The requirements are:

(a) the course in physiotherapy undertaken must be sufficiently similar in theory and practice aspects (including clinical hours) to the physiotherapy curriculum undertaken in Australia;

(b) the course in physiotherapy must have included an electrotherapy component;

(c) the course in physiotherapy must qualify the candidate to practise as a physiotherapist in the country in which the course was taken; and

(d) the candidate must have completed at least two years full-time postgraduate clinical practice, or the part-time equivalent, within 3 years of the date of application.

16. The rationale for stringent eligibility criteria is that applicants from countries which have dissimilar courses would fail the entrance examination in any case and would require substantial retraining to be able to register in Australia.
It was brought to the Committee's attention that certain Eastern European refugees do not generally satisfy the present criteria. However, AECOP has recently decided to allow them to attempt the examination. The Committee commends this initiative, as even if candidates are unsuccessful, they will have a clearer understanding of the standards required for registration and of any extra study which will need to be done.

In some cases the courses undertaken in the country of origin may be so dissimilar to the Australian curricula that unsuccessful candidates may need to undertake a full undergraduate course rather than make another attempt at the screening procedures.

Figures obtained from the Commonwealth Department of Immigration and Ethnic Affairs (DIEA) show that very few physiotherapists entered Australia in the family reunion or refugee categories during 1979-80 and 1980-81. Thus this problem is not widespread at present. The Committee considers that each individual case will need to be approached differently and that the measures suggested for improving counselling should assist such people. (See paragraphs 33 and 34).

The Written Examination

The written examination consists of two papers of about 150 multiple choice questions each, requiring approximately 3 hours to complete. It is designed to test knowledge in the principal fields of physiotherapy as practised in Australia. One paper covers theoretical aspects and the other relates to the practice of physiotherapy.

Only two attempts at the examination are allowed. A second attempt may be denied by the Committee if the candidate failed badly the first time. The Committee noted that AMEC candidates are allowed a maximum of 3 attempts.

The Committee recommends that AECOP candidates be allowed 3 attempts at the examination in lieu of the present two.

Candidates whose first language is not English may also be given a language proficiency test. The English test used is the general one devised by COPQ for professionals. It lasts approximately 3 hours. Those who are unsuccessful the first time must pass before proceeding with any further screening. There is no formal limit on the number of attempts that may be made at the English test.
24. The screening examinations are usually administered at DIEA overseas posts although they may be attempted in any capital city in Australia by those already granted residency such as spouses of immigrants admitted for permanent residence or refugees. The physiotherapy examinations are offered no more than twice a year, but the English language tests are held more frequently.

25. The Examination Sub-Committee of AECOP is responsible for setting the questions for the physiotherapy examination and for having them validated with students and practising physiotherapists. The level of knowledge is expected to be that of first year beginning practitioners in Australia. Questions are updated as deemed necessary by the Sub-Committee.

26. All 4 individuals interviewed by the committee who had sat for the examination felt that some form of testing was reasonable. Those whose first language was not English agreed that fluent English was necessary to practise in Australia. One candidate however, felt that weight should also be given to the ability to work as a bilingual health professional.

27. The main criticisms of the written physiotherapy test were:

(a) candidates are not given full and accurate information about the procedures;

(b) candidates are not informed of their marks obtained in the examination;

(c) in some cases the physiotherapy examination and the English language test are given on the same day which is exhausting for candidates; and

(d) the degree of difficulty of the questions appears to vary.

Counselling

28. The issue of counselling and provision of information about the path to registration in Australia has already been raised in relation to medicine and dentistry and has been treated separately in Chapter 8.

29. In the case of physiotherapy, the greatest problems appear to arise in relation to the supervised practice requirement and this is dealt with below. However, the Committee considers there could be improvement in the quality of information provided to candidates for the written examination.
30. For example, it would be helpful to candidates to know
the standard expected of them and the type of questions they
might be asked. Suggestions for background reading material
and an information booklet about the practice of physiotherapy
in Australia such as that provided to dentists would also be
useful. Candidates should be told at the time of application
of the likely cost of the whole procedure, that is, $50.00 for
the written exam; $250.00 for the clinical examination and
about $100 for registration.

31. It is essential that migration officers at DIEA overseas
posts are kept informed of any changes to the requirements and
similarly that the Department's regional offices dealing with
enquiries have up-to-date information. A special difficulty
with physiotherapists wishing to enter Australia is that many
are accompanying spouses and thus their needs may be
subordinated to those of the main breadwinner. The Committee
believes it is important that proper counselling about the
recognition of their qualifications should be available to all
family members to enable the family as a whole to make an
informed decision about migration.

32. It would also seem fair and reasonable to give
candidates more information about their results. The Committee
understands that AECOP is currently revising its procedure for
notifying candidates within Australia of their performance.
Overseas candidates should also have the right to know how well
or how badly they had performed and to be told that they may
make 3 attempts at the examination.

33. At present an informal system of counselling those who
fail the written examination is available to candidates in
Australia. The candidate may be referred to a member of AECOP
in the appropriate State or Territory. As this face-to-face
contact appeared to be most valuable to the witnesses who gave
evidence to the Committee, it is suggested that the system be
formalised within COPQ and brought to the attention of
candidates within Australia who fail the examination.

34. The Committee recommends that COPQ ensure that its
counselling procedures are adequate for all overseas-qualified
physiotherapists applying for or undertaking the examinations.

(Recommendation 77)

Conduct of the Written Examination

35. The conduct of the written examination is delegated to
officers of DIEA, who see the administration of these tests as
additional to their main duties.
36. Considerable work is involved in liaising with candidates and AECOP, arranging accommodation and invigilators for the examinations, collecting fees, dealing with enquiries and passing on results. This work has not been recognised as an important and valid part of the selection process. The Committee considers that it would be worthwhile for DIFA to recognise its importance, and to devote some resources to examining how the testing processes for other occupations as well as physiotherapy could be streamlined without disadvantaging candidates.

Content of the Written Examination

37. Compared with medicine and dentistry, the Committee received very little criticism of the AECOP written examination. However, when the Committee carried out an analysis of the average pass rates for all candidates who had sat each of the written examinations, the physiotherapy test appeared to be more stringent than the test set by the Australian Medical Examining Council (AMEC), although less so than the dentistry test. The results are given below, broken into pass rates for candidates sitting the tests overseas and those sitting in Australia.

<table>
<thead>
<tr>
<th></th>
<th>Medicine per cent</th>
<th>Dentistry per cent</th>
<th>Physiotherapy per cent</th>
</tr>
</thead>
<tbody>
<tr>
<td>Candidates in Australia</td>
<td>62</td>
<td>31</td>
<td>63</td>
</tr>
<tr>
<td>Overseas candidates</td>
<td>44</td>
<td>26</td>
<td>26</td>
</tr>
<tr>
<td>Average pass rate all candidates</td>
<td>58</td>
<td>28</td>
<td>39</td>
</tr>
</tbody>
</table>

Source: COPQ

38. The Committee noted that candidates sitting the physiotherapy test overseas have a low performance average. It has been suggested that the wide divergence of standards in overseas countries could account for this, but the selection of candidates according to stringent eligibility criteria ought to ensure a higher pass rate. The Committee considers that adequate counselling before the examination should help to improve performances.

Need for a Period of Supervised Practice

39. The compulsory period of supervised practice is seen as a very important component of the screening procedures. The AECOP believes that it is the main reason for the high success
rate in its practical examination - an average of 76 per cent for all candidates compared with 29 per cent for medicine and 17 per cent for dentistry.

40. Candidates who are successful at the written part of the examination are advised that they must work for a period on average of 6 months in an approved Australian hospital. They are supplied with a list of about 35 approved hospitals and no further contact is made by AECOP until the candidate advises that employment has been obtained.

41. Unfortunately there are no particular positions earmarked for overseas-qualified physiotherapists wishing to fulfil the AECOP requirement. Because of restrictions on budgets and staff numbers, few hospitals can afford to employ additional trainees, particularly if they are likely to require special attention or if their language skills are inadequate. Some approved hospitals will not even take on the trainees without pay, or at reduced wages.

42. The overseas-qualified physiotherapists who gave evidence to the Committee were all highly critical of the arrangements for the period of supervised practice. One person had written to the 35 hospitals on the list and received 31 negative replies. The remainder had offered work without pay: a difficult requirement for those without adequate means of support.

43. The AECOP examination results show that 33 per cent of those passing the written section failed to attempt the clinicals. Most had sat the written section overseas. An indication of the problems and frustrations experienced by these people can be gained from this extract from a submission to the Committee by a physiotherapist with a West German qualification:

I'm furious and disappointed. As you know it's the third year of my attempts, costs and troubles of interviews and medical exams twice and so on. I had contacted various hospitals already last year to find out about a vacancy, but as I told you they haven't got any, can't foresee the situation in a few months or simply are not willing to promise anything until immigration becomes effective and they can deal personally with me. (431)

44. The AECOP has also pointed out the difficulties experienced by overseas applicants due to lack of facilities for supervised practice. To date AECOP's role has been confined to providing candidates with lists of approved hospitals and has not extended to interceding with the hospital authorities on behalf of overseas candidates.
45. The Committee recommends that COPQ, through AECOP, take steps to formalise arrangements for supervised practice for overseas candidates and that COPQ delegate the supervision of the period of supervised practice to the appropriate School of Physiotherapy, which should:

(a) enrol the therapist as a miscellaneous student in order to undertake the supervised clinical practice;
(b) maintain liaison with approved hospitals to ensure that appropriate staff are willing and able to assist;
(c) assist supervisors in hospitals to plan and execute individualised training programs; and
(d) counsel physiotherapists on any other related problems.

(Recommendation 78)

46. Following consideration of the difficulties raised in relation to the period of supervised practice, the Committee recognised the need for some financial support to be provided for candidates and hospitals undertaking training. The type of program to be arranged will be similar to that recommended for medicine and dentistry, except that the amount required for each training position will be $2,500 rather than $5,000 as the period of supervised practice will last for 6 months rather than 12.

47. The Committee recommends that the Commonwealth Government make arrangements for income support by way of repayable loan to be made available to trainees and provide special funds to the States, earmarked for COPQ physiotherapy candidates, at the rate of $2,500 per training place.

(Recommendation 79)

Backlog

48. It has been difficult for the Inquiry to establish the number of individuals who might choose to make use of a period of supervised practice. Many individuals may have decided not to pursue their original career, or have not yet approached AECOP; some may have returned to their country of origin. The Committee estimates the backlog of candidates at present to be small, probably 30 persons at the most.
49. Of this total, one third is conservatively estimated as not being capable of achieving registration because of inability to learn English, inadequate training, inadequate ability or long absence from practice. Therefore the total number expected to use a supervised practice program is 20. In the absence of official figures, this is a Secretariat estimate.

50. The number of hospitals throughout Australia approved by AECOP for supervised practice is 35 while Australian institutions produce about 400 to 450 graduates each year. The Committee considers that it would be manageable to overcome the backlog in two years, that is 10 students undergoing a period of on average 6 months supervised practice each year. The implications of this for funding are:

<table>
<thead>
<tr>
<th>COST (based on an average of 6 months per position)</th>
<th>$</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cost per individual</td>
<td></td>
</tr>
<tr>
<td>income support</td>
<td>3 130</td>
</tr>
<tr>
<td>hospital subsidy</td>
<td>2 500</td>
</tr>
<tr>
<td>TOTAL</td>
<td>5 630</td>
</tr>
<tr>
<td>Recovery of income support</td>
<td></td>
</tr>
<tr>
<td>(based on CALFRIC performance 90%)*</td>
<td>2 800</td>
</tr>
<tr>
<td>Net cost to Commonwealth</td>
<td>2 830</td>
</tr>
<tr>
<td>Backlog</td>
<td>x 20</td>
</tr>
<tr>
<td>Total for backlog, say</td>
<td>56 600</td>
</tr>
<tr>
<td>Over 2 years, per annum about</td>
<td>28 300</td>
</tr>
</tbody>
</table>

Ongoing Demand

51. Information provided to the Committee by DIBA suggests that ongoing demand will be comparatively low. However, under present policy and procedure it is difficult to predict in fine detail this ongoing demand. In this context ongoing demand refers only to new arrivals and not to backlog cases.

*CALFRIC: Committee for Allocation of Loans for Refugees from Indo-China. The Committee understands that the repayment rate is 90 per cent.
52. In recent years the migration of physiotherapists has remained steady. Since June 1979 between 30 and 40 persons per annum have been recorded by DIEA as physiotherapist settler arrivals. Most of these have been recorded in the labour shortage category.

53. Apart from labour shortage, entry is in the 3 main categories of family migration, special eligibility and refugees. The majority entering under special eligibility represent the trans-Tasman movement and in most cases, these persons hold registrable New Zealand or United Kingdom qualifications. Advice from DIEA is that few refugees with physiotherapy qualifications have been selected in recent years. Thus the majority of persons with unregistrable physiotherapy qualifications would appear to enter within the category of Labour Shortage or as dependents within the Labour Shortage category. About 65 per cent of all those arriving come from countries awarding qualifications immediately recognised in Australia.

54. The Committee estimates an annual entry rate of persons with unregistrable qualifications of about 12 per annum. Adjusting this figure on the same basis for viability as the figure for backlog (see para. 50 above), the ongoing demand is estimated at about 8 per annum.

55. On this basis the net ongoing cost to the Commonwealth would be approximately $20,000 per annum. It is emphasised that this figure is based on assumptions and estimates and is only intended as a guide to the cost of providing an ongoing program of supervised practice.

The Practical Examination

56. The main criticism received of the practical examination, from one of the witnesses who gave evidence to the Committee, was that it puts stress on the candidate who therefore may not perform as well as usual. It was suggested that a supervisor's report following a period of probation would be preferable.

57. AECOP considers that the practical examination should be retained and the Committee concurs. The written examination is not able to test actual techniques, or provide the setting in which the candidate will be required to perform if licensed. A supervisor's report on a period of probation would introduce possible bias into the system. The examination by independent experts is seen as the most reliable and fair way to judge individual competence.

58. The Committee believes however, that some candidates who have passed the written test well, and whose training and skills are of a standard similar to those of Australian practitioners, should be able to take the practical examination without completing the qualifying period of supervised practice.
59. Candidates should be informed of this facility and should be advised to seek counselling from their hospital supervisor and local member of AECOP. A candidate who fails the challenge attempt would forfeit one of the two chances to take the examination and would be required to complete the full term of the supervised practice before making another attempt.

60. The Committee recommends that COPQ enable certain candidates from those countries where programs are similar to Australia's to undertake the practical examination without completing the full period of supervised practice.

   (Recommendation 80)

61. The Committee considers that unsuccessful candidates of the practical examination should have access to the same counselling facilities which have been recommended for all overseas-qualified physiotherapists undertaking the examinations (see paragraphs 28 to 34, and 45).
CHAPTER 15
RECOGNITION PROCEDURES IN PROFESSIONAL ENGINEERING

INTRODUCTION

1. The term engineer is often used to describe a range of occupations from tradesman level through to the level of university-educated professional engineer. The Institution of Engineers, Australia, defines professional engineering as the responsible practice of engineering by persons who have attained a level of education and experience accepted by a consensus of its practitioners. Engineers who have reached the prescribed level of education and professional experience provide the technical and managerial skills necessary to establish the conceptual and synthetic basis for engineering projects, to determine what is technically feasible and how the various technical aspects of a project relate to one another, to co-ordinate the activities of the human and other resources employed, to estimate, control and account for the necessary expenditure of effort and materials and so match the aims of their activities to the needs of society.

2. Under the Professional Engineers Award determined by the Arbitration Commission a qualified engineer is defined as a person who is qualified to become a graduate member of the Institution of Engineers, Australia. The Australian Public Service Board specifies for eligibility for appointment to the position of engineer qualifications which would admit to graduate membership of the Institution of Engineers, Australia, or other qualifications which, in the opinion of the Board, are appropriate for the efficient discharge of the duties of such a position.

3. Engineering is not a profession which requires individual practitioners to be regulated by law, although there is a legal requirement for some types of consulting engineer to be registered in Queensland. The profession in Australia is thus self-regulatory, with most of the regulating functions such as accreditation of courses, recognition of qualifications and monitoring of standards being carried out by the Institution of Engineers, Australia. The Institution has resisted any suggestion that engineers should be regulated by legal registration, as is the case in the USA and Canada. This is because the Institution believes that regulation should be the responsibility of the professional body.

4. As has been noted elsewhere, the health professions considered by the Committee are subject to regulation of individual practitioners by law. This difference has led to the application of different assessment methods. In the legally regulated professions applicants for registration are assessed and recognised by government bodies. In the non-regulated professions applicants for recognition are assessed by professional associations.
5. The legal registration requirement provides a fixed frame of reference defining standards of professional practice which will apply in Australia, and also gives some measure of control which may be exercised by governments on behalf of the community they serve. Legal controls are seen as necessary in the health care professions because clients do not have sufficient knowledge to apply the 'buyer beware' principle. Engineers are not required to be legally certificated but there are various controls which govern their practice and make it less necessary for their clients to be protected by law. For example, junior engineers are supervised by senior engineers, and competition in the market place helps to ensure competence and efficiency at higher levels. Companies carrying out jobs involving engineering are bound by contracts which specify minimum safety standards often based on legal requirements. Clients employ their own engineers who monitor the quality of the work being undertaken on their behalf.

6. 'Registration' for most professional engineers consists of securing membership of the Institution of Engineers, Australia. Membership of the Institution is not a prerequisite for obtaining employment. However, most employers, especially in the government sphere, require proof of acceptable academic qualifications and appropriate experience before engaging a professional engineer.

7. Recognition by the Institution is usually a prerequisite for immigration to Australia in the labour shortage category. The Institution has authority to assess qualifications gained overseas under By-law 19 of its Charter. Applicants may obtain an assessment of their credentials from the Institution, without obligation to apply for membership.

ASSESSMENT PROCEDURES

Existing methods of assessment

8. The Institution has two sub-bodies which are responsible for assessing overseas qualifications: a Board of Examiners and a Foreign Qualifications Committee (FQC). The Board of Examiners is a policy body and the FQC carries out actual assessments.

9. An individual seeking assessment of an overseas engineering qualification must submit details of the course of study completed on the appropriate form. The information is scrutinised either by the secretariat or by the FQC and, on the basis of knowledge and experience of the staff, a decision is made as to whether the course itself is acceptable, unacceptable, or in doubt and requiring a test by examination.

10. The FQC is responsible mainly for qualifications gained in European countries, together with some from South America. Table 1 shows a sample of assessments carried out by the FQC recently, in relation to country of qualification and outcome of the assessment.
Table 1

FOREIGN QUALIFICATIONS COMMITTEE: ASSESSMENTS
BY COUNTRY OF ORIGIN

<table>
<thead>
<tr>
<th>Country of Qualification</th>
<th>Result of Assessment</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Acceptable</td>
</tr>
<tr>
<td>ARGENTINA</td>
<td>10</td>
</tr>
<tr>
<td>AUSTRIA</td>
<td>2</td>
</tr>
<tr>
<td>BELGIUM</td>
<td>2</td>
</tr>
<tr>
<td>BRAZIL</td>
<td>1</td>
</tr>
<tr>
<td>BULGARIA</td>
<td>1</td>
</tr>
<tr>
<td>CHILE</td>
<td>4</td>
</tr>
<tr>
<td>COLOMBIA</td>
<td>1</td>
</tr>
<tr>
<td>CZECHOSLOVAKIA</td>
<td>18</td>
</tr>
<tr>
<td>DENMARK</td>
<td>5</td>
</tr>
<tr>
<td>FINLAND</td>
<td>1</td>
</tr>
<tr>
<td>FRANCE</td>
<td>4</td>
</tr>
<tr>
<td>GERMANY</td>
<td>24</td>
</tr>
<tr>
<td>GREECE</td>
<td>1</td>
</tr>
<tr>
<td>HUNGARY</td>
<td>7</td>
</tr>
<tr>
<td>ITALY</td>
<td>14</td>
</tr>
<tr>
<td>NETHERLANDS</td>
<td>10</td>
</tr>
<tr>
<td>NORWAY</td>
<td>1</td>
</tr>
<tr>
<td>POLAND</td>
<td>177</td>
</tr>
<tr>
<td>PORTUGAL</td>
<td>3</td>
</tr>
<tr>
<td>ROMANIA</td>
<td>10</td>
</tr>
<tr>
<td>EL SALVADOR</td>
<td>1</td>
</tr>
<tr>
<td>SPAIN</td>
<td>1</td>
</tr>
<tr>
<td>SWEDEN</td>
<td>4</td>
</tr>
<tr>
<td>SWITZERLAND</td>
<td>7</td>
</tr>
<tr>
<td>U.S.S.R.</td>
<td>70</td>
</tr>
<tr>
<td>YUGOSLAVIA</td>
<td>7</td>
</tr>
</tbody>
</table>

TOTAL                       | 385        | 98             | 10                  |

Source: Institution of Engineers, Australia.
11. All overseas qualifications not assessed by the FQC are assessed by a secretariat operating under guidelines established by the Board of Examiners. The secretariat assesses about four-fifths of all enquiries. Both assessment methods take into account academic qualifications, professional knowledge and experience. A range of assessing methods is adopted for this purpose, including evaluation of documents showing qualifications and experience, a professional interview and a test by examination.

12. Faced with the task of evaluating many different types of engineering qualifications, from hundreds of different overseas bodies, the Institution first examines the content of the course and the length of time each subject was pursued.

13. Those doing the assessing decide whether a qualification is 'acceptable' or 'unacceptable' on the basis of their own, or others' knowledge of the reputation of the institution from which the qualification was obtained. It was submitted by the Institution that this knowledge is kept up to date mainly by visits of Australian engineers overseas and the study of appropriate publications. An applicant whose basic course would normally be judged 'unacceptable' might have a qualification accepted on the basis of some higher studies at an institution whose courses would normally be judged acceptable.

14. When there is doubt as to the content and depth of the course undertaken by an applicant, additional criteria are used such as the type and quality of experience gained by the applicant since graduation and the period of time spent employed as a professional engineer. This may be judged on the basis of a curriculum vitae submitted by the applicant, or on the basis of a professional interview by members of the Institution. These additional criteria are usually used only for applicants who are in Australia.

15. Test by examination is another method used to judge whether an applicant's qualification is acceptable for membership of the Institution. To be eligible for the examination applicants must be considered professional engineers in their country of origin and provide some evidence that their qualification may be worthy of acceptance by the Institution. The test by examination is given to those who have qualifications from bodies not known by the Institution, usually located in South East Asia, the Middle East and some South American countries.

16. Table 2 shows the results of assessments carried out by the Institution over the 3 year period from 1979 to 1981. From this table it will be noted that the rate of referring to a test by examination by the FQC is on average 2.2 per cent. It should be recalled that the FQC handles mainly applicants who qualified in Europe. By contrast, the secretariat has an average rate of referring to a test by examination of
29.5 per cent. This difference suggests that the procedure in practice discriminates against non-Europeans because it provides for no assessment of their training institutions and refers large numbers of them to a test by examination. It would seem likely that this places non-Europeans, through no fault of their own, at a real disadvantage.

Table 2

<table>
<thead>
<tr>
<th></th>
<th>1979</th>
<th>1980</th>
<th>1981</th>
</tr>
</thead>
<tbody>
<tr>
<td>Acceptable</td>
<td>89</td>
<td>236</td>
<td>368</td>
</tr>
<tr>
<td>Not Acceptable</td>
<td>38</td>
<td>97</td>
<td>95</td>
</tr>
<tr>
<td>Test by Exam</td>
<td>3</td>
<td>5</td>
<td>13</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>130</strong></td>
<td><strong>338</strong></td>
<td><strong>476</strong></td>
</tr>
</tbody>
</table>

Foreign Qualifications Committee

<table>
<thead>
<tr>
<th></th>
<th>1979</th>
<th>1980</th>
<th>1981</th>
</tr>
</thead>
<tbody>
<tr>
<td>Acceptable</td>
<td>300</td>
<td>355</td>
<td>858</td>
</tr>
<tr>
<td>Not Acceptable</td>
<td>196</td>
<td>269</td>
<td>628</td>
</tr>
<tr>
<td>Test by Exam</td>
<td>158</td>
<td>322</td>
<td>611</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>654</strong></td>
<td><strong>946</strong></td>
<td><strong>2,097</strong></td>
</tr>
</tbody>
</table>

Secretariat

<table>
<thead>
<tr>
<th></th>
<th>1979</th>
<th>1980</th>
<th>1981</th>
</tr>
</thead>
<tbody>
<tr>
<td>Acceptable</td>
<td>300</td>
<td>355</td>
<td>858</td>
</tr>
<tr>
<td>Not Acceptable</td>
<td>196</td>
<td>269</td>
<td>628</td>
</tr>
<tr>
<td>Test by Exam</td>
<td>158</td>
<td>322</td>
<td>611</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>654</strong></td>
<td><strong>946</strong></td>
<td><strong>2,097</strong></td>
</tr>
</tbody>
</table>

Source: Institution of Engineers, Australia.

17. Of the 624 candidates who were judged as requiring test by examination in 1981, only 25 applied to take the test and 21 actually sat for the examination. Eight of these passed. In 1980, 19 people applied to sit for the examination of whom 7 passed, 6 failed, and 6 did not attend.

18. In 1982 there were 180 applicants to sit for the examination. This was because the examination was made available overseas for the first time. The Committee commends this initiative, which saves engineers having to travel to Australia just to take a written examination. However, the Committee noted that because of the large numbers now applying to take the examination overseas, it is appropriate for it to be held twice a year, instead of once as is the case at present.

19. The Committee therefore recommends that the Institution should, in relation to its examination in professional engineering, consider making it available twice a year instead of once.

(Recommendation 81)
20. The examination questions are set by a number of educationists at the request of the Institution. These examiners operate independently of each other. Candidates must choose two topic papers from any of the engineering fields as set out in Table 3, not necessarily from the branch of engineering in which they wish to practise. Both papers must be passed in the one session. The Institution charges a fee of $80 to cover the costs of conducting the test by examination which is monitored by the Institution's Board of Examiners. The Committee noted that in most Australian engineering courses final year students are required to cover up to 6 topics.

Table 3

<table>
<thead>
<tr>
<th>PROFESSIONAL ENGINEERING EXAMINATION TOPICS</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>Civil Engineering</strong></td>
</tr>
<tr>
<td>(1) Theory of Structures</td>
</tr>
<tr>
<td>(2) Civil Engineering: Soil Mechanics</td>
</tr>
<tr>
<td>(3) Civil Engineering: Fluid Mechanics</td>
</tr>
<tr>
<td>(4) Concrete and Metals Technology</td>
</tr>
<tr>
<td><strong>Electrical Engineering</strong></td>
</tr>
<tr>
<td>(5) Fields, Circuits, Networks</td>
</tr>
<tr>
<td>(6) Properties of Electrical Materials</td>
</tr>
<tr>
<td>(7) Electronics and Communications</td>
</tr>
<tr>
<td>(8) Energy Conversion and Control</td>
</tr>
<tr>
<td><strong>Mechanical Engineering</strong></td>
</tr>
<tr>
<td>(9) Mechanics of Solids</td>
</tr>
<tr>
<td>(10) Dynamics and Theory of Mechanics</td>
</tr>
<tr>
<td>(11) Mechanical Engineering: Fluid Mechanics</td>
</tr>
<tr>
<td>(12) Mechanical Engineering: Thermodynamics</td>
</tr>
<tr>
<td><strong>Chemical Engineering</strong></td>
</tr>
<tr>
<td>(13) Chemical Engineering: Thermodynamics</td>
</tr>
<tr>
<td>(14) Reaction Engineering and Rate Processes</td>
</tr>
<tr>
<td>(15) Transport Phenomena and Stage-wise Processes</td>
</tr>
<tr>
<td><strong>Aeronautical Engineering</strong></td>
</tr>
<tr>
<td>(16) Aerodynamics</td>
</tr>
<tr>
<td>(17) Aircraft Structures</td>
</tr>
<tr>
<td>(18) Aeronautical Engineering: Thermodynamics</td>
</tr>
</tbody>
</table>
Naval Architecture

(19) Hydrostatics, Stability, Launching, Flooding, Ship Motions
(20) Ship Structures
(21) Ship Propulsion

Mining Engineering

(22) Mining Engineering: Rock and Soil Mechanics
(23) Mining Systems: Coal and Metalliferous
(24) Mining Systems: Oil and Natural Gas

Industrial/Production Engineering

(25) Manufacturing Engineering
(26) Methods Engineering
(27) Metrology and Quality Control
(28) Production Planning and Control

Source: Institution of Engineers, Australia.

21. The results for all examination sessions held to September 1981 are shown in Table 4 analysed by country of qualification. Table 4 shows the wide range of countries and the large number of institutions from which candidates originated. The average pass rate over 9 years has been 48 per cent.

Table 4

RESULTS OF ENGINEERING EXAMINATION BY INSTITUTION AND COUNTRY OF QUALIFICATION

<table>
<thead>
<tr>
<th>COUNTRY &amp; INSTITUTION</th>
<th>FIRST ATTEMPT</th>
<th>SECOND ATTEMPT</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Pass</td>
<td>Fail</td>
</tr>
<tr>
<td>EGYPT</td>
<td>19</td>
<td>16</td>
</tr>
<tr>
<td>from 8 institutions</td>
<td></td>
<td></td>
</tr>
<tr>
<td>INDIA:</td>
<td>9</td>
<td>13</td>
</tr>
<tr>
<td>from 11 institutions</td>
<td></td>
<td></td>
</tr>
<tr>
<td>TURKEY:</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>from 2 institutions</td>
<td></td>
<td></td>
</tr>
<tr>
<td>IRAN:</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>from 2 institutions</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

* one fail, one pass
** two fails
<table>
<thead>
<tr>
<th>COUNTRY &amp; INSTITUTION</th>
<th>FIRST ATTEMPT</th>
<th>SECOND ATTEMPT</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Pass</td>
<td>Fail</td>
</tr>
<tr>
<td>IRAQ: from 1 institution</td>
<td>3</td>
<td>3</td>
</tr>
<tr>
<td>THAILAND: from 2 institutions</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>CHILE: from 1 institution</td>
<td>-</td>
<td>1</td>
</tr>
<tr>
<td>PHILIPPINES: from 7 institutions</td>
<td>2</td>
<td>7</td>
</tr>
<tr>
<td>INDONESIA: from 3 institutions</td>
<td>2</td>
<td>1</td>
</tr>
<tr>
<td>CHINA: from 1 institution</td>
<td>-</td>
<td>-</td>
</tr>
<tr>
<td>PAKISTAN: from 2 institutions</td>
<td>1</td>
<td>1</td>
</tr>
<tr>
<td>JAPAN: from 1 institution</td>
<td>1</td>
<td>-</td>
</tr>
<tr>
<td>PAPUA NEW GUINEA: from 1 institution</td>
<td>-</td>
<td>1</td>
</tr>
<tr>
<td>BURMA: from 1 institution</td>
<td>-</td>
<td>1</td>
</tr>
<tr>
<td>SINGAPORE: from 1 institution</td>
<td>-</td>
<td>1</td>
</tr>
<tr>
<td>TAIWAN: from 3 institutions</td>
<td>1</td>
<td>2</td>
</tr>
<tr>
<td>VIETNAM: from 1 institution</td>
<td>2</td>
<td>-</td>
</tr>
<tr>
<td>MALAYSIA: from 1 institution</td>
<td>1</td>
<td>-</td>
</tr>
<tr>
<td>HONG KONG: from 1 institution</td>
<td>1</td>
<td>-</td>
</tr>
</tbody>
</table>

* one fail, one pass
** two fails

Source: Institution of Engineers, Australia
Discussion of Assessment Procedures

22. As already noted, there are significant differences between assessment procedures applied to professional engineers with overseas qualifications and those applied to the other professions which the Committee considered in depth. In the case of engineers, the work they perform is subject to legal control through processes of inspection rather than the individual performing the work, and it is for this reason that engineers do not personally have to be licensed. A difference in the assessment procedures for this profession is that they aim to establish that the qualification is acceptable either through an examination of documents or by a written examination, and do not test the competence of the individual as such.

23. The Institution has the power to decide whom it will admit to membership, and is the only body able to carry out assessments; its main concern is that applicants can show evidence that the course they have satisfactorily completed has sufficient professional engineering content.

24. Its judgements are relied on by most employers in Australia including the Commonwealth Government to assess the qualifications of overseas-qualified engineers. Its authority is derived from the Professional Engineers Award, 1961, which defines a 'qualified' or 'experienced' engineer as someone eligible for Graduate or Member status of the Institution.

25. Because of the rise in the number of assessments referred by the Committee on Overseas Professional Qualifications (COPQ), the Institution was given a grant by COPQ in 1982 to employ an additional person for the Institution's secretariat carrying out the assessments.

26. The assessment methods employed by the Institution for those immigrants within Australia seem to be very flexible provided the course taken is similar to an Australian course. Eligibility for membership of the Institution, while desirable, is not entirely necessary to obtain work. The assessment methods adopted for those applying from overseas are similar to those used for tradesmen in the metal and electrical trades, in that applicants are assessed against criteria set for particular courses in specific countries. The main difference is that the criteria for engineers rest upon, and may in practice be too dependent on, the knowledge and experience of those doing the assessing of the course undertaken by the applicant.

27. The Committee has noted that the assessment methods employed by the Institution are not uniformly applied to all cases. Some applicants are assessed on their qualifications by the secretariat or the FQC while others, if there is a doubt,
are subject to a test by examination. Moreover, as noted previously the choice of method appears to relate very closely to the two categories of European and non-European qualifications.

28. The Committee believes that there are problems with the present system. The major ones appear to be:

- the assessment method is not universally applied; some applicants are assessed on their documented qualifications while others are subject to an examination;
- knowledge within the Institution of course quality and academic excellence of educational bodies may quickly become outdated; and
- the assessments applied to some applicants can be seen by them as discriminatory.

29. As has been seen, the Institution is a non-government organization which carries out the assessment of overseas professional engineering qualifications largely through work done on a voluntary basis by senior staff and members of the Institution.

30. COPQ in setting its own priorities and having regard to its own limited resources has not set up an expert panel for professional engineering. In COPQ's Thirteenth Report for year ending December 1981, it is stated:

Within the first two years of its establishment the Committee also looked at a further group of professions:

- agriculture
- chemistry
- engineering
- physics
- speech therapy.

These proved to be occupations in which registration Acts did not apply and where the professional associations themselves had already developed effective procedures for evaluating overseas qualifications. In each case the committee's activity was limited to producing, with the assistance of the professional associations themselves, a series of booklets setting out the existing assessment procedures for the information of embassies or prospective migrants.

COPQ has recognised the increased number of assessments the Institution has been called on to make and has made a grant to support additional paid assistance. It will be recalled that COPQ has set up expert panels for each of the other professions examined by the Committee.
31. The Institution is but one of many autonomous non-government bodies carrying out assessments of qualifications in professional, sub-professional and technical occupations in fields not requiring regulation. Having regard to this it seems impractical in terms of staff required and cost to suggest that, in order to achieve the optimum of objectivity, a government body should take over and run the assessment processes in all professional, sub-professional and technical occupations.

32. The Committee has concluded in the case of professional engineering that the best course is for COPQ to establish an expert panel and for that panel to decide, having regard to the principles and practices recommended in this report, what changes should be made to the current procedures.

33. The Committee therefore recommends that the Minister require COPQ to establish an expert panel for professional engineering and make available the necessary finance to enable the panel to provide COPQ and the Minister a report on:

(i) whether, having regard to all the circumstances, including the fact that professional engineering is a non-Registrable profession, the present system of an assessment of documents, professional interview and test by examination should be retained with any improvements recommended;

(ii) whether, in order to achieve the optimum of objectivity some different method of assessment should be adopted; and

(iii) the cost of any change recommended and who should bear that cost.

(Recommendation 82)

OTHER ISSUES

Right of Appeal

34. A number of submissions complained that there was no right of appeal from the decisions made by the Institution with regard to assessments and recognition of overseas qualifications. The Committee's investigations confirmed that there were no formal appeal procedures although the opportunity exists for informal review.

35. The Committee recommends that a right of appeal be introduced from the decisions of the Institution of Engineers, Australia, on matters of assessment and that the form this should take be a matter for discussion and decision between the Institution and COPQ.

(Recommendation 83)
English Language

36. The Institution does not assess an applicant's knowledge of English language as a separate aspect of his or her basic qualification. It does not stipulate fluency in English as a requirement for membership. However, a minimum standard of English is required to complete the tests set on behalf of the Institution. A number of the questions demand a descriptive answer. The Institution considers that some English is necessary to practise engineering in Australia, but not at the higher level which would be required, for example, for the medical profession.

Counselling

37. The Committee has identified two major stages in the provision of counselling to overseas-qualified professional engineers:
   
   - counselling at overseas posts as an aid to decision making on whether to migrate; and
   
   - counselling those experiencing difficulties in qualifying for membership of the Institution of Engineers, Australia.

38. The Committee therefore recommends that the Institution of Engineers, Australia, produce for those involved in counselling current relevant information for the advice and counselling of overseas-qualified professional engineers in regard to assessment of their qualifications.

(Recommendation 84)

Requirement for a 4 year Course

39. The Institution is responsible for accrediting basic engineering degree courses in Australia for automatic recognition for graduate membership of the Institution. Since it decided in 1970 that only 4 year courses would be acceptable for the purposes of conferring eligibility for membership on Australian graduates, it believed it had to apply similar standards to overseas graduates.

40. The rules of the Institution as modified in 1980 state that, for anyone who graduated after June 1980, full membership will not be granted until the equivalent of a 4 year course had been completed. Graduate membership will be allowed until 31 December 1985, after which all membership lapses unless the additional qualifying study has been carried out.

41. The 1980 rule has particularly affected a number of European and British engineers, and the Committee received several submissions protesting about their non-acceptance by the Institution.

253
42. The Institution is aware that its 1980 rule may be denying automatic membership to some professional engineers who are recognised in the United Kingdom and Western Europe and is currently considering introducing a qualifying period of professional experience for those affected.

43. In the meantime the Committee considers that it would greatly assist such people if they clearly understood before coming to Australia that their qualifications are not acceptable, and that they will have to undertake further study if they wish to obtain membership of the Institution.

44. As most engineers currently enter Australia in the labour shortage category the 1980 rule will effectively prevent an increasing number from obtaining entry as immigrants. Others who enter in the special eligibility, refugee and family reunion categories, should be able to seek counselling from the Institution as to how they can upgrade their qualifications to make them acceptable to the Institution.

45. There are probably also quite a number of engineers already in Australia, working in sub-professional grades, who are unable to obtain membership of the Institution and do not qualify for employment with many important employers. The Committee received submissions from a number of these, of which the following is typical:

I am a fully qualified professional in the U.K. and enjoy equal status to corporate members of all the Chartered Engineering Institutions, which is equal in status to membership of the Institution of Engineers, Australia, in Australia.

The Institution of Engineers, Australia (I.E.A.) has rejected my application for membership, pointing out that it has never accepted qualifications in Building Services Engineering, nor do they accept professional engineering experience within the field. Commonwealth and State Governments and the Association of Consulting Engineers all demand I.E.A. acceptance from their building services designers in engineering grades. Consequently, my employment is restricted to non-professional grades in building services engineering, because of I.E.A.'s policy and blind acceptance of Governments of I.E.A. decisions without comment or control.

(The author of this submission applied to the Institution for assessment of his qualifications in July 1968 while still a resident of the United Kingdom. He was informed that his Higher Diploma, which was a 3 year sandwich course, did not satisfy the Institution's requirements).
46. There are in fact a number of part-time postgraduate engineering courses, at universities and CAE's, whose engineering degrees are recognised by the Institution, which on completion would enable applicants to qualify for membership of the Institution.

47. The Committee also recommends that the Institution of Engineers, Australia, consider introducing a qualifying period of professional experience together with additional postgraduate study for overseas qualified professional engineers who are adversely assessed because of the 1980 rule, so that they can qualify for membership of the Institution.

(Recommendation 85)

Qualifications with no Australian Equivalent

48. There are some overseas qualifications which are recognised by national authorities in the country of origin as being equivalent to professional engineering level, that have no equivalent in Australia. The Institution's approach to this difficulty is to examine the course undertaken to ascertain whether there has been sufficient 'engineering' content, as opposed to pure science. If the course contains sufficient 'engineering' content than the qualifications will be classified as acceptable.
CHAPTER 16
RECOGNITION PROCEDURES IN OTHER OCCUPATIONS

INTRODUCTION

1. The Committee drew attention in the introduction to this Report to the large number of occupations in which immigrants might encounter problems in relation to the recognition of their overseas qualifications. Having regard to this and the resources and time available the Committee limited its detailed examination of recognition procedures to those professions and trades dealt with in previous chapters.

2. The Committee did, however, advertise widely inviting submissions and 445 were received of which a number dealt with specific occupations. Some 38 professions were referred to, 23 technical and sub-professional occupations and 13 trades. These were as follows:

Professions

Academic (Tertiary Lecturer)  Natural Therapist
Accountant                  Nurse
Air Pilot                   Occupational Therapist
Architect                   Ophthalmologist
Audiologist                 Optician
Auditor                    Optometrist
Banker                     Pharmacist
Chemist                   Pharmacologist
Chiropodist                 Physiotherapist
Chiropractor               Physicist
Computer Professional      Psychiatrist
Dentist                    Psychologist
Dietitian                  Radiologist
Engineer                   Scientist
Lawyer                     Social Worker
Librarian                  Soil Conservationist
Linguist/Interpreter       Speech Pathologist
Management Consultant     Teacher
Medical Practitioner       Veterinary Surgeon

Technical and Sub-professional Occupations

Aircraft Technician         Horticulturalist
Auctioneer                  Medical Laboratory Technician
Broadcaster                 Mining Technician
Building Technician        Musician
Cartographer                Paramedic
Dental Technician/Prosthetist Photographer
Draftsman                   Photographic Technician
Estate Agent                Police Officer
                           Ship Radio Officer
Engineering Technician
Entertainer
Forester

Trades
Aircraft Tradesman
Boilermaker/Welder
Building Tradesman
Caterer
Electrical Tradesman
Engineering Tradesman
Fitter and Turner

Surveyor
Travel Agent
Valuer

Hairdresser
Miner
Metal Tradesman
Plumber, Drainer & Gasfitter
Printer
Refrigeration Mechanic

3. Many issues raised in these submissions regarding other occupations were similar to those raised in relation to occupations the Committee studied in detail. These have, therefore, been addressed by the Committee. Examples of such concerns include:

(a) the importance of adequate English;
(b) insufficient weight given to experience and practical skills by registration/licensing authorities;
(c) the lack of portability of qualifications throughout Australia;
(d) delay in obtaining assistance and decisions from assessing bodies; and
(e) non-acceptance in Australia of qualifications considered of an acceptable standard in countries with which Australia has reciprocal rights.

4. The issues raised in those occupations where more than two submissions were received have been summarised. It should be noted that these are points made by the authors of the submissions and do not reflect any evaluation by the Committee.

Accountants

(a) English is an important requirement (186, 229, 413)
(b) a list of equivalent qualifications is required to be drawn up by suitably qualified people (306)
(c) a qualification not accepted in Australia is accepted by the United Kingdom institution whose standards are accepted in Australia (170)
(d) an independent tribunal to take final decisions is required (Right of Appeal) (8)
(e) an applicant for membership of the professional body in Australia alleges that he has been asked to take a course of study identical to that included in his overseas qualifications (8)

Building tradesmen

(a) persons with relevant overseas qualifications and knowledge should be required to undertake a period of training in local requirements, coupled with a period of gaining practical experience in those requirements, before being issued with a master builder's licence (32)

(b) a [master] builder needs to have sufficient English to read and understand plans and to communicate with clients (32)

Chiropractors

(a) a good command of English is required (318)

(b) there should be an Expert Panel in Chiropractic and Osteopathy established within the Committee on Overseas Professional Qualifications (COPQ) (272)

(c) problems are caused by inaccurate classification of all natural therapy occupations as 'chiropractor' (287)

(d) "The Chiropractors Board of South Australia adopts the view that since the Act is a State Act of Parliament and administered by the Board solely for Chiropractors practising within the State, it therefore cannot consider applicants for initial registration from interstate or overseas unless they can clearly demonstrate that they already have clinics or employment within South Australia" (318)

Computer personnel

(a) Australia is likely to suffer shortages of skilled computer personnel and should encourage immigration of such people (134, 196)

(b) for recognition purposes more emphasis should be placed on practical skills than on formal educational qualifications (134, 196)

(c) Australia may accept new technology more slowly unless it can recognise the skills of those trained overseas (196)
(d) every effort should be made to ensure portability of computing skills throughout the world, particularly by standardising nomenclature (354)

(e) there should be an independent accreditation authority with direct responsibility to a central authority at national level (354)

(f) fluency in English is mandatory for top level professionals such as Systems Analysts and Managers but not so necessary at the lower levels (283)

(g) there are insufficient skilled staff at Australian academic institutions to instruct the number of students seeking admission to computing courses and insufficient graduates to meet community needs (283)

**Dietitians**

(a) fluency in English is essential as food choice is linked with language and culture (123)

(b) although provisions for the assessment of overseas dietitians are adequate, there are no mechanisms for assessing dietary aides (213)

**Lawyers**

(a) there should be uniform standards throughout Australia (94, 100, 445)

(b) systems of law are peculiar to particular countries (66)

(c) most people with overseas qualifications need to take courses in Australian Constitutional Law, Real Property and Legal Ethics (103)

**Occupational Therapists**

(a) fluency in spoken and written English is essential (202, 212, 375)

(b) cultural factors are significant, some overseas graduates found it difficult to adapt to the Australian workplace (202, 212, 375)

(c) automatic acceptance of world body criteria is not satisfactory (a screening process is in course of development) (202, 212)

(d) ethnic communities need practitioners of like culture (212)
Optometrists

(a) there is a need for a central register of acceptable overseas qualifications (152, 329)

(b) recognition of overseas qualifications should depend on quality plus supply and demand factors (152)

(c) in N.S.W. optometrists trained in non-English speaking countries are not recognised as they are considered to lack the training and expertise thought necessary to practise optometry in Australia (328)

Nurses

(a) individual abilities and training are not given proper recognition (192)

(b) opportunities are needed for overseas-qualified nurses to demonstrate skills (396)

(c) immigration regulations prevent overseas-qualified nurses from entering Australia to undergo their period of supervised practice (156, 185)

Pharmacists

(a) good English is essential to pharmacists as they must communicate with clients (200, 219, 277)

(b) pharmacy is an area of particular difficulty for the overseas-qualified - the COPQ pharmacy examination is excessively stringent (352)

(c) registration should be granted to anyone competent to practise (291)

(d) candidates for the COPQ pharmacy examination should be informed that passing the examination does not lead to automatic registration as some State boards may have additional requirements (248)

(e) there are insufficient training positions for those seeking registration (44)

Scientists

(a) it is difficult to assess qualifications from countries which do not have a comparable education system (179, 274)

(b) there are often delays in obtaining decisions from assessing bodies (105)
(c) each assessing body should maintain a more comprehensive listing of recognised qualifications (105)

(d) an effective accreditation body for applied scientific qualifications should be established (274)

(e) inability to communicate effectively in English is seen to be the major factor restricting the employment of overseas-qualified people in scientific research and technical areas (335)

**Social workers**

(a) it is not appropriate for employers to be tied to accreditation decisions taken by another body as these may hinder the employment of the most suitable person (33)

(b) there is no legislation against which social work qualifications obtained overseas can be measured (166)

(c) the professional body in Australia does not have the resources to establish national standards and carry out assessment of overseas qualifications (166)

(d) the current immigration procedures do not take adequate account of the occupational needs of dependent spouses (166)

(e) assessments of qualifications held by refugees cannot be based on documentation alone (166)

(f) current procedures for recognition of overseas qualifications are not adequate or equitable (190, 210, 301, 308)

(g) the assessment process is not open to scrutiny and there seems to be no right of appeal (190, 210, 308)

(h) a range of alternatives to the current practice of determining standards of minimum competence should be considered (193)

**Surveyors**

(a) experience and ability are not taken into account by registration boards (378)

(b) technological advances have significantly changed the discipline of surveying to the point where it should be integrated with engineering (196)
the different requirements of State registration boards cause problems for employers (135)

COPQ should establish an Expert Panel able to assess overseas qualifications in surveying (87)

Teachers

(a) qualifications have been downgraded to a level attracting less status and salary than that considered fair and reasonable (11, 24, 36, 257)

(b) basic qualifications have not been recognised in Australia even though in some cases experience or higher qualifications have been obtained in Australia (137, 183)

(c) the introduction of registration requirements in the mid 1970s has disadvantaged some teachers whose basic qualification is no longer recognised (12, 24)

(d) experience is not taken into account in the assessment procedure (10, 11, 128, 294)

(e) skills of overseas-trained teachers are not being used, for example to teach language and culture in Australian schools (183, 257, 266, 359, 444)

(f) there are inadequate facilities for conversion courses for overseas-trained teachers (183, 257, 359, 294, 444)

(g) assessment criteria are not made public which inhibits appeals against decisions (128)

(h) different State systems cause difficulties (128, 359)

Veterinary surgeons

(a) there is a need for improved counselling overseas (360)

(b) it is extremely difficult for those not allowed to take the examination to requalify: they are forced to take an entire course of study again (161)

5. The Committee is aware that COPQ is already doing some work in relation to a number of these occupations, for example accountancy, architecture, dietetics, teaching, veterinary science, generalist qualifications, nursing, social welfare, pharmacy, podiatry. See COPQ's Thirteenth Report, December 1981 for details.
6. No doubt other authorities and government departments have given some attention to some of the issues raised, for example the Commonwealth Department of Education in its submission (398) drew the Committee's attention to the National Inquiry into Teacher Education which reported to the Commonwealth Minister for Education in 1980. This report made firm recommendations for both courses and financial assistance which would enable overseas-trained teachers to resume their careers as professional teachers in Australia.

CONCLUSIONS

7. The Committee is of the view that the issues raised in submissions received in relation to these other occupations should all be properly examined and reported on together with the work already done by COPQ and any other authorities. The report should direct attention to any inadequacies or inequities in current procedures and practices relating to recognition.

8. Having in mind that this Committee of Inquiry would be unable to examine recognition procedures in an extensive number of occupations but that the need for this to be done had been demonstrated, the Committee, in Chapter 10, recommended:

(a) that COPQ should be a permanent part of Commonwealth Government machinery; and

(b) that COPQ's terms of reference be expanded to include the power to review the procedures for the assessment and recognition of overseas qualifications and where such procedures are found to be inadequate or inequitable to decide upon the action necessary to rectify the position, and

. take such action where empowered so to do, or

. recommend such action to the Commonwealth and/or relevant State Minister.

9. The Committee believes it to be appropriate for the Minister for Immigration and Ethnic Affairs to decide, on the advice of COPQ, and in consultation with State Ministers, the order of priority in which the review should be undertaken and the funds to be made available for the task.

10. The Committee has also concluded that the issues raised in submissions in relation to trades not dealt with by the Committee should be referred to the appropriate trade committee for examination and report.
RECOMMENDATION

11. It is therefore recommended that in relation to occupations not dealt with by this Inquiry the issues raised by submissions be referred, as appropriate, to COPQ or the relevant trade committee for examination and report to the Minister concerned, and the matter kept under review by the Commonwealth/State Ministers for Immigration and Ethnic Affairs.

(Recommendation 86)
LIST OF SUBMISSIONS

The Committee wishes to acknowledge the assistance provided to it in the submissions from the following persons and organisations. The list shows the main topic addressed by the submission.

1. Fey, G.H., Willetton, W.A. - 26.1.82 - hairdressing
3. Grahn, H., Scotts Point, Qld - 2.2.82 - medicine and nursing
4. Liuby, P.K., North Adelaide, S.A. - 9.2.82 - marine engineering
5. Stone, D., Kambah, A.C.T. - 2.2.82 - general comments
6. Schaefer, F., Innaloo, W.A. - 3.2.82 - engineering
7. Gibson, R., Normanhurst, N.S.W. - 5.2.82 - engineering
8. Singh, C.P., West Brunswick, Vic. - 5.2.82 - accountancy
9. Spendlove, N.G., Minyama Waters, Qld - 7.2.82 - engineering
10. O'Connachtain, P., Coorparoo, Qld - 7.2.82 - teaching, manual arts
11. Yardemian, A., Lane Cove, N.S.W. - 8.2.82 - teaching, physical education
12. Noronha, L, Warrnambool, Vic. - 9.2.82 - teaching, generalist
13. Moraitis, S., St Kilda, Vic. - 10.2.82 - psychiatrists
14. Ross, R., Maribyrnong, Vic. - 10.2.82 - welding
15. Baston, A., Mosman, N.S.W. - 10.2.82 - engineering
16. Jaremkiewicz, J., Leightonfield North, N.S.W. - 10.2.82 - medicine
17. Australian Licensed Aircraft Engineers Association, Kogarah, N.S.W. - 11.2.82 - aircraft trades/technicians/licensed aircraft maintenance engineer
<table>
<thead>
<tr>
<th>No.</th>
<th>Name 1</th>
<th>Name 2</th>
<th>Location</th>
<th>Date</th>
<th>Title</th>
</tr>
</thead>
<tbody>
<tr>
<td>18</td>
<td>Macapagal-Domingo, L.F.</td>
<td>Yarraville, Vic.</td>
<td></td>
<td>11.2.82</td>
<td>medicine</td>
</tr>
<tr>
<td>19</td>
<td>Faa, L.H., Hackett, A.C.T.</td>
<td></td>
<td></td>
<td>11.2.82</td>
<td>Committee on Overseas Professional Qualifications</td>
</tr>
<tr>
<td>20</td>
<td>Donnelly, M.B., Melville, W.A.</td>
<td></td>
<td></td>
<td>18.2.82</td>
<td>medical laboratory technician</td>
</tr>
<tr>
<td>21</td>
<td>Fraillon, J.M.G., North Balwyn, Vic.</td>
<td></td>
<td></td>
<td>15.2.82</td>
<td>medicine</td>
</tr>
<tr>
<td>22</td>
<td>Dental Mechanics Registration Board, Launceston, Tas.</td>
<td></td>
<td></td>
<td>16.2.82</td>
<td>dental mechanics</td>
</tr>
<tr>
<td>23</td>
<td>Boyer, A.J., St Lucia, Qld</td>
<td></td>
<td></td>
<td>17.2.82</td>
<td>ambulance paramedic</td>
</tr>
<tr>
<td>24</td>
<td>Darman, M., Warracknabeal, Vic.</td>
<td></td>
<td></td>
<td>17.2.82</td>
<td>teaching primary</td>
</tr>
<tr>
<td>25</td>
<td>Australian Dental Association, North Sydney, N.S.W.</td>
<td></td>
<td></td>
<td>17.2.82</td>
<td>dentistry</td>
</tr>
<tr>
<td>26</td>
<td>AMAX Australia Ltd, Sydney N.S.W.</td>
<td></td>
<td></td>
<td>18.2.82</td>
<td>professional and technician staff</td>
</tr>
<tr>
<td>27</td>
<td>Jonasson, B.&amp; D., Ascot, Qld</td>
<td></td>
<td></td>
<td>19.2.82</td>
<td>mechanical engineering</td>
</tr>
<tr>
<td>28</td>
<td>Thai, H., South Yarra, Vic.</td>
<td></td>
<td></td>
<td>21.2.82</td>
<td>medicine</td>
</tr>
<tr>
<td>29</td>
<td>Bagin, B.K., Maribyrnong, Vic.</td>
<td></td>
<td></td>
<td>22.2.82</td>
<td>engineering</td>
</tr>
<tr>
<td>30</td>
<td>Tasmanian Audit Department, Hobart, Tas.</td>
<td></td>
<td></td>
<td>22.2.82</td>
<td>accountancy/auditing</td>
</tr>
<tr>
<td>31</td>
<td>Suhinin, A., Gepps Cross, S.A.</td>
<td></td>
<td></td>
<td>23.2.82</td>
<td>medicine</td>
</tr>
<tr>
<td>32</td>
<td>Master Builders Association of S.A., Adelaide, S.A.</td>
<td></td>
<td></td>
<td>23.2.82</td>
<td>builders (licensing)</td>
</tr>
<tr>
<td>33</td>
<td>Tasmanian Social Welfare Department, Hobart, Tas.</td>
<td></td>
<td></td>
<td>23.2.82</td>
<td>social workers</td>
</tr>
<tr>
<td>34</td>
<td>Neunheuser, W., Manning, W.A.</td>
<td></td>
<td></td>
<td>24.2.82</td>
<td>engineering, civil and structural</td>
</tr>
<tr>
<td>35</td>
<td>Youssef, M.S., Tullamarine, Vic.</td>
<td></td>
<td></td>
<td>1.3.82</td>
<td>dentistry</td>
</tr>
<tr>
<td>36</td>
<td>Fay, M., Springvale South, Vic.</td>
<td></td>
<td></td>
<td>25.2.82</td>
<td>teaching, secretarial studies</td>
</tr>
<tr>
<td>37</td>
<td>Australian Institute of Engineering Associates, North Sydney, N.S.W.</td>
<td></td>
<td></td>
<td>26.2.82</td>
<td>para-professional engineering</td>
</tr>
</tbody>
</table>
38. 2AAA-FM Radio Station Wagga, Wagga Wagga, N.S.W. - 26.2.82 - broadcasters
39. N.S.W. Department of Sport and Recreation, North Sydney, N.S.W. - 26.2.82 - para-medical and related services
40. Victorian College of Pharmacy, Parkville, Vic. - 26.2.82 - pharmacists
41. Dalgety Australia Ltd, Sydney, N.S.W. - 1.3.82 - agents auctioneers, engineers, accountants
42. Smiglew ska, K., St Kilda, Vic. - 1.3.82 - dentistry
43. Bevis, L.E., Mackay, Qld - 1.3.82 - general comments
44. Brach, A., Thornbury, Vic. - 1.3.82 - pharmacy
45. Brisbane College of Advanced Education, Mount Gravatt, Qld - 25.2.82 - English ability
46. Catering Institute of Australia, Brisbane, Qld - 2.3.82 - hospitality industry
47. Electrical Workers and Contractors Board, Brisbane Qld - 2.3.82 - electrical trades
48. New South Wales Film Corporation, Sydney, N.S.W. - 2.3.82 - entertainment industry
49. Musicians' Union of Australia, Windsor, Vic. - 3.3.82 - musicians
50. Blue Circle Southern Cement Ltd., North Sydney, N.S.W. - 3.3.82 - mining technicians
51. Mueller, M., Albury, N.S.W. - 3.3.82 - general comments
52. Coppens, G., Corinda, Qld - 3.3.82 - photographic technician
53. Lansky, P., Double Bay, N.S.W. - 3.3.82 - general comments
54. Fernandez, G., Hurstville, N.S.W. - 4.3.82 - ship radio officer
55. The Association of Professional Engineers, Melbourne, Vic. - 4.3.82 - engineering
56. Builders Registration Board of Queensland, Toowong, Qld - 4.3.82 - builders (licensing)
57. Phillip Institute of Technology, Bundoora, Vic. - 4.3.82 - chiropractic
New South Wales Institute of Dietitians, Camperdown, N.S.W. - 5.3.82 - dietitians

Mathews, V.K., Darwin, N.T. - 5.3.82 - general comments

Whitehead, W.J., Belmont, Vic. - 7.3.82 - welding

Australian Surveying Association Inc., Civic, A.C.T. - 7.3.82 - surveying

Rajogopalan, K., Birmingham Gardens, N.S.W. - 8.3.82 - medicine

Milne, F., Canberra, A.C.T. - 8.3.82 - general comments

Education Department, Hobart, Tas. - 8.3.82 - teaching

Nurses Board of Western Australia, Perth, W.A. - 8.3.82 - nursing

Australian Government Lawyers Association, Canberra, A.C.T. - 9.3.82 - legal profession

Ballarat College of Advanced Education, Mount Helen, Vic. - 10.3.82 - teaching, tertiary

Institution of Refrigeration and Air Conditioning Services Engineers of Western Australia Inc., Perth, W.A. - 10.3.82 - refrigeration and air conditioning trades

Moscatelli, M., St Mary's, N.S.W. - 4.3.82 - fitter and motor mechanic

Public Service Board of South Australia, Adelaide, S.A. - 10.3.82 - general comments

Engineering and Water Supply Department, Adelaide, S.A. - 10.3.82 - plumbing, gasfitting and draining

Architects Registration Board of Victoria, Melbourne, Vic. - 11.3.82 - architecture

Dunbar, D.F., Newmarket, Qld - 11.3.82 - commercial air pilot

Suhinin, N., Gepps Cross, S.A. - 23.2.82 - medicine

Tadros, G., Marrickville, N.S.W. - 11.3.82 - medicine

Armanios, M., Marrickville, N.S.W. - 11.3.82 - dentistry

"Shalom" The Association of Jewish Refugees from the USSR, Elsternwick, Vic. - 12.3.82 - medicine

Pelling, A.J., Kalgoorlie, W.A. - 12.3.82 - fitting
<table>
<thead>
<tr>
<th>No.</th>
<th>Organization</th>
<th>Location</th>
<th>Date</th>
<th>Field</th>
</tr>
</thead>
<tbody>
<tr>
<td>79</td>
<td>Northern Territory Police Headquarters, Darwin, N.T.</td>
<td></td>
<td>12.3.82</td>
<td>police force personnel</td>
</tr>
<tr>
<td>80</td>
<td>Lopez, M.T., Mill Park, Vic.</td>
<td></td>
<td>12.3.82</td>
<td>medicine</td>
</tr>
<tr>
<td>81</td>
<td>David, P., Tennyson, Qld</td>
<td></td>
<td>14.3.82</td>
<td>engineering</td>
</tr>
<tr>
<td>82</td>
<td>Department of Fisheries and Wildlife, Perth, W.A.</td>
<td></td>
<td>15.3.82</td>
<td>generalists, technicians</td>
</tr>
<tr>
<td>83</td>
<td>Professional Photographers Association of Western Australia, Perth, W.A.</td>
<td></td>
<td>15.3.82</td>
<td>photography</td>
</tr>
<tr>
<td>84</td>
<td>Northern Territory Plumbers and Drainers Licensing Board, Darwin, N.T.</td>
<td></td>
<td>15.3.82</td>
<td>plumbing, draining and gasfitting</td>
</tr>
<tr>
<td>85</td>
<td>Zeid, N.A., St Kilda, Vic.</td>
<td></td>
<td>15.3.82</td>
<td>medicine</td>
</tr>
<tr>
<td>86</td>
<td>Medical Board of Western Australia, West Perth, W.A.</td>
<td></td>
<td>16.3.82</td>
<td>medicine</td>
</tr>
<tr>
<td>87</td>
<td>Institution of Surveyors - Australia, Sydney, N.S.W.</td>
<td></td>
<td>16.3.82</td>
<td>surveying</td>
</tr>
<tr>
<td>88</td>
<td>Attorney General's Department, Hobart, Tas.</td>
<td></td>
<td>16.3.82</td>
<td>general comments</td>
</tr>
<tr>
<td>89</td>
<td>Ramsey, J., Waverley, N.S.W.</td>
<td></td>
<td>17.3.82</td>
<td>medicine</td>
</tr>
<tr>
<td>90</td>
<td>Niewiadomski, T., Queanbeyan, N.S.W.</td>
<td></td>
<td>17.3.82</td>
<td>medicine</td>
</tr>
<tr>
<td>91</td>
<td>Electricity Trust of South Australia, Mile End, S.A.</td>
<td></td>
<td>17.3.82</td>
<td>electrical trades</td>
</tr>
<tr>
<td>92</td>
<td>Polish Australian Cultural Society, Glebe, N.S.W.</td>
<td></td>
<td>17.3.82</td>
<td>drafting</td>
</tr>
<tr>
<td>93</td>
<td>Dental Board of New South Wales, Sydney, N.S.W.</td>
<td></td>
<td>17.3.82</td>
<td>dentistry</td>
</tr>
<tr>
<td>94</td>
<td>The Western Australia Bar Association, Perth, W.A.</td>
<td></td>
<td>18.3.82</td>
<td>legal profession</td>
</tr>
<tr>
<td>95</td>
<td>Kench, P., Dubbo, N.S.W.</td>
<td></td>
<td>19.3.82</td>
<td>medicine</td>
</tr>
<tr>
<td>96</td>
<td>Palmer, R., Tully, Qld</td>
<td></td>
<td>11.3.82</td>
<td>electrical trades</td>
</tr>
<tr>
<td>97</td>
<td>Jayasinghe, L.S., Chapel Hill, Qld</td>
<td></td>
<td>15.3.82</td>
<td>medicine</td>
</tr>
<tr>
<td>98</td>
<td>Dental Board of the Northern Territory, Darwin, N.T.</td>
<td></td>
<td>15.3.82</td>
<td>dentistry and dental trades</td>
</tr>
<tr>
<td>99</td>
<td>Royal Australasian College of Dental Surgeons, Sydney, N.S.W.</td>
<td></td>
<td>16.3.82</td>
<td>dentistry</td>
</tr>
</tbody>
</table>

269
100. Commonwealth Legal Aid Council, Canberra, A.C.T. - 17.3.82 - legal profession

101. Commercial Banking Company of Sydney Ltd, Sydney, N.S.W. - 17.3.82 - banking and computer personnel

102. Physiotherapists Registration Board of Victoria, Melbourne, Vic. - 18.3.82 - physiotherapy

103. New South Wales Bar Association, Sydney, N.S.W. - 29.3.82 - legal profession

104. Royal Australian Institute of Architects, Manuka, A.C.T. - 19.3.82 - architecture

105. Department of Agriculture Victoria, Melbourne, Vic. - 19.3.82 - general comments

106. Humes Ltd, Melbourne, Vic. - 22.3.82 - accountancy

107. Australian Association of Clinical Bio-chemists, Perth, W.A. - 18.3.82 - bio-chemists

108. Department of Labour and Industry, Hobart, Tas. - 19.3.82 - plumbing, gasfitting and hairdressing

109. Parnell, E., Chermside, Qld - 12.2.82 - accountancy

110. Optical Dispensers Licensing Board, Sydney, N.S.W. - 19.3.82 - optical dispensing

111. Hawker Pacific Pty Ltd, Yagoona, N.S.W._- 19.3.82 - aircraft trades

112. Senadipathy, D.N.R., Alice Springs, N.S.W. - 20.3.82 - psychiatry

113. Pharmacy Board of Victoria, Parkville, Vic. - 22.3.82 - pharmacists

114. Australian Broadcasting Commission, Sydney, N.S.W. - 22.3.82 - technicians

115. New South Wales Institute of Psychiatry, Rozelle, N.S.W. - 22.3.82 - psychiatry

116. Ethnic Communities Council of Tasmania, Hobart, Tas. - 22.3.82 - general comments

117. Seshadri R. and Orell S., Bedford Park, S.A. - 19.3.82 - medicine

118. Transfield Pty Ltd, Sydney, N.S.W. - 23.3.82 - metal trades, and professional and technical staff
119. Kimberly-Clark Australia, Milsons point, N.S.W. - 15.3.82 - general comments
120. Gale, A.E., North Adelaide, S.A. - 23.3.82 - general comments
121. Naqvi, I.H., Howrah, Tas. - 23.3.82 - general comments
122. Cadbury Schweppes Australia Ltd, Melbourne, Vic. - 22.3.82 - general comments
123. Australian Association of Dietitians, Civic, A.C.T. - 24.3.82 - dietitians
124. Royal Australasian College of Radiologists, Melbourne, Vic. - 23.3.82 - radiology
125. Printing and Kindred Industries Union, Sydney, N.S.W. - 25.3.82 - printing trades
126. W.D. Scott & Co. Pty Ltd, Sydney, N.S.W. - 24.3.82 - management consultancy
127. Geelong Ethnic Communities Council, Geelong West, Vic. - 22.3.82 - general comments
128. Beattie, W., Alexandria, N.S.W. - 24.3.82 - teaching
129. Mostafa, O., Noble Park, Vic. - 22.3.82 - dentistry
130. Thomson, G., Leeming, W.A. - 22.3.82 - medical laboratory technician
131. Australian Institute of Nuclear Science and Engineering, Lucas Heights, N.S.W. - 25.3.82 - engineering and technical
132. State Electricity Commission of Victoria, Melbourne, Vic. - 23.3.82 - electrical trades
133. Faculty of Anaesthetists, Melbourne, Vic. - 1.3.82 - medicine
134. IBM Australia Ltd, Sydney, N.S.W. - 22.3.82 - computer science
135. Jones Lang Wootton, Sydney, N.S.W. - 23.3.82 - general comments
136. Co. As. It., Wollongong, N.S.W. - 24.3.82 - general comments
137. Leigh, J., Coledale, N.S.W. - 22.3.82 - teaching, and medicine
138. B.J. Mackinnon, M.L.A., Member for Murdoch, W.A. - 22.3.82 - general comments
139. Wijeyesekera, J.G., Broadmeadows, Vic. - 25.3.82 - medicine
140. Maes, L.J., Potts Point, N.S.W. - 24.3.82 - air pilot
141. Chanla, M., Flemington, Vic. - 25.3.82 - dentistry
142. Chiropodists Registration Board, Sydney, N.S.W. - 17.3.82 - chiropody
143. Australian Institute of Geoscientists, Sydney, N.S.W. - 24.3.82 - geoscientist
144. Nantharath, S., East Melbourne, Vic. - 24.3.82 - dentistry
145. Komser, M., Prahran, Vic. - 23.3.82 - dentistry
146. Pytel, W., Bentleigh, Vic. - 25.3.82 - dentistry
147. Gizinska, A., Chirnside Park, Vic. - 25.3.82 - dentistry
148. Anonymous - 25.3.82 - psychiatry
149. Department of Crown Lands and Survey, Melbourne, Vic. - 25.3.82 - general comments
150. Officer R.R, Monash University, Clayton, Vic. - 23.3.82 - general comments
151. Anonymous - 29.3.82 - general comments
152. Optometrist Board of Queensland, Brisbane, Qld - 22.3.82 - optometry
153. Haibritter, H., Dutton Park, Qld - 26.3.82 - engineering
154. The Federated Miscellaneous Workers Union of Australia, Sydney, N.S.W. - 26.3.82 - general comments
155. Wills, P. & I., Killara, N.S.W. - 26.3.82 - engineering
156. P. Ruddock, Member for Dundas, N.S.W. - 23.3.82 - various individual cases
157. Australian Islamic Mission, Lakemba, N.S.W. - 30.3.82 - general comments
158. The Greek Professionals Association, Melbourne, Vic. - 25.3.82 - general comments
159. Darwin Community College, Casuarina, N.T. - 25.3.82 - general comments
160. The Chartered Institution of Building Services (CIBS), London, BRITAIN - 26.3.82 - engineering

161. The New Settlers' Baptist Association of Australia, Ringwood, Vic. - 24.3.82 - veterinary surgeon

162. Doukas, L., Camberwell, Vic. - 19.3.82 - dentistry

163. Pey-Yung Ja, Springvale, Vic. - 26.3.82 - dentistry

164. Chandra, P.K., Newtown, N.S.W. - 29.3.82 - dentist

165. Lao Community Advancement Co-operative, Cabramatta, N.S.W. - 24.3.82 - general comments

166. The Australian Association of Social Workers (AASW), Canberra, A.C.T. - 29.3.82 - social workers

167. Sztejnberg, L., St Kilda, Vic. - 26.3.82 - dentistry

168. Banga, G.C., Matraville, N.S.W. - 26.3.82 - engineering

169. Trans Australia Airlines (TAA), Melbourne, Vic. - 24.3.82 - engineering

170. Wilson, R.K., Blackburn, Vic. - 24.3.82 - accountancy

171. Latvian Club of South Australia, Wayville, S.A. - 12.3.82 - general comments

172. Police Department Headquarters, Sydney, N.S.W. - 18.3.82 - police

173. Australian Association of Speech and Hearing, Spring Hill, Qld - 26.3.82 - speech pathologist

174. Indian Australian Association of South Australia, North Adelaide, S.A. - 31.3.82 - representation on behalf of D. Agarwal - medicine

175. Australian Conference of Principals of Colleges of Advanced Education, Braddon, A.C.T. - 31.3.82 - general comments

176. Institution of Engineers, Australia, Barton, A.C.T. - 30.3.82 - engineering

177. The Royal Australian Chemical Institute, Parkville, Vic. - 29.3.82 - chemist

178. Jagdev, B.S., Matraville, N.S.W. - 29.3.82 - general comments

179. Australian Society of Soil Science Incorporated, Glen Osmond, S.A. - 29.3.82 - soil science
Qantas Airways, Ltd, Sydney, N.S.W. - 29.3.82 - general comments

Ireland, J.P., Sydney, N.S.W. - 29.3.82 - engineering

R.W. Miller & Co. Pty, Ltd, Newcastle, N.S.W. - 29.3.82 - mining personnel

Australian Federation of Business & Professional Women, Traralgon, Vic. - 31.3.82 - general comments

National Specialist Qualification Advisory Committee, Woden, A.C.T. - 29.3.82 - medicine

Royal Australian Nursing Federation, South Melbourne, Vic. - 25.3.82 - nursing

Australian Society of Accountants, Melbourne, Vic. - 15.3.82 - accountancy

Lebanese Students' Association, Kensington, N.S.W. - 26.3.82 - general comments

The Guild of Dispensing Opticians (Australia) Ltd & the Association of Spectacle Makers Ltd, Chatswood, N.S.W. - 26.3.82 - opticians

Amalgamated Metal Workers' and Shipwrights' Union (AMWSU), Surry Hills, N.S.W. - 29.3.82 - general comments

Didcott, A, Queanbeyan, N.S.W. - 30.3.82 - social work

The Electrical Contractors Association of Australia, Myrtle Bank, S.A. - 29.3.82 - electrical trades

Kaye, R., Brisbane, Qld - 30.3.82 - nursing

Standing Committee of Heads of Schools of Social Work in Australia, Clayton, Vic. - 29.3.82 - social work

Electrical Workers' Board State Energy Commission, Perth, W.A. - 29.3.82 - electrical trades

The Australian Institute of Cartographers, Perth, W.A. - 30.3.82 - cartography

The Association for Computer Aided Design Ltd, (ACADS), Melbourne, Vic. - 30.3.82 - computer science, engineering, surveying

The Chamber of Mines of Western Australia (Incorporated), Perth, W.A. - 1.4.82 - general comments

Kelly, F.N., Ferndale, W.A. - 29.3.82 - engineering technician

274
<table>
<thead>
<tr>
<th>No.</th>
<th>Organisation</th>
<th>City/Region</th>
<th>Date</th>
<th>Field</th>
</tr>
</thead>
<tbody>
<tr>
<td>199.</td>
<td>The Institution of Chemical Engineers Australian National Committee, Osborne, S.A.</td>
<td>26.3.82</td>
<td></td>
<td>chemical engineering</td>
</tr>
<tr>
<td>200.</td>
<td>The Pharmacy Guild of Australia, Deakin, A.C.T.</td>
<td>31.3.82</td>
<td></td>
<td>pharmacists</td>
</tr>
<tr>
<td>201.</td>
<td>The Institution of Radio and Electronics Engineers Australia, Sydney, N.S.W.</td>
<td>31.3.82</td>
<td></td>
<td>electrical/electronic engineering, technician</td>
</tr>
<tr>
<td>202.</td>
<td>New South Wales Association of Occupational Therapists, Camperdown, N.S.W.</td>
<td>28.3.82</td>
<td></td>
<td>occupational therapist</td>
</tr>
<tr>
<td>203.</td>
<td>Canberra College of Advanced Education, Belconnen, A.C.T.</td>
<td>30.3.82</td>
<td></td>
<td>general comments</td>
</tr>
<tr>
<td>204.</td>
<td>Royal Australasian College of Surgeons, Melbourne, Vic.</td>
<td>30.3.82</td>
<td></td>
<td>medicine</td>
</tr>
<tr>
<td>205.</td>
<td>Metal Trades Industry Association of Australia, Sydney, N.S.W.</td>
<td>29.3.82</td>
<td></td>
<td>metal industry occupations</td>
</tr>
<tr>
<td>206.</td>
<td>State Energy Commission, Perth, W.A.</td>
<td>30.3.82</td>
<td></td>
<td>energy industry</td>
</tr>
<tr>
<td>207.</td>
<td>Nikolouzos, J., Elwood, Vic.</td>
<td>30.3.82</td>
<td></td>
<td>medicine</td>
</tr>
<tr>
<td>208.</td>
<td>Ethnic Communities' Council of N.S.W., Sydney, N.S.W.</td>
<td>1.4.82</td>
<td></td>
<td>general comments</td>
</tr>
<tr>
<td>209.</td>
<td>Morris, P., Randwick, N.S.W.</td>
<td>31.3.82</td>
<td></td>
<td>general comments</td>
</tr>
<tr>
<td>210.</td>
<td>Jarvis, S., Pontefract, W. Yorks</td>
<td>25.3.82</td>
<td></td>
<td>social work</td>
</tr>
<tr>
<td>211.</td>
<td>National Committee on Discrimination in Employment &amp; Occupation, Canberra City, A.C.T.</td>
<td>31.3.82</td>
<td></td>
<td>general comments</td>
</tr>
<tr>
<td>212.</td>
<td>Victorian Association of Occupational Therapists, South Oakleigh, Vic.</td>
<td>19.4.82</td>
<td></td>
<td>occupational therapy</td>
</tr>
<tr>
<td>213.</td>
<td>Dietitians Registration Board of Victoria, Melbourne, Vic.</td>
<td>29.3.82</td>
<td></td>
<td>dietitian</td>
</tr>
<tr>
<td>214.</td>
<td>Medical Board of Victoria, Melbourne, Vic.</td>
<td>30.3.82</td>
<td></td>
<td>medicine</td>
</tr>
<tr>
<td>215.</td>
<td>The Australian Veterinary Association Ltd, Artarmon, N.S.W.</td>
<td>31.3.82</td>
<td></td>
<td>veterinarian</td>
</tr>
<tr>
<td>216.</td>
<td>The Australasian Council on Chiropractic Education, Ltd., Mornington, Vic.</td>
<td>29.3.82</td>
<td></td>
<td>chiropractor</td>
</tr>
<tr>
<td>217.</td>
<td>Shahien, M., Essendon, Vic.</td>
<td>2.4.82</td>
<td></td>
<td>dentistry</td>
</tr>
</tbody>
</table>
218. Commonwealth Banking Corporation, Sydney, N.S.W. - 30.3.82 - general comments

219. Pharmacy Board of New South Wales, Sydney, N.S.W. - 31.3.82 - pharmacist

220. Kuring-gai College of Advanced Education, Lindfield, N.S.W. - 25.3.82 - general comments

221. Agricultural Technologists of Australia, Bathurst, nsw - 2.4.82 - agricultural science

222. Library Association of Australia, Surry Hills, N.S.W. - 1.4.82 - Librarian

223. Northern Territory Department of Education and the Northern Territory Teaching Service, Darwin, N.T. - 31.3.82 - general comments

224. Australian Greek Welfare Society, Melbourne, Vic. - 30.3.82 - general comments

225. Australian Dental Association, Brisbane, Qld - 2.4.82 - dentistry

226. Primary Teachers Registration Board, Melbourne, Vic. - 30.3.82 - teaching

227. Turkish Welfare Workers Group, Sydney, N.S.W. - 5.4.82 - general comments

228. Parnis, R., Inverell, N.S.W. - 27.4.82 - medicine

229. Institute of Affiliate Accountants, Melbourne, Vic. - 31.3.82 - accountancy

230. Johns Perry Ltd, Melbourne, Vic. - 30.3.82 - metal trades and electrical trades

231. Australian Chinese Community Association of New South Wales, Sydney, N.S.W. - 30.3.82 - general comments

232. Filipino Community, Welfare Services, Wantirna, Vic. - 30.3.82 - general comments

233. Bell, G., Alva, Qld - 30.3.82 - linguist

234. Pape, T., Ocean Grove, Vic. - 29.3.82 - plumbing

235. Vannitamby, M., Adelaide, S.A. - 2.4.82 - medicine

236. The Association of Teachers of English to speakers of other Languages (ATESOL), Woden, A.C.T. - 30.3.82 - general comments
237. Kirby, K.J., Broadway, N.S.W. - 31.3.82 - general comments
238. The College of Preceptors, London, UK - 8.2.82 - teaching
239. The Royal Australian College of Medical Administrators, Carlton, Vic. - 31.3.82 - medicine
240. Comitato Consolare, South Perth, W.A. - 15.4.82 - trades
    general, electrical trades
241. Phua, Seng-Min, Broadway, N.S.W. - 31.3.82 - general
    comments
242. Corlis D, McKinnon A, Leahy M, Modbury Hospital, Modbury,
    S.A. - 2.4.82 - medicine
243. C.S.I.R.O., Canberra, A.C.T. - 2.4.82 - general comments
244. Cook, D.J., Adelaide, S.A. - 31.3.82 - medicine
245. Hawkesbury Agricultural College, Richmond, N.S.W. -
    1.4.82 - general comments
246. Containers Ltd, Melbourne, Vic. - 31.3.82 - general
    comments
247. Institute of Family Studies, Melbourne, Vic. - 2.4.82 -
    general comments
248. Pharmaceutical Society of Australia, Canberra City,
    A.C.T. - 1.4.82 - pharmacy
249. Bandyopadhyay, S., Avondale Heights, Vic. - 7.4.82 -
    general comments
250. Australasian Society of Engineers, Sydney, N.S.W. -
    5.4.82 - engineering trades
251. Australia India Society of Victoria, Coburg, Vic. -
    30.3.82 - general comments
252. Department of Mines, Perth, W.A. - 11.3.82 - mining
    industry
253. The Royal Australian College of Ophthalmologists, Sydney,
    N.S.W. - 31.3.82 - medicine, ophthalmology
254. J. Bradfield, Member for Barton, N.S.W. - 5.2.82 -
    dentistry
255. The Hon. A.J., Grassby, The Commissioner for Community
    Relations, Canberra, A.C.T. - 6.4.82 - general comments
256. Australian Vice-Chancellors' Committee, Braddon, A.C.T. -
    6.5.82 - general comments
257. Overseas Teachers' Association, Stanmore, N.S.W. - 29.3.82 - teaching
258. I.C.I. Australia, Ltd, Melbourne, Vic. - 7.4.82 - general comments
259. M.I.M. Holdings Ltd, Brisbane, Qld - 31.3.82 - 31.3.82 - general comments
260. Australian Institute of Physics, Sydney, N.S.W. - 5.4.82 - physicists
261. Australian Embassy Philippines, Metro Manila, Philippines - 23.4.82 - COPQ
262. The South Australian Institute of Technology, Adelaide, S.A. - 2.4.82 - general comments
263. L.P. Fricker, Burnside, S.A. - 2.4.82 - marine engineering
264. Ansett Transport Industries, Ltd., Melbourne, Vic. - 7.4.82 - general comments
265. The Australian Welding Institute, Milsons Point, N.S.W. - 15.4.82 - welding
266. Co. As. It. School Committee, Surry Hills, N.S.W. - 6.4.82 - teaching
267. Public Service Board of Victoria, Melbourne, Vic. - 8.4.82 - general comments
268. Department of Home Affairs and Environment, Canberra City, A.C.T. - 1.4.82 - general comments
269. The Hydro-Electric Commission, Hobart, Tas. - 8.4.82 - general comments
270. The Turkish Welfare Association, Marrickville, N.S.W. - 5.4.82 - general comments
271. Griffith University, Brisbane, Qld - 7.4.82 - general comments
272. Chiropractors and Osteopaths Registration Board of Victoria, Melbourne, Vic. - 7.4.82 - chiropractic / osteopathy
273. Confederation of Australia Industry (CAI), Melbourne, Vic. - 8.4.82 - general comments
274. Department of Housing and Construction, Dickson, A.C.T. - 13.4.82 - general comments

278
275. The Australian Institute of Refrigeration, Air Conditioning and Heating Inc., Parkville, Vic. - 8.4.82 - air conditioning heating and refrigeration industry

276. The Audiological Society of Australia, Sydney, N.S.W. - 29.4.82 - audiology

277. The Pharmaceutical Council of Western Australia, Perth, W.A. - 23.4.82 - pharmacy

278. The Pipeline Authority, Canberra City, A.C.T. - 13.4.82 - general comments

279. The University of Western Australia, Nedlands, W.A. - 8.4.82 - general comments

280. Department of Housing and Construction, Phillip, A.C.T. - 14.4.82 - plumbing

281. Australian Medical Association, Glebe, N.S.W. - 7.4.82 - medicine

282. Albury-Wodonga Development Corp., Wodonga, Vic. - 14.4.82 - general comments

283. Australian Computer Society Incorporated, Ingle Farm, S.A. - 7.4.82 - computer science

284. Ministry of Transport, Melbourne, Vic. - 7.4.82 - general comments

285. Queensland Association of Teachers of English as a Second Language, Brisbane, Qld - 28.3.82 - general comments

286. The Institute of Draftsmen, Australia, Toowoomba, Qld - 6.4.82 - drafting

287. Australian Natural Therapists Association, St Leonards, N.S.W. - 5.4.82 - general comments

288. Anonymous - general comments

289. Indo-China Refugee Association (Australia), Sydney, N.S.W. - 14.4.82 - refugees

290. Cleary, M.J., Canberra, A.C.T. - 19.4.82 - general comments

291. The Australian Society of Clinical and Experimental Pharmacologists, Bedford Park, S.A. - 13.4.82 - pharmacology

292. Hairdressers' Registration Board of South Australia, Unley, S.A. - 14.4.82 - hairdressing

279
293. Australian Turkish Child Care Co-operative Society of New South Wales, Ltd., Alburn, N.S.W. - 15.4.82 - general comments

294. Victorian Association for Multicultural Education, Melbourne, Vic. - 5.4.82 - teaching

295. Department of Immigration and Ethnic Affairs, Brisbane, Qld - 7.4.82 - general comments

296. Premier's Department, Brisbane, Qld - 13.4.82 - general comments

297. Hacks, H., Norman Park, Qld - 19.4.82 - electrical trades

298. The Bankers' Institute of Australasia, Melbourne, Vic. - undated - banking

299. Yugoslav Communities Welfare Workers Group, Sydney, N.S.W. - 19.4.82 - general comments

300. Department of Immigration and Ethnic Affairs, Canberra, A.C.T. - 19.4.82 - general comments

301. Tasmanian College of Advanced Education, Launceston, Tas. - 14.4.82 - general comments

302. Landicho, O.R., Revesby, N.S.W. - 15.4.82 - teaching

303. Newcastle College of Advanced Education, Waratah, N.S.W. - 7.4.82 - general comments

304. Northern Territory of Australia Ombudsman; Darwin, N.T. - 14.4.82 - general comments

305. Bundaberg Sugar Company, Ltd., Bundaberg, Qld - 14.4.82 - general comments

306. Frick, W. Perth, W.A. - 14.4.82 - accountancy

307. Builders Licensing Board of South Australia, Adelaide, S.A. - 8.4.82 - building trades

308. Lister, S.M., Darlinghurst, N.S.W. - 5.4.82 - social work


310. Australian Council of Churches, Woden, A.C.T. - 15.4.82 - plumbing (individual case)

311. Australian Association of Occupational Therapists, Camperdown, N.S.W. - 14.4.82 - occupational therapy
312. Metal Industries Association South Australia, Adelaide, S.A. - 14.4.82 - metal trades
313. Department of Defence, Russell, A.C.T. - 15.4.82 - general comments
314. The Australian Council of Professions, Red Hill, A.C.T. - 16.4.82 - general comments
315. Khmer Community of New South Wales, South Strathfield, N.S.W. - 5.4.82 - refugees
316. National Standing Committee of Medical Superintendents of Australian Hospitals, North Sydney, N.S.W. - 13.4.82 - medicine
317. King E., Norwood, S.A. - 15.4.82 - medicine
318. Chiropractors Board of South Australia, Adelaide, S.A. - 15.4.82 - general comments
319. Catholic Immigration Office, Melbourne, Vic. - 16.4.82 - general comments
320. Federation of Polish Organisations of Victoria, Melbourne, Vic. - 17.4.82 - general comments
321. Ombudsman, Tasmania, Hobart, Tas. - 16.4.82 - general comments
322. Medical School, University of Adelaide, Adelaide, S.A. - 16.4.82 - medicine
323. The Filipino Community Council, Kensington, N.S.W. - 30.3.82 - general comments
324. Overseas Medical Graduates Association, Auburn, N.S.W. - 15.4.82 - medicine
325. Dental Board of Queensland, Brisbane, Qld - 16.4.82 - dentistry
326. Chiropractors Registration Board, Sydney, N.S.W. - 5.4.82 - chiropractics and osteopaths
327. The Greek Orthodox Community of New South Wales, Ltd., Paddington, N.S.W. - 19.4.82 - general comments
328. Board of Optometrical Registration, Sydney, N.S.W. - 24.4.82 - optometry
329. Optometrists Registration Board, Melbourne, Vic. - 20.4.82 - optometry
330. Department of Labour and Industry, Melbourne, Vic. - 15.4.82 - general comments

281
331. The Dental Board of Victoria, Melbourne, Vic. - 20.4.82 - dentistry
332. The Australian Institute of Building, Turner, A.C.T. - 21.4.82 - building industry
333. Tasmanian Council of Advanced Education, Launceston, Tas. - 20.4.82 - general comments
334. Task Force Action for Migrant Women, Hobart, Tas. - 15.4.82 - general comments
335. The Broken Hill Proprietary Company Ltd., Melbourne, Vic. - 16.4.82 - general comments
336. Australian Jewish Welfare and Relief Society, South Yarra, Vic. - 16.4.82 - general comments
337. Public Service Board, Canberra, A.C.T. - 20.4.82 - general comments
338. Migrant Resource Centre Preston-Reservoir, Reservoir, Vic. - 23.4.82 - general comments
339. W.B. Runciman, Bedford Park, S.A. - 23.4.82 - medicine
340. Camilleri J.G., Hawthorn, Vic. - 26.4.82 - medicine
341. Port of Melbourne Authority, Melbourne, Vic. - 31.4.82 - general comments
342. Legal Aid Commission, Acton, A.C.T. - 30.4.82 - general comments
343. Attorney-General's Department, Canberra, A.C.T. - 22.4.82 - legal profession
344. Abignano Ltd., Pymble, N.S.W. - 21.4.82 - construction industry
345. Department of Transport, Canberra, A.C.T. - 23.4.82 - general comments
346. Australian Council of Social Services, Sydney, N.S.W. - 19.4.82 - general comments
347. Sorial M.F., Carlingford, N.S.W. - 19.3.82 - dentistry
348. Australian Institute of Health Surveyors, Camperdown, N.S.W. - 20.4.82 - general comments
349. The Psychologists Board of Queensland, Brisbane, Qld - 28.4.82 - psychologist

282
350. Victorian Employers' Federation, Hawthorn, Vic. - 19.4.82 - general comments
351. North Perth Migrant Resource Centre, North Perth, W.A. - 16.4.82 - general comments
352. Federation of Polish Organizations of Victoria, Melbourne, Vic. - 18.2.82 - health professions
353. Australian Council of Trade Unions (ACTU), Melbourne, Vic. - 21.4.82 - general comments
354. Schaefer G.F., South Yarra, Vic. - 28.4.82 - computer science/EDP
355. Department of the Premier and Cabinet, Adelaide, N.S.W. - 28.4.82 - general comments
356. Ethnic Information Service of the South Australia Ethnic Affairs Commission, Adelaide, S.A. - 30.4.82 - general comments
357. The Department of Technical and Further Education, Adelaide, S.A. - 30.4.82 - general comments
358. Department of Industrial Affairs and Employment, Adelaide, S.A. - 30.4.82 - general comments
359. Multicultural Education Advisory Committee A.C.T., Civic, A.C.T. - 3.5.82 - teaching
360. Department of Agriculture, Sydney, N.S.W. - 27.4.82 - veterinary surgeon
361. Albury-Wodonga Ethnic Communities Council, Wodonga, Vic. - 20.4.82 - general comments
362. The Institute of Foresters of Australia, Inc., Canberra, A.C.T. - 30.4.82 - forestry
363. The Australasian Institute of Mining and Metallurgy, Carlton South, Vic. - 23.4.82 - mining and metallurgy
364. The Australian Institute of Agricultural Science, Parkville, Vic. - 30.4.82 - agricultural scientist
365. NIRIA (Netherlands Engineers Accreditation Authority), Den Haag, Netherlands, 22.4.82 - engineering
366. The Veterinary Board of Victoria, Brunswick, Vic. - 30.4.82 - veterinary science
367. Education Department, Melbourne, Vic. - 30.4.82 - general comments
368. Department of Employment and Industrial Relations, Canberra, A.C.T. 4.5.82 - general comments

369. Schlebaum A, Turramurra, N.S.W. - 29.4.82 - psychiatry

370. Premier's Department, Sydney, N.S.W. - undated - general comments

371. Committee on Overseas Professional Qualifications, Barton, A.C.T. - 7.5.82 - general comments

372. Chanla K., Flemington, Vic. - 18.3.82 - medicine

373. The Royal Australian and New Zealand College of Psychiatrists, Carlton, Vic. - 29.4.82 - psychiatrist

374. Australian Examining Council for Overseas Physiotherapists Incorporated, Barton, A.C.T. - 4.5.82 - physiotherapy

375. Department of Veterans' Affairs, Woden, A.C.T. - 7.5.82 - general comments

376. Australian Institute of Horticulture Incorporated, Richmond, Vic. - 6.5.82 - horticulture

377. Philips Industries Ltd., North Sydney, N.S.W. - 10.5.82 - general comments

378. Toselli J., Hobart, Tas. - 15.4.82 - general comments

379. Wormald International (Australia) Pty. Ltd., Crows Nest, N.S.W. - 10.5.82 - general comments

380. National Accreditation Authority for Translators and Interpreters (NAATI), Belconnen, A.C.T. - 13.5.82 - translating, interpreting

381. Department for Community Welfare, Perth, W.A. - 6.5.82 - general comments

382. Ratnaike R., Woodville, S.A. - 23.4.82 - medicine

383. Burton, J.I.; Buttfield, I.H.; Newble, D.I.; Ratnaike, R.N., Queen Elizabeth Hospital, Woodville, S.A. - 23.4.82 - medicine

384. Department of Health, Woden, A.C.T. - 17.5.82 - medicine and dentistry

385. Darwin Community College, Casuarina, NT - 12.5.82 - general comments

386. Australian Physiotherapy Association, Melbourne, Vic. - 13.5.82 - physiotherapy

284
387. Umhauer J., Bellevue Heights, S.A. - 10.5.82 - technician
388. Forests Department, Como, W.A. - 19.5.82 - general comments
389. Australian Medical Examining Council, Kingston, A.C.T. - 20.5.82 - medicine
390. G. Vaughan M.P., Member for Glenhuntly, Vic. - 18.5.82 - drafting
391. Education Department, Perth, W.A. - 17.5.82 - general comments
392. Department of Labour and Industry, Perth, W.A. - 17.5.82 - general comments
393. Human Rights Commission, Canberra, A.C.T. - 17.5.82 - general comments
394. Dental Technicians Registration Board of New South Wales, Sydney, N.S.W. - 20.4.82 - dental technician, /prosthetist
395. New South Wales Medical Board, Sydney, N.S.W. - 31.3.82 - medicine
396. New South Wales Nurses Registration Board, Sydney, N.S.W. - 29.3.82 - nursing
397. Physiotherapists Registration Board, Haymarket, N.S.W. - 20.5.82 - physiotherapy
398. Commonwealth Department of Education, Commonwealth Schools Commission and A.C.T. Schools Authority, Woden, A.C.T. - 24.5.82 - general comments
399. Department of Employment and Industrial Relations, Canberra, A.C.T. - 24.5.82 - general comments
400. Faculty of Medicine, University of Melbourne, Parkville, Vic. - 4.4.82 - medicine
401. Faculty of Medicine, Monash University, Medical Faculty, Clayton, Vic. - 7.4.82 - medicine
402. Faculty of Medicine, The University of New South Wales, Kensington, N.S.W. - 1.4.82 - medicine
403. Faculty of Medicine, The University of Sydney, Sydney, N.S.W. - 15.4.82 - medicine
404. Faculty of Medicine, The University of Newcastle, Newcastle, N.S.W. - 23.3.82 - medicine
405. Faculty of Medicine, University of Queensland, Herston, Qld - 1.4.82 - medicine

406. School of Medicine, The Flinders University, Bedford Park, S.A. - 6.4.82 - medicine

407. Faculty of Medicine, The University of Tasmania, Hobart, Tas. - 31.3.82 - medicine

408. Registrar, The University of Western Australia, Nedlands, W.A. - 23.4.82 - medicine

409. Vietnamese Community Services Association, Marrickville, N.S.W. - 2.4.82 - general comments

410. Western Australian Institute of Technology, South Bentley, W.A. - 14.5.82 - general comments

411. The Australian Association of Overseas Qualified Dentists, Reservoir, Vic. - 25.5.82 - dentistry

412. Simpson D, Adelaide, S.A. - 24.5.82 - medicine

413. Coopers and Lybrand, Melbourne, Vic. - 24.5.82 - accountancy

414. Polish Welfare and Information Bureau in New South Wales, Ashfield, N.S.W. - 22.5.82 - general comments

415. Iredale R., Macquarie University, Ryde, N.S.W. - undated - medicine

416. Queensland Electricity Generating Board, Brisbane, Qld - 20.5.82 - engineering

417. Hutchison I., Geelong, Vic. - 25.5.82 - nursing

418. PA Australia Pty, Ltd., South Melbourne, Vic. - 21.5.82 - general comments

419. Australian National Railways Commission, North Adelaide, S.A. - 31.5.82 - general comments

420. Vu H.K., Highbury, S.A. - 31.5.82 - medicine

421. Doctors' Reform Society of New South Wales, Sydney, N.S.W. - 28.5.82 - medicine

422. Energy Authority of New South Wales, Sydney, N.S.W. - 27.5.82 - electrical engineering, electrical trades

423. Soil Conservation Service, Sydney, N.S.W. - 27.5.82 - general comments
424. Dairy Industry Marketing Authority, Sydney, N.S.W. - 27.5.82 - general comments
425. Water Resources Commission, Sydney, N.S.W. - 27.5.82 - general comments
426. The Northern Territory Electrical Workers and Contractors Licensing Board, Darwin, NT - 2.6.82 - electrical trades
427. De Jager J.P., South Coogee, N.S.W. - 7.6.82 - medicine
428. Western Australian Department of Tourism, Perth, W.A. - 9.6.82 - travel agent
429. Australian Teachers' Federation, Acton, A.C.T. - 10.6.82 - teaching
430. Technical and Further Education Teachers' Association, Acton, A.C.T. - 10.6.82 - general comments
431. Wilson J.S., Carine, W.A. - 17.6.82 - physiotherapy
432. Overseas Qualified Migrant Doctors, Burwood, N.S.W. - 7.6.82 - medicine
433. Surveyors Board, Belconnen, A.C.T. - 10.6.82 - surveying
434. Australian Arab Women Association, Melbourne, Vic. - 28.6.82 - general comments
435. Department of the Attorney General and of Justice, Sydney, N.S.W. - legal profession
436. Corporate Affairs Commission, Sydney, N.S.W. - 21.5.82 - general comments
437. Hanna H.K., Casula, N.S.W. - 3.7.82 - medicine
438. Amalgamated Metal Workers and Shipwrights' Union, Australasian Society of Engineers and Electrical Trades Union of Australia, Surry Hills, N.S.W. - 12.7.82 - general comments
439. Victorian Ministry of Immigration and Ethnic Affairs, East Melbourne, Vic. - 9.7.82 - general comments
440. Refugee Doctors Group, Australian Jewish Welfare and Relief Society, South Yarra, Vic. - 5.7.82 - medicine
441. Hung - Duc - Nguyen, Collingwood, Vic. - 21.7.82 - medicine
442. Ministry of Employment and Training, Melbourne Vic. - 30.7.82 - accreditation of tradesmen
443. Minister for Industrial Relations, Minister for Technology, Darlinghurst, N.S.W. - Tradesmen's Rights

444. Victoria College Malvern, Vic. - general comments

445. Consultative Committee of State and Territorial Law Admitting Authorities, Melbourne, Vic. - 9.9.82 - legal profession
LIST OF CONSULTATIONS

Consultations were held mainly in those professions and trades which the Committee had decided to examine in detail and where further elaboration of submissions was considered necessary.

<table>
<thead>
<tr>
<th>COMMITTEE ON OVERSEAS PROFESSIONAL QUALIFICATIONS</th>
<th>Place</th>
<th>Date</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mr G Barraclough, O.B.E., member</td>
<td>Canberra</td>
<td>25 June 1982</td>
</tr>
<tr>
<td>The Hon. Mr Justice Jacobs, A.O., member</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Professor E Saint, C.M.G., member</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr J Mulcahy, Executive Director</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>

| DENTISTRY                                          |                        |                          |
| Australian Dental Association                      | Sydney                 | 13 July 1982             |
| Dr R Hessian, President                            |                        |                          |
| Dr S Halikis                                       |                        |                          |
| Dr N Henry                                         |                        |                          |
| Dr S King                                          |                        |                          |
| Mr C Wall, Secretary                               |                        |                          |

<table>
<thead>
<tr>
<th>The Australian Association of Overseas Qualified Dentists</th>
<th>Melbourne</th>
<th>15 July 1982</th>
</tr>
</thead>
<tbody>
<tr>
<td>Mr L Doukas</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mrs S Doukas</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Mr M Komser</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ms O Mostafa</td>
<td></td>
<td></td>
</tr>
<tr>
<td>Ms K Smiglewska</td>
<td></td>
<td></td>
</tr>
</tbody>
</table>
Group of Unregistered Dentists

Mr M Chanla
Ms A Gizinska
Ms Pey Yung Ja
Mr S Nantharath
Mr Nan Pho
Mr Phan Tan Phung
Mr L Sztejnberg

Royal Dental Hospital, Melbourne

Dr J Dawkins, President of Dental Board of Victoria

Melbourne Dentist

Dr G Bowell, registered dentist in private practice

University of Melbourne

Professor J Waterson, Dean of Faculty of Dentistry

Melbourne Dentist

Mr P Finch, former member of Dental Board of Victoria, member of COPQ Expert Panel in Dentistry

Westmead School of Dental Therapy

Dr P Davies, Director of Training

University of Sydney

Professor N Martin, Dean, Faculty of Dentistry

Dr G Craig, Senior Lecturer, Dentistry

Dr N Duckmanton, Senior Lecturer in Prosthetic Dentistry
United Dental Hospital
Dr C Savage, Superintendent

Overseas Qualified Dentists
Mr Pavan Kumar Chandra
Mr E Kabza
Ms E Olejnik
Ms K Peninska
Mr Maher Farid Sorial

Dental Board of NSW
Dr E Gee, President, member of COPQ Expert Panel in Dentistry

Newcastle Dentist
Dr B Capper, former Dental Director of Newcastle Hospital

South Australian Dental Board
Dr J Day, President, member of COPQ Expert Panel in Dentistry

South Australian Dental Service
Dr H Kennare, Chief Executive Officer

University of Adelaide
Professor J Thonard, Dean, Faculty of Dentistry, Past Convenor of COPQ Dentistry Clinical Examination Subcommittee
Dr G Mount, Chairman, Postgraduate Committee in Dentistry, member of COPQ Dentistry Clinical Examination Subcommittee
Dr O Makinson, Reader, Restorative Dentistry, Convenor of COPQ Dentistry Screening Examination Subcommittee
Overseas Qualified Dentists

Adelaide 4 August 1982

Mr Hung Khoe Vu

Mr Asy Makkar

Mrs E Varga (Dental Therapist)

COPQ Expert Panel in Dentistry

Canberra 22 August 1982

Professor K Sutherland, Chairman

Dr P Finch, former member of Dental Board of Victoria

Dr J Day, President, Dental Board of Victoria

Dr N Henry, member, Dental Board of Queensland

Mr E Gee, President, Dental Board of NSW

Mr J Mulcahy, Executive Director, COPQ

Mr M Brandon, COPQ Secretariat

ENGINEERING

Institution of Engineers, Australia

Canberra 2 June 1982

Mr E Storr, Secretary

Mr H Borchartd, Chairman, Foreign Qualifications Committee

Mr W McKensey, Chairman, Board of Examiners

Mr G Basset, Education Officer

ETHNIC ORGANISATIONS

North Perth Migrant Resource Centre

Perth 30 June 1982

Ms H Dean-Oswald, President, Committee of Management

Mr C Pierluigi, Co-ordinator
The Federation of Polish Organisations in South Australia Inc.

Adelaide 5 August 1982

Mr A Szczigielski, President

Mr H Tomaszewski, Senior Welfare Worker

Mr & Mrs Zurawel, engineer and teacher, recent Polish immigrants

MEDICINE

Working Party of the Resident Medical Staff Advisory Committee to the Health Commission of NSW

Sydney 16 June 1982

Dr T Smyth, Medical Administrator, Division of Hospitals

Dr J Suthers, Medical Administrator, Royal North Shore Hospital, St Leonard's

Dr P Brennan, Director of Medical Administration, Prince Henry/Prince of Wales Hospital Group, Randwick

Mr J Robertson, Assistant to Dean of Faculty of Medicine, University of NSW

Sydney University, Faculty of Medicine

Sydney 16 June 1982

Professor Gye, Dean

Mr D Swinbourne, Assistant to Dean

Doctors Reform Society

Sydney 16 June 1982

Dr A Liebhold, President, NSW Branch

Prince of Wales Hospital Group

Sydney 16 June 1982

Dr J de Jager, Senior Rheumatology Registrar, Prince Henry Hospital, successful AMEC candidate
Overseas Medical Graduates
Association
Sydney 16 June 1982

Dr P Malhotra, Secretary of Association
Dr G Marcar, member

Victorian Academy for General
Practice
Melbourne 17 June 1982

Dr J Fraillon, Medical Co-ordinator,
Education, Training and Research

Greenvale Geriatric Centre
Melbourne 17 June 1982

Dr J Wijeyesekera, Medical Director

Queen Elizabeth Hospital, Adelaide
Adelaide 22 June 1982

Mr T B Prescott, A.M., Chairman,
Board of Management

Queen Elizabeth Hospital Group
Adelaide 23 June 1982

Ms J Burton, Senior Lecturer in English,
Adult Migrant Education Service, S.A.

Dr I Buttfield, Staff Physician,
Department of Nuclear Medicine

Dr Le Cong Phuc, registered medical practitioner
in South Australia, with overseas
qualifications

Dr Le Tan Thanh, AMEC candidate

Dr D Newble, Senior Lecturer in Medicine,
University of Adelaide

Dr Ngo Thi My, AMEC candidate

Dr R Ratnaike, Senior Lecturer in Medicine,
University of Adelaide

Informal Group of S.A. registered
doctors affected by portability limits
Adelaide 23 June 1982

Dr P Azzopardi, Senior Specialist Anaesthetist,
Lyell McEwen Hospital

Dr S Bencinni, Senior Gynaecologist,
Royal Adelaide Hospital
Dr S Orell, Associate Professor,  
Cytology, Flinders Medical Centre

Dr W Runciman, Senior Staff Specialist/Lecturer, 
Intensive Care Unit,  
Flinders Medical Centre

Dr R Seshadri, Senior Staff Specialist,  
Department of Haematology,  
Flinders Medical Centre

Department of Neurosurgery, Adelaide  
Adelaide  
Childrens Hospital  
23 June 1982

Dr P Livingstone, President, Medical Board of Qld

Dr H Maynard Rennie, Nominee of the A.M.A.

Dr R Steele, President, Medical Board of South Australia

Dr P Tomlinson, President, NSW Medical Board

Dr R Wall, President, Medical Council of Tasmania

Professor M Walters, Dean, Faculty of Medicine, 
University of Western Australia

Mr P Fisher, Secretary to AMEC
Secretaries/Registrars of Medical Boards

Mrs M Beard, Registrar, Medical Board of the Northern Territory

Mr K Bradbury, Registrar, Medical Board of Western Australia

Mr R Cottle, Registrar, Medical Board of Queensland

Mr G Leamon, Secretary, Medical Council of Tasmania

Mr A Lim, Secretary, Medical Board of the A.C.T.

Mrs H Robertson, Secretary, Medical Board of New South Wales

Mr J Smith, Secretary, Medical Board of Victoria

Mr D Wilde, Registrar, Medical Board of South Australia

Queen Elizabeth Hospital Group

Dr I Buttfield, Staff Physician, Department of Nuclear Medicine

South Australian Health Commission

Dr B Kearney, Deputy Chief Executive Officer

Dr A Connon, Medical Co-ordinator, Chairman's Office

South Australian Medical Board

Dr R Steele, President

Professor A Wangel, Chairman, Department of Medicine, Queen Elizabeth Hospital

Mr D. Wilde, Registrar

Commonwealth Department of Health

Dr C Evans, Deputy Director-General

Mr P Pflaum, First Assistant Director-General, Policy and Planning Division
Dr B Kean, Migrant Health Unit

Mrs R Cotton, Executive Officer, International Health and Tuberculosis Branch

Mr D Murray, Director, Health Manpower Section

PHYSIOTHERAPY

Overseas Qualified Physiotherapists Sydney 13 August 1982

Mrs M Morales

Mrs D Jayawardena

Overseas Qualified and Australian Registered Physiotherapist Sydney 13 August 1982

Mrs V Meade, successful AECOP candidate

St George Hospital, Kogarah Sydney 13 August 1982

Mr P Ruz, Head of Physiotherapy Department, successful AECOP candidate

Australian Physiotherapy Association Sydney 13 August 1982

Dr L Twomey, President

Australian Examining Council of Physiotherapy Sydney 13 August 1982

Professor M Bullock, Chairman, Head, Dept of Physiotherapy, University of Queensland, member, Qld Physiotherapists Registration Board
Unions

Mr R Scott, National President, Amalgamated Metal Workers' and Shipwrights' Union

Mr T Addison, Secretary, Australasian Society of Engineers

Mr R Perriam, Secretary, Electrical Trades Union of Australia

Australia – New Zealand Reciprocity Association (Plumbers)

Mr R Puffett, Member of Executive Committee of ANZRA and NSW's Plumbers, Gasfitters and Drainers Board

Mr A Eagleton, Executive Officer of ANZRA, and Registrar of NSW's Plumbers, Gasfitters and Drainers Board

Regulatory Authorities Licensing Committee (RALC), Electricity Supply Association of Australia

Mr J Dembecki, Chairman of RALC and General Manager of Energy Authority of NSW

Mr K Dooley, Regulation and Safety Engineer, Energy Authority of NSW

Mr J Cummins, Secretary, Electrical Contractors and Electricians Licensing Advisory Committee to the Energy Authority of NSW

Commonwealth Department of Employment and Industrial Relations

Mr G Holmes, First Assistant Secretary, Wages, Policy and Analysis Division

Mr D Stevenson, Assistant Secretary, Occupational Analysis Branch

Mr I O'Malley, Assistant Secretary, Trade Recognition and Industrial Relations Education Branch
Mr B Purnell, Principal Executive Officer,  
Trade Recognition and Industrial Relations Education Branch

Mr D Power, Principal Executive Officer,  
Manpower, Policy and Programs Branch

OTHER

Professor D Myers, C.M.G.,  
Chairman, Committee on Overseas Professional Qualifications

Mr M Codd, Secretary,  
Department of Industrial Relations

The Hon. C.E. Masters, MLC  
Minister for Labour and Industry and Immigration

Melbourne 26 January 1982

Canberra 15 February 1982

Perth 1 July 1982
# List of Occupational Categories*

## WORKER CODES (OCCUPATIONAL CATEGORIES)

<table>
<thead>
<tr>
<th>Code</th>
<th>Meaning</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td><strong>RURAL WORKERS</strong></td>
</tr>
<tr>
<td>W001</td>
<td>Rural, hunting and fishing workers</td>
</tr>
<tr>
<td></td>
<td><strong>PROFESSIONAL, TECHNICAL AND RELATED WORKERS MEDICAL AND PARAMEDICAL</strong></td>
</tr>
<tr>
<td>W010</td>
<td>Chiropodists</td>
</tr>
<tr>
<td>W011</td>
<td>Clinical Psychologists</td>
</tr>
<tr>
<td>W012</td>
<td>Dental Hygienists, Therapists</td>
</tr>
<tr>
<td>W014</td>
<td>Dietitians</td>
</tr>
<tr>
<td>W015</td>
<td>Matrons, Nurses (Hospital)</td>
</tr>
<tr>
<td>W016</td>
<td>Medical Laboratory Technologists</td>
</tr>
<tr>
<td>W017</td>
<td>Medical Practitioners and specialists</td>
</tr>
<tr>
<td>W018</td>
<td>Nurses (other than hospital)</td>
</tr>
<tr>
<td>W019</td>
<td>Occupational Therapists</td>
</tr>
<tr>
<td>W020</td>
<td>Optometrists</td>
</tr>
<tr>
<td>W021</td>
<td>Orthoptists</td>
</tr>
<tr>
<td>W022</td>
<td>Pharmaceutical Chemists</td>
</tr>
<tr>
<td>W023</td>
<td>Physiotherapists, Masseurs</td>
</tr>
<tr>
<td>W024</td>
<td>Social Workers, Welfare Workers</td>
</tr>
<tr>
<td>W025</td>
<td>Speech Therapists</td>
</tr>
<tr>
<td>W026</td>
<td>Veterinary Surgeons</td>
</tr>
<tr>
<td>W030</td>
<td>Other Medical and Para-medical</td>
</tr>
<tr>
<td></td>
<td><strong>ENGINEERING AND SCIENCE</strong></td>
</tr>
<tr>
<td>W031</td>
<td>Agricultural Scientists including Foresters</td>
</tr>
<tr>
<td>W032</td>
<td>Architects</td>
</tr>
<tr>
<td>W033</td>
<td>Biologists, Biochemists</td>
</tr>
<tr>
<td>W034</td>
<td>Chemists - Industrial/Research</td>
</tr>
<tr>
<td>W035</td>
<td>Draftsmen - Architectural</td>
</tr>
<tr>
<td>W036</td>
<td>Draftsmen - Civil Engineering</td>
</tr>
<tr>
<td>W037</td>
<td>Draftsmen - Electrical, Electronics Engineering</td>
</tr>
<tr>
<td>W038</td>
<td>Draftsmen - Mechanical Engineering</td>
</tr>
<tr>
<td>W039</td>
<td>Draftsmen - Survey</td>
</tr>
<tr>
<td>W040</td>
<td>Engineers - Aeronautical</td>
</tr>
<tr>
<td>W041</td>
<td>Engineers - Agricultural</td>
</tr>
<tr>
<td>W042</td>
<td>Engineers - Automotive</td>
</tr>
</tbody>
</table>

* Extracted from Migrant Entry Handbook, DIEA, 1982, Chapter 22.
<table>
<thead>
<tr>
<th>Code</th>
<th>Meaning</th>
</tr>
</thead>
<tbody>
<tr>
<td>W043</td>
<td>Engineers - Chemical</td>
</tr>
<tr>
<td>W044</td>
<td>Engineers - Civil (Structural, Land Transport, Hydraulics etc)</td>
</tr>
<tr>
<td>W045</td>
<td>Engineers - Electrical</td>
</tr>
<tr>
<td>W046</td>
<td>Engineers - Electronics, Telecommunications, Computer</td>
</tr>
<tr>
<td>W047</td>
<td>Engineers - Industrial, Production etc</td>
</tr>
<tr>
<td>W048</td>
<td>Engineers - Instrumentation</td>
</tr>
<tr>
<td>W049</td>
<td>Engineers - Marine</td>
</tr>
<tr>
<td>W050</td>
<td>Engineers - Mechanical, including Air Conditioning/Refrigeration</td>
</tr>
<tr>
<td>W051</td>
<td>Engineers - Mining, Metallurgical, Geological etc</td>
</tr>
<tr>
<td>W052</td>
<td>Geologists, Mineralogists, Petrologists etc</td>
</tr>
<tr>
<td>W053</td>
<td>Geophysicists and other Earth Scientists</td>
</tr>
<tr>
<td>W054</td>
<td>Mathematicians</td>
</tr>
<tr>
<td>W055</td>
<td>Metallurgists, Assayers (Professional)</td>
</tr>
<tr>
<td>W056</td>
<td>Physicists (Chemical, Nuclear, Electronics, Acoustics etc)</td>
</tr>
<tr>
<td>W057</td>
<td>Quantity Surveyors</td>
</tr>
<tr>
<td>W058</td>
<td>Scientific Technologists (not elsewhere included)</td>
</tr>
<tr>
<td>W059</td>
<td>Surveyors - Land (Cadastral, Engineering, Geodetic etc.)</td>
</tr>
<tr>
<td>W060</td>
<td>Town and Regional Planners</td>
</tr>
<tr>
<td>W064</td>
<td>Other Life Scientists</td>
</tr>
<tr>
<td>W065</td>
<td>Other Scientific Occupations</td>
</tr>
</tbody>
</table>

**BUSINESS AND COMMERCE**

<table>
<thead>
<tr>
<th>Code</th>
<th>Meaning</th>
</tr>
</thead>
<tbody>
<tr>
<td>W066</td>
<td>Accountants (not public)</td>
</tr>
<tr>
<td>W067</td>
<td>Administrator (Government)</td>
</tr>
<tr>
<td>W068</td>
<td>Auctioneers, Valuers</td>
</tr>
<tr>
<td>W069</td>
<td>Barristers, Solicitors, Law Clerks (Articled)</td>
</tr>
<tr>
<td>W070</td>
<td>Company Secretaries</td>
</tr>
<tr>
<td>W071</td>
<td>Computer Programmers</td>
</tr>
<tr>
<td>W072</td>
<td>Economists</td>
</tr>
<tr>
<td>W073</td>
<td>Institution, Association Secretaries</td>
</tr>
<tr>
<td>W074</td>
<td>Insurance Agents, Inspectors, Loss Assessors</td>
</tr>
<tr>
<td>W075</td>
<td>Managers, Agents (Land, Estate and Property)</td>
</tr>
<tr>
<td>W076</td>
<td>Managers Catering, Catering Consultants, Caterers</td>
</tr>
<tr>
<td>W077</td>
<td>Managers - Club, Hotel etc</td>
</tr>
<tr>
<td>W078</td>
<td>Managers of Establishments (so described)</td>
</tr>
<tr>
<td>W079</td>
<td>Managers by Function (so described)</td>
</tr>
<tr>
<td>W080</td>
<td>Statisticians</td>
</tr>
<tr>
<td>W081</td>
<td>Systems Analysts (Data Processing)</td>
</tr>
<tr>
<td>W085</td>
<td>Other Business and Commerce</td>
</tr>
<tr>
<td>Code</td>
<td>Meaning</td>
</tr>
<tr>
<td>------</td>
<td>---------</td>
</tr>
<tr>
<td>W086</td>
<td>Announcers, Arrangers etc (Television and Radio)</td>
</tr>
<tr>
<td>W087</td>
<td>Commercial Artists</td>
</tr>
<tr>
<td>W088</td>
<td>Other Artists</td>
</tr>
<tr>
<td>W089</td>
<td>Directors, Producers (Theatre, Television, Radio, Film)</td>
</tr>
<tr>
<td>W090</td>
<td>Editors, Journalists</td>
</tr>
<tr>
<td>W091</td>
<td>Librarians, Library Assistants (Qualified)</td>
</tr>
<tr>
<td>W092</td>
<td>Managers - Rural, Fishing and Hunting</td>
</tr>
<tr>
<td>W093</td>
<td>Photographers, Television Cameramen, Film Editors</td>
</tr>
<tr>
<td>W094</td>
<td>Pilots (Aircraft)</td>
</tr>
<tr>
<td>W095</td>
<td>Professors, Lecturers etc - Tertiary Institutions</td>
</tr>
<tr>
<td>W096</td>
<td>Psychologists (not clinical)</td>
</tr>
<tr>
<td>W097</td>
<td>Ships Officers</td>
</tr>
<tr>
<td>W098</td>
<td>Teachers - Kindergarten</td>
</tr>
<tr>
<td>W099</td>
<td>Teachers - Primary School</td>
</tr>
<tr>
<td>W100</td>
<td>Teachers - Secondary School</td>
</tr>
<tr>
<td>W101</td>
<td>Teachers - Special (Art, Craft, Music etc)</td>
</tr>
<tr>
<td>W102</td>
<td>Teachers - Technical or Industrial School</td>
</tr>
<tr>
<td>W103</td>
<td>Teachers - Other</td>
</tr>
<tr>
<td>W104</td>
<td>Ministers of Religion</td>
</tr>
<tr>
<td>W109</td>
<td>Other Professionals (not elsewhere included)</td>
</tr>
</tbody>
</table>

**OTHER PROFESSIONALS**

**TECHNICIANS**

| W110 | Technicians - Dental |
| W111 | Technicians - Electrical, Electronics, Communications (not Radio or TV) |
| W112 | Technicians - Industrial (stone, chemical, leather, rubber, plastic) |
| W113 | Technicians - Medical and related laboratory |
| W114 | Technicians - Production (not elsewhere included) |
| W115 | Technicians - Radio and Television Broadcasting |
| W116 | Technicians - Scientific and Laboratory (industrial) |
| W120 | Other Technicians (not elsewhere included) |

**CLERICAL COMMERCIAL AND ADMINISTRATIVE WORKERS**

<p>| W121 | Proprietors and Contractors (non-professional) |
| W122 | Managers (non-professional) |
| W123 | Clerks, male |
| W124 | Clerks, female |
| W125 | Typists, stenographers |
| W126 | Office machinists and assistants |
| W127 | Receptionists |
| W128 | Outdoor clerical workers |
| W129 | Tram/bus conductors and conductresses |
| W130 | Salesmen/saleswomen (indoor) |
| W131 | Sales representatives |</p>
<table>
<thead>
<tr>
<th>Code</th>
<th>Meaning</th>
</tr>
</thead>
<tbody>
<tr>
<td>SKILLED MINING OCCUPATIONS</td>
<td></td>
</tr>
<tr>
<td>W135</td>
<td>Skilled mining occupations</td>
</tr>
<tr>
<td>SKILLED BUILDING AND CONSTRUCTION TRades</td>
<td></td>
</tr>
<tr>
<td>W140</td>
<td>Bricklayers</td>
</tr>
<tr>
<td>W141</td>
<td>Carpenters</td>
</tr>
<tr>
<td>W142</td>
<td>Joiners (in workshop)</td>
</tr>
<tr>
<td>W143</td>
<td>Fibrous plasterers</td>
</tr>
<tr>
<td>W144</td>
<td>Painters, decorators &amp; signwriters</td>
</tr>
<tr>
<td>W145</td>
<td>Plasterers (solid)</td>
</tr>
<tr>
<td>W146</td>
<td>Plumbers and gasfitters</td>
</tr>
<tr>
<td>W147</td>
<td>Tilers (roof)</td>
</tr>
<tr>
<td>W148</td>
<td>Tilers (wall &amp; floor)</td>
</tr>
<tr>
<td>W149</td>
<td>Stonemasons (various)</td>
</tr>
<tr>
<td>W150</td>
<td>Flat glass tradesmen</td>
</tr>
<tr>
<td>W151</td>
<td>Riggers</td>
</tr>
<tr>
<td>W152</td>
<td>Other skilled building &amp; construction trades</td>
</tr>
<tr>
<td>SKILLED METAL &amp; ELECTRICAL TRADES</td>
<td></td>
</tr>
<tr>
<td>W160</td>
<td>Blacksmiths</td>
</tr>
<tr>
<td>W161</td>
<td>Boilermakers (Railways)</td>
</tr>
<tr>
<td>W162</td>
<td>Boilermakers (Shipbuilding)</td>
</tr>
<tr>
<td>W163</td>
<td>Boilermakers (Structural)</td>
</tr>
<tr>
<td>W164</td>
<td>Boilermakers (other)</td>
</tr>
<tr>
<td>W165</td>
<td>Jobbing moulders &amp; coremakers</td>
</tr>
<tr>
<td>W166</td>
<td>Toolmakers/diemakers</td>
</tr>
<tr>
<td>W167</td>
<td>Machine-setters</td>
</tr>
<tr>
<td>W168</td>
<td>Fitters</td>
</tr>
<tr>
<td>W169</td>
<td>Turners</td>
</tr>
<tr>
<td>W170</td>
<td>Fitters &amp; turners</td>
</tr>
<tr>
<td>W171</td>
<td>First class machinists</td>
</tr>
<tr>
<td>W172</td>
<td>Coppersmiths</td>
</tr>
<tr>
<td>W173</td>
<td>Sheet metal workers (first class)</td>
</tr>
<tr>
<td>W174</td>
<td>Panel beaters</td>
</tr>
<tr>
<td>W175</td>
<td>Patternmakers</td>
</tr>
<tr>
<td>W176</td>
<td>Shipwrights</td>
</tr>
<tr>
<td>W177</td>
<td>Welder (first class)</td>
</tr>
<tr>
<td>W178</td>
<td>Motor mechanics</td>
</tr>
<tr>
<td>W179</td>
<td>Aircraft maintenance engineers</td>
</tr>
<tr>
<td>W180</td>
<td>Electrical fitters and/or armature winders</td>
</tr>
<tr>
<td>W181</td>
<td>Electrical fitters (Automotive)</td>
</tr>
<tr>
<td>W182</td>
<td>Electrical mechanics</td>
</tr>
<tr>
<td>W183</td>
<td>Telephone &amp; telegraph mechanics</td>
</tr>
<tr>
<td>W184</td>
<td>Tradesmen radio</td>
</tr>
<tr>
<td>W185</td>
<td>Linesmen</td>
</tr>
<tr>
<td>W186</td>
<td>Refrigeration mechanics</td>
</tr>
<tr>
<td>W187</td>
<td>Sewing machine mechanics</td>
</tr>
</tbody>
</table>

303
<table>
<thead>
<tr>
<th>Code</th>
<th>Meaning</th>
</tr>
</thead>
<tbody>
<tr>
<td>W188</td>
<td>Business equipment mechanics</td>
</tr>
<tr>
<td>W189</td>
<td>Watch/clock makers</td>
</tr>
<tr>
<td>W190</td>
<td>Instrument makers</td>
</tr>
<tr>
<td>W191</td>
<td>Motor trimmers</td>
</tr>
<tr>
<td>W192</td>
<td>Annealers and/or case hardeners</td>
</tr>
<tr>
<td>W193</td>
<td>Tradesmen heat treaters</td>
</tr>
<tr>
<td>W194</td>
<td>Electroplaters (first class)</td>
</tr>
<tr>
<td>W195</td>
<td>Motor body builders (first class)</td>
</tr>
<tr>
<td>W196</td>
<td>Vehicle painters (first class)</td>
</tr>
<tr>
<td>W197</td>
<td>Locksmiths</td>
</tr>
<tr>
<td>W198</td>
<td>Safemakers and/or repairers</td>
</tr>
<tr>
<td>W199</td>
<td>Other skilled metal &amp; electrical trades</td>
</tr>
</tbody>
</table>

**OTHER SKILLED TRADES.**

<table>
<thead>
<tr>
<th>Code</th>
<th>Meaning</th>
</tr>
</thead>
<tbody>
<tr>
<td>W201</td>
<td>Glass trades</td>
</tr>
<tr>
<td>W202</td>
<td>Brick, tile &amp; pottery trades</td>
</tr>
<tr>
<td>W203</td>
<td>Tannery, leather &amp; canvas trades</td>
</tr>
<tr>
<td>W204</td>
<td>Rubber &amp; plastic trades</td>
</tr>
<tr>
<td>W205</td>
<td>Textile mechanics</td>
</tr>
<tr>
<td>W206</td>
<td>Loom tuners</td>
</tr>
<tr>
<td>W207</td>
<td>Dressmakers</td>
</tr>
<tr>
<td>W208</td>
<td>Tailors</td>
</tr>
<tr>
<td>W209</td>
<td>Cutters</td>
</tr>
<tr>
<td>W210</td>
<td>Other skilled clothing and textile trades</td>
</tr>
<tr>
<td>W211</td>
<td>Footwear trades</td>
</tr>
<tr>
<td>W212</td>
<td>Slaughtermen</td>
</tr>
<tr>
<td>W213</td>
<td>Butchers</td>
</tr>
<tr>
<td>W214</td>
<td>Smallgoods' makers</td>
</tr>
<tr>
<td>W215</td>
<td>Bread makers and bakers</td>
</tr>
<tr>
<td>W216</td>
<td>Pastry cooks</td>
</tr>
<tr>
<td>W217</td>
<td>Cooks</td>
</tr>
<tr>
<td>W218</td>
<td>Other skilled food and drink trades</td>
</tr>
<tr>
<td>W219</td>
<td>Tobacco trades</td>
</tr>
<tr>
<td>W220</td>
<td>Chair and couch makers</td>
</tr>
<tr>
<td>W221</td>
<td>Cabinet makers</td>
</tr>
<tr>
<td>W222</td>
<td>Furniture polishers</td>
</tr>
<tr>
<td>W223</td>
<td>Upholsterers</td>
</tr>
<tr>
<td>W224</td>
<td>Wood machinists</td>
</tr>
<tr>
<td>W225</td>
<td>Other skilled woodworking, timber and furniture trades</td>
</tr>
<tr>
<td>W226</td>
<td>Paper trades</td>
</tr>
<tr>
<td>W227</td>
<td>Bookbinding and finishing trades</td>
</tr>
<tr>
<td>W228</td>
<td>Letterpress printing trades</td>
</tr>
<tr>
<td>W229</td>
<td>Photo engraving trades</td>
</tr>
<tr>
<td>W230</td>
<td>Lithographic printing trades</td>
</tr>
<tr>
<td>W231</td>
<td>Photogravure printing trades</td>
</tr>
<tr>
<td>W232</td>
<td>Stereotyping, electrotyping trades</td>
</tr>
<tr>
<td>W233</td>
<td>Screen printing trades</td>
</tr>
<tr>
<td>W234</td>
<td>Jewellery makers and repairers</td>
</tr>
<tr>
<td>Code</td>
<td>Meaning</td>
</tr>
<tr>
<td>------</td>
<td>---------</td>
</tr>
<tr>
<td>W235</td>
<td>Boatbuilders</td>
</tr>
<tr>
<td>W236</td>
<td>Dry cleaners</td>
</tr>
<tr>
<td>W237</td>
<td>Laboratory assistants</td>
</tr>
<tr>
<td>W238</td>
<td>Other skilled trades and occupations (not elsewhere included)</td>
</tr>
</tbody>
</table>

**SEMI-SKILLED WORKERS**

<table>
<thead>
<tr>
<th>Code</th>
<th>Meaning</th>
</tr>
</thead>
<tbody>
<tr>
<td>W251</td>
<td>Mining and quarrying workers</td>
</tr>
<tr>
<td>W252</td>
<td>Builders' labourers</td>
</tr>
<tr>
<td>W253</td>
<td>Other building &amp; construction workers</td>
</tr>
<tr>
<td>W254</td>
<td>Metal trades assistants</td>
</tr>
<tr>
<td>W255</td>
<td>Other metal &amp; electrical workers</td>
</tr>
<tr>
<td>W256</td>
<td>Glass workers</td>
</tr>
<tr>
<td>W257</td>
<td>Brick, tile and pottery workers</td>
</tr>
<tr>
<td>W258</td>
<td>Chemical workers</td>
</tr>
<tr>
<td>W259</td>
<td>Tannery workers</td>
</tr>
<tr>
<td>W260</td>
<td>Leather &amp; canvas workers</td>
</tr>
<tr>
<td>W261</td>
<td>Rubber &amp; plastic workers</td>
</tr>
<tr>
<td>W262</td>
<td>Clothing and textile workers</td>
</tr>
<tr>
<td>W263</td>
<td>Footwear workers</td>
</tr>
<tr>
<td>W264</td>
<td>Food and drink workers</td>
</tr>
<tr>
<td>W265</td>
<td>Tobacco workers</td>
</tr>
<tr>
<td>W266</td>
<td>Woodworking, timber and furniture workers</td>
</tr>
<tr>
<td>W267</td>
<td>Paper workers</td>
</tr>
<tr>
<td>W268</td>
<td>Printing workers</td>
</tr>
<tr>
<td>W269</td>
<td>Dry cleaning &amp; laundry workers</td>
</tr>
<tr>
<td>W270</td>
<td>Other semi-skilled factory workers</td>
</tr>
<tr>
<td>W271</td>
<td>Carters, drivers &amp; deliverymen</td>
</tr>
<tr>
<td>W272</td>
<td>Construction equipment drivers</td>
</tr>
<tr>
<td>W273</td>
<td>Crane, hoist and stationary engine drivers</td>
</tr>
<tr>
<td>W274</td>
<td>Packers &amp; Storemen</td>
</tr>
<tr>
<td>W275</td>
<td>Other semi-skilled workers (not manufacturing)</td>
</tr>
<tr>
<td>W276</td>
<td>Professional, technical and skilled workers - qualifications not fully recognised</td>
</tr>
</tbody>
</table>

**UNSKILLED WORKERS**

<table>
<thead>
<tr>
<th>Code</th>
<th>Meaning</th>
</tr>
</thead>
<tbody>
<tr>
<td>W301</td>
<td>Heavy work foundries, steel mills etc</td>
</tr>
<tr>
<td>W302</td>
<td>Labourers on railway track work, roads etc</td>
</tr>
<tr>
<td>W303</td>
<td>Factory and other labourers</td>
</tr>
</tbody>
</table>

**SERVICE OCCUPATIONS**

<table>
<thead>
<tr>
<th>Code</th>
<th>Meaning</th>
</tr>
</thead>
<tbody>
<tr>
<td>W311</td>
<td>Policemen &amp; Policewomen</td>
</tr>
<tr>
<td>W312</td>
<td>Firemen</td>
</tr>
<tr>
<td>W313</td>
<td>Other protective service workers</td>
</tr>
<tr>
<td>W314</td>
<td>Hairdressers</td>
</tr>
<tr>
<td>W315</td>
<td>Waiters and waitresses</td>
</tr>
<tr>
<td>Code</td>
<td>Meaning</td>
</tr>
<tr>
<td>------</td>
<td>--------------------------------------------------</td>
</tr>
<tr>
<td>W316</td>
<td>Hotel, guest house and catering occupations</td>
</tr>
<tr>
<td>W317</td>
<td>Caretakers and office cleaners</td>
</tr>
<tr>
<td>W318</td>
<td>Other service occupations</td>
</tr>
<tr>
<td>W319</td>
<td>Private domestics</td>
</tr>
<tr>
<td>W320</td>
<td>Gardeners</td>
</tr>
<tr>
<td>W330</td>
<td>Not previously employed</td>
</tr>
<tr>
<td>W340</td>
<td>Apprentices</td>
</tr>
</tbody>
</table>

**PERSONS NOT EMPLOYED FOR WAGES**

<table>
<thead>
<tr>
<th>Code</th>
<th>Meaning</th>
</tr>
</thead>
<tbody>
<tr>
<td>W350</td>
<td>Retired persons (age grounds)</td>
</tr>
<tr>
<td>W351</td>
<td>Retired persons (disability)</td>
</tr>
<tr>
<td>W352</td>
<td>Retired persons (other)</td>
</tr>
<tr>
<td>W353</td>
<td>Home duties</td>
</tr>
<tr>
<td>W354</td>
<td>Non-working children</td>
</tr>
</tbody>
</table>
3 Precis of Major Findings

3.1 The major findings of the Review Team are as follows:

The environment of the Secretariat imposes unusual restraints on the way it carries out the work of the Committee. The fact that it is unable to impose its assessments on State and other bodies is a major contributing factor to the complexity of the Secretariat's methods and procedures. The staffing consists of public servants and non public service registrars employed under grant-in-aid programmes, and the Secretariat relies on a good deal of unpaid labour in panel members and university staff in obtaining much of its research material.

The Secretariat staff have developed considerable and unique skills in assessing overseas qualifications, supplemented by the unconventional Library.

The majority of the Library collection is uncatalogued.

Heavy caseloads are preventing the maintenance and development of the research and information base, which is causing deterioration of the credibility of the Secretariat's services.

The functions performed by the Committee and Secretariat appear to have significant benefits in cost savings to the Government and in supplying graduates and professionals to the Australian workforce.

The Secretariat provides assessments of overseas qualifications to prospective migrants (55% of caseload) and to persons resident in Australia (45% caseload).

Lack of staffing within ceiling, inefficient application methods and outdated clerical systems such as manual card index systems are pushing minor functions upward in the structure; thereby disrupting the functions of senior staff and slowing down the research and assessment processes.
The manual storage of information and examination materials is now inadequate, and there is considerable scope for installation of ADP storage and retrieval facilities.

The expansion of the Committee's Terms of Reference in 1978 and the absorption of OQS in 1979, has had the effect of rapidly increasing workloads and causing unmanageable responsibilities in a time of economic, resource and staffing restraint. Restraints in other government agencies, tertiary institutions, and professional bodies are creating additional load for the Secretariat. Public accountability also causes these organisations to seek COPQ advice on an increasing number of academic decisions. Following the Review of Commonwealth Functions, the Department of Education no longer advises the Public Service on the acceptability of qualifications for employment. This responsibility has been accepted by the Secretariat.

Despite ad hoc adjustments to the working organisation of the Secretariat and the high commitment of the staff, the Secretariat is unable to cope with its workload. There are some expert panels in which progress has been very slow and which create large workloads and there are panels for which there is no prospect of adequate service. The Secretariat should bring these facts to the Committee's attention.

4 Recommendations

Detailed recommendations of the review are listed below; paragraph references are shown in brackets. The review team recommends that:

Administration Sub-section

1. Variations, as shown in Appendix B, be made to the duty statements of the CA2 and CA3 positions, to reflect the current duties performed. (5.1.3)

2. To facilitate more accurate and timely planning and control of COPQ expenditure, the Secretariat should be allocated a separate set of appropriation codes. (5.2.2)

3. The Secretariat should provide in its estimates for the external printing of large volume materials/examination papers. (5.2.4)

4. The Department allocate a block of Purchase Order numbers to the Secretariat. (5.2.6)
5. To reduce delays in international cables through departmental links to the Foreign Affairs Network, a telex machine OR direct access to DFA be provided. (5.2.10)

6. Photocopying lots of greater than 500 copies, or where large numbers of back to back copies are required, should be despatched to the departmental Printing Unit. Staff should pass lots of more than 40 copies to the Secretariat Registry for reproduction and collation. (5.2.12 and 5.2.13)

7. A forms design consultant investigate the feasibility of No Carbon Required (NCR) form usage throughout the Secretariat. (5.2.14 and 5.12.2)

8. Clerical Assistant, Grade 2, position number 6651 be filled as a priority action. (5.2.15 and 5.4.3)

9. Replacement of the present 7 year old photocopier be estimated for in the 1982/83 Office Machines Estimates. (5.2.16)

10. The Olivetti Word Processor should be modified/replaced to provide superior editing facilities and reduced processing turnaround. (5.3.1)

11. Reclassification of Typist Grade 2, position no 7423, to Word Processing Typist, Grade 1 should be completed as soon as possible (5.3.2)

Library

12. To enable the backlog in cataloguing to be overcome, daily services should cease for a half day, each day, and this period be devoted to cataloguing action. (5.5.8)

13. Project and Research Officers involved in the production of papers and publications, should perform their own proofreading and editing tasks. (5.5.10)

14. The part-time Library officer's position retained for a period of 12 months at a working week of 35 hours. A review of the position be made at the expiration of 12 months, to determine its part-time or full-time status. (5.5.13 (1))

15. The backlog of photocopying 35 consultant's reports to be contracted to an external agency. (5.5.13 (3))
16. In order to gain shelf space in the limited Library accommodation, the Librarian, at her discretion, should dispose of hardcopy references which are duplicated by microfiche. Such a practice should continue in the future as materials become dated. (5.5.15)

**Deputy Executive Director**

17. The Deputy Director, under direction, undertake the major portion of liaison and negotiation with DIBA. (5.6.4)

18. Duty Statement for position number 7178, Clerk Class 10, be amended to show the local designation as 'Deputy Director', in place of 'Principal Project Officer', to reflect the intent of the reclassification. (5.6.4)

**Project Team A**

19. In matters relating to the assessment of overseas qualifications, COPQ secretariat be consulted as to the consequences of altering procedures at overseas posts. (5.7.5)

20. In relation to the Technical Panel's Descriptive Statements, the Secretariat should investigate the feasibility of simplified statements or proforma certificates. (5.7.10)

**Project Team B**

21. The informal internal provision of opinion by the Generalist Group to other areas either be ceased or formalised to enhance management of the team's workload. (5.8.6)

22. The continuation of assistance to the Social Work panel be deferred until backlogs of casework are eliminated in other areas. (5.9.15)

**Project Group C**

23. Attention of overseas selection staff be drawn to their erroneous direction of prospective migrant architects and dieticians to contact the Secretariat directly instead of following approved procedure for assessment as laid down in the Migration Manual. (5.10.6 and 5.10.8)

24. Deferment of reactivation of the Expert Panel in Optometry should continue, until backlogs in other areas are eliminated. (5.10.9)
25. Staffing action be taken immediately to staff the vacant Senior Research Officer Grade 2 position No 7441 in Project Team C. (5.10.12)

26. Consideration be given to scaling down the work in Veterinary Science unless the 1982 examination can be developed and administered without further undue delay. (5.10.16)

27. The Committees Expert Panel in Computer Science urged to design a less complex assessment procedure for its casework. (5.10.23)

AMEC, AECOP Non Panel and Exams Unit

28. Approval be sought from the Council (AMEC) for engagement of a second registrar to assist with AMEC casework and administration, so that the class 8 may give more attention to AECOP and non panel matters. For similar reasons, engagement of a registrar, with the Minister's approval, to assist with the AECOP workload is recommended. (5.11.6 and 5.11.12)

29. Completion of application for assessment forms should be made in duplicate, or triplicate, according to procedures prepared by particular panels, in order to reduce the photocopying burden on secretariat staff. (5.12.2 and 5.2.14)

30. Discrepancies in the order of Worker Requisition Categories and Occupational Demand Schedule be brought to the notice of responsible officers in Central Office. (5.12.3)

31. 'Occupations in Australia' be regularly updated and explanatory notes be added for assessment and selection staff. (5.12.3)

Relationship between APS and Non APS staff

32. The effect of employing registrars should be taken into account during any review of the Secretariat's Public Service establishment. (6.1.4)

33. The matter of extending grants-in-aid to engage support staff be brought to the Committee's attention. (6.1.5)

Usage of Staff

34. Subject to other priority staffing mentioned in the report (recs 8 and 26) action be taken to provide permanent staff in those positions occupied by officers on indefinite temporary transfer, as illustrated in Appendix F. (6.2.12)
35. Further establishment review and action be undertaken in relation to the Clerk Class 6, position number 7419, on its relationship with the non panel assessment sub-section and the duties of committee Secretary. (6.2.12)

Introduction of ADP

36. The standardisation of index cards for item banks be completed. (6.3.9)

37. An approach to ACER be made for the standardisation of examination item analyses. (6.3.9)

38. A software package for examination item analysis be costed and purchased if appropriate. (6.3.9)

39. Secretariat staff liaise closely and continually with staff of the Statistics and Computer Services Section on the development of the Secretariats ADP requirements. (6.3.9)

40. The department provides a systems analyst to determine the feasibility of computerising relevant functions listed on the report and assist with the transfer of these functions to electronic storage. (6.3.9)

Pre Embarkation Briefings for Migrant Officers

41. Group briefings be preferred to individual briefings in providing information to migration officers before proceeding to their posts. (6.4.3)

42. Secretariat staff prepare a briefing booklet on COPQ methods and procedures for use by overseas selection staff, before and after relocation at the post. (6.4.3)

43. The Secretariat discuss the availability of COPQ publications with the Migration Officer as part of the briefing. (6.4.3)

44. The issue of 'Occupations In Australia' at briefings of Migration Officers. (6.4.6)

45. Undated versions of the various COPQ summaries of Acceptability of Professional Qualifications be provided as a screening device at further posts, as appropriate. (6.4.6)

Staff Development

46. Secretariat staff are encouraged and nominated to attend departmental or other staff development courses, workshop or interchange, where they are relevant to an officer's duties. (6.5.3)
General Recommendations

47. The Executive Director should advise the Committee that under current circumstances, to take on further panels or sub-committees, the Secretariat would be unable to adequately respond to the Committee's Terms of Reference. (6.2.12)

48. With the Committee's agreement all secretaries of panels should bring to the notice of panel members the need to restrict expansion of panel business by deferment of all new initiatives, in view of the incapacity of Secretariat staff to deal with additional workload.

49. Whenever practicable, the Secretariat should attempt to reduce the subjective component of assessments by developing an objective means of assessment, such as a numerical rating scale, which would have the effect of reducing assessment turnaround time. (6.6.3 and 4)
Polic' Changes

Following recommendations by the Council's Board of Examiners, the Council has made the following modifications to the rules governing its examinations:

Written Examination

a. If a candidate passes the written examination and fails the clinicals, he will not be required to re-sit the written examination.

   (If, however, a candidate fails in one section of the written test he must repeat both the English and professional components of the examination.)

b. A candidate may have three attempts at the written test.

Clinical Examination

a. A candidate may have three attempts at the clinical examination.

   (A candidate must, however, pass in each subject - Medicine, Surgery, and Obstetrics and Gynaecology - at the one examination session to be successful. There will be no supplementary examination in any subject. Candidates who fail in one subject must re-sit all three subjects.)

b. In future, the Board of Examiners may decide that candidates should, in certain circumstances, wait at least twelve months before sitting the clinical examinations again. During this time such candidates would be expected to undertake thorough revision in all clinical subjects.

The Chairman of the Board of Examiners will provide counselling to candidates who fail the examination.

October, 1982
<table>
<thead>
<tr>
<th>Abbreviation</th>
<th>Full Form</th>
</tr>
</thead>
<tbody>
<tr>
<td>ABS</td>
<td>Australian Bureau of Statistics</td>
</tr>
<tr>
<td>ACER</td>
<td>Australian Council for Educational Research</td>
</tr>
<tr>
<td>ACT</td>
<td>Australian Capital Territory</td>
</tr>
<tr>
<td>ACPEA</td>
<td>Australian Council on Population and Ethnic Affairs</td>
</tr>
<tr>
<td>ADA</td>
<td>Australian Dental Association</td>
</tr>
<tr>
<td>ADEC</td>
<td>Australian Dental Examining Council</td>
</tr>
<tr>
<td>AECOP</td>
<td>Australian Examining Council for Overseas Physiotherapists</td>
</tr>
<tr>
<td>AIMA</td>
<td>Australian Institute of Multicultural Affairs</td>
</tr>
<tr>
<td>AMA</td>
<td>Australian Medical Association</td>
</tr>
<tr>
<td>AMEC</td>
<td>Australian Medical Examining Council</td>
</tr>
<tr>
<td>AMEP</td>
<td>Adult Migrant Education Program</td>
</tr>
<tr>
<td>AMES</td>
<td>Adult Migrant Education Service</td>
</tr>
<tr>
<td>ANZRA</td>
<td>Australia-New Zealand Reciprocity Association (for licensing of plumbers)</td>
</tr>
<tr>
<td>APA</td>
<td>Australian Physiotherapy Association</td>
</tr>
<tr>
<td>ASA</td>
<td>Australian Society of Accountants</td>
</tr>
<tr>
<td>ASCO</td>
<td>Australian Standard Classification of Occupations</td>
</tr>
<tr>
<td>Acronym</td>
<td>Full Form</td>
</tr>
<tr>
<td>---------</td>
<td>-----------</td>
</tr>
<tr>
<td>ASEAS</td>
<td>Adult Secondary Education Assistance Scheme</td>
</tr>
<tr>
<td>ASLPR</td>
<td>Australian Second Language Proficiency Rating</td>
</tr>
<tr>
<td>AVCC</td>
<td>Australian Vice-Chancellors' Committee</td>
</tr>
<tr>
<td>CALFRIC</td>
<td>Committee for Allocation of Loans for Refugees from Indo-China</td>
</tr>
<tr>
<td>CES</td>
<td>Commonwealth Employment Service</td>
</tr>
<tr>
<td>COPQ</td>
<td>Committee (or Council) on Overseas Professional Qualifications</td>
</tr>
<tr>
<td>COSAC</td>
<td>Commonwealth/State Apprenticeship Committee</td>
</tr>
<tr>
<td>CTC</td>
<td>Central Trades Committee (under the Tradesmen's Rights Regulation Act)</td>
</tr>
<tr>
<td>DEIR</td>
<td>Department of Employment and Industrial Relations</td>
</tr>
<tr>
<td>DIEA</td>
<td>Department of Immigration and Ethnic Affairs</td>
</tr>
<tr>
<td>DOLAC</td>
<td>The Departments of Labour Advisory Council</td>
</tr>
<tr>
<td>ECFMG</td>
<td>Educational Commission for Foreign Medical Graduates (United States of America)</td>
</tr>
<tr>
<td>ESL</td>
<td>English as a Second Language</td>
</tr>
<tr>
<td>ESP</td>
<td>English for Special Purposes</td>
</tr>
<tr>
<td>FQC</td>
<td>Foreign Qualifications Committee</td>
</tr>
<tr>
<td>GDC</td>
<td>General Dental Council (of the United Kingdom)</td>
</tr>
<tr>
<td>GMC</td>
<td>General Medical Council (of the United Kingdom)</td>
</tr>
<tr>
<td>GTA</td>
<td>General Training Assistance</td>
</tr>
<tr>
<td>Acronym</td>
<td>Description</td>
</tr>
<tr>
<td>---------</td>
<td>-------------</td>
</tr>
<tr>
<td>IEA</td>
<td>The Institution of Engineers, Australia</td>
</tr>
<tr>
<td>LTC</td>
<td>Local Trades Committee (under the Tradesmen's Rights Regulation Act)</td>
</tr>
<tr>
<td>MCQ</td>
<td>Multiple Choice Questions</td>
</tr>
<tr>
<td>RALC</td>
<td>Regulatory Authorities Licensing Committee (for licensing of electricians)</td>
</tr>
<tr>
<td>SAA</td>
<td>Standards Association of Australia</td>
</tr>
<tr>
<td>TA</td>
<td>Technical Adviser</td>
</tr>
<tr>
<td>TEAS</td>
<td>Tertiary Education Assistance Scheme</td>
</tr>
<tr>
<td>TRCC</td>
<td>Trades Recognition Co-ordinating Committee</td>
</tr>
<tr>
<td>TRRA</td>
<td>Tradesmen's Rights Regulation Act</td>
</tr>
<tr>
<td>TAFE</td>
<td>Technical and Further Education</td>
</tr>
<tr>
<td>TAFEC</td>
<td>Technical and Further Education Council</td>
</tr>
</tbody>
</table>