



20 January 2023

Ms Maria Vamvakinou MP
Chair
Joint Standing Committee on Migration
PO Box 6021
Parliament House
Canberra ACT 2600

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Dear Ms Vamvakinou,

Migration: Pathway to Nation Building

The Association of Heads of Independent Schools of Australia (AHISA Ltd) appreciates the opportunity to contribute to the Standing Committee's inquiry into Australia's migration system. Our submission speaks to the engagement of Australian independent schools with Australia's current Temporary Skills Shortages (TSS) visa arrangements as they seek to recruit teachers, school leaders and other skilled staff from overseas.

AHISA has been advocating since 2017 for changes to the Australian Government's approach to determining skills shortages in relation to schooling-related occupations for the purposes of the TSS visa program. In 2017, changes to the then 457 visa arrangements and skilled occupations lists threatened tenure of principals of independent schools recruited from the United Kingdom and the staffing arrangements of independent schools in regional and remote areas.

Schools now face more intense teacher shortages nationally, in the context of a global 'talent war' for teachers amid a world-wide teacher shortage. Australia's temporary skilled visa arrangements must therefore be both fit for purpose and competitive.

On the following pages we present evidence gathered from member surveys to help describe the importance of overseas recruitment to independent schools, which we invite the Standing Committee to consider in its deliberations. We also make suggestions as to how TSS arrangements could better support overseas recruitment of staff for Australian schools.

I may be contacted on (02) 6247 7300 if you wish to discuss any elements of this submission.

Yours sincerely,

Dr Chris Duncan

AHISA Chief Executive Officer



ABOUT AHISA

AHISA Ltd is a professional association for Heads of independent schools.

The primary object of AHISA is to optimise the opportunity for the education and welfare of Australia's young people through the maintenance of collegiality and high standards of professional practice and conduct amongst its members.

AHISA's 460 members lead schools that collectively account for over 450,000 students, representing over 70 per cent of enrolments in Australia's independent schools and over 11 per cent of total Australian school enrolments. AHISA members' schools also account for 20 per cent of Australia's Year 12 student enrolments.

AHISA's members lead a collective workforce of over 45,000 teaching staff and some 30,000 support staff.

The socio-economic profile of AHISA members' schools is diverse. Over 20 per cent of our members lead schools serving low- to very low-SES communities.

Some 86 per cent of AHISA members' schools provide primary years of schooling as well as secondary schooling and over 70 per cent also offer early childhood education. Almost a third of AHISA's members lead schools with boarding provision.

AHISA believes that a high quality schooling system in Australia depends on:

- Parents having the freedom to exercise their rights and responsibilities in regard to the education of their children
- Students and their families having the freedom to choose among diverse schooling options
- Schools having the autonomy to exercise educational leadership as they respond to the emerging needs of their communities in a rapidly changing society.

KEY POINTS

- Many independent schools provide educational or student residential programs requiring specialist staff or staff with experience in specialist areas, at all schooling levels.
- Overseas recruitment is valued as a means to address shortages of experienced teachers and shortages of boarding house staff in independent schools, particularly those in outer regional, remote, and very remote locations.
- Teacher recruitment issues have become more complex as Australia's teacher shortage deepens and nations whose teaching training systems are similar to our own look to Australian teachers to address their own teacher shortages. Consideration should be given to accounting for a wider, international context when developing teacher workforce projections for Australia.
- The instability of the visa status of occupations in the education sector is concerning and undermines long-term human resource planning and therefore course offerings in schools.

RECOMMENDATION

AHISA recommends that consideration be given to designating all school-related occupations as having MLTSSL (Medium and Long-term Strategic Skills List) status by default, to:

- Overcome the issue of broad-based employment data hiding specialist staff needs or needs determined by the geolocation of schools
- Give schools and school systems greater certainty in workforce planning and greater flexibility to adapt to unforeseen circumstances such as the COVID-19 pandemic
- Give schools and school systems greater capacity to engage in innovative ventures or education provision.
- Make Australia more competitive in the global talent war for teachers.

1. THE VALUE OF OVERSEAS RECRUITMENT TO AUSTRALIAN INDEPENDENT SCHOOLS

The opportunity to recruit staff overseas is critically important for Australian independent schools:

- For leadership positions, it helps attract a broad pool of appropriately qualified and experienced applicants. The opportunity to widen the pool of applicants for principal/senior leadership roles is appreciated by independent schools, even if the final appointee is Australian.
- It may be the only opportunity for independent schools to attract applicants with specialised experience, especially those staff who have worked in:
 - International schools
 - Schools offering international curricula such as the Montessori, Waldorf, International Baccalaureate or Cambridge International Examinations programs
 - Schools with affiliations to international co-curricular program associations or groups, such as Round Square (outdoor education)
 - Schools with a focus on internationalism
 - Schools with boarding facilities.
- It may be the best opportunity to attract specialist staff to schools in regional or remote locations. Non-systemic schools do not have the ability to offer guaranteed postings to major metropolitan areas as an inducement for staff to apply for initial postings in hard-to-staff areas.
- It supports global mobility in the education sector, which enriches professional exchange and innovation in practice.
- Overseas appointments may be essential for independent schools wishing to engage in innovative, global ventures.

1a. The independent sector's engagement in overseas recruitment is broad

AHISA's 2017 member survey on the impact of 457 visa changes¹ revealed that, in the 10 years prior to the survey, 53 per cent of respondents' schools had recruited staff under temporary visa arrangements.

Further, some 53 per cent of respondents to AHISA's survey reported that, in the 15 years prior to the survey, their school had conducted international searches for principals or senior leaders.

Member surveys undertaken by AHISA in 2017 for its submission to the Independent Review into Regional, Rural and Remote Education² revealed that overseas recruitment is the most common solution to address shortages of experienced teachers at all schooling levels and shortages of boarding house staff in independent schools in outer regional, remote, and very remote locations.

1b. Positions filled under temporary work visa arrangements, 2017

AHISA's 2017 member survey on 457 visa changes found that, as well as several overseas appointees to the principal's role, overseas staff members with the following capacities or



curriculum/subject expertise were at that time employed by members' schools under 457 visa arrangements (the precursor to Temporary Skill Shortage, or TSS, visas):

- Heads/Directors of Learning or Learning Innovation or Social Emotional Learning
- Business Manager
- Teachers in recognised difficult-to-staff areas, including native speaking teachers for Languages Other Than English (LOTE) subjects, teachers of Mathematics, Chemistry, Physics, Latin and Music, and teachers of Special Education
- Staff with experience in international schools
- Leaders of International Baccalaureate (IB) programs (primary, middle years and senior secondary) and teachers in all IB subject areas
- Religious Studies teachers and ministers/pastors/rabbis or others with specialist religious qualifications
- Boarding Supervisors and Heads of Boarding.

2. CHALLENGES IN RECRUITING TEACHING/ACADEMIC STAFF, AS REPORTED BY INDEPENDENT SCHOOLS

2a. Staffing challenges across the independent sector

While many of the appointments described above in Section 1b reflect the diversity of provision in independent schools and their operational structures, some teaching positions filled through overseas recruitment reflect commonly reported shortages across all sectors.

In 2020, AHISA conducted the first of an intended biennial survey covering staff recruitment and retention in members' schools.³ Data collected in the 2020 survey related to 2019 (that is, pre-COVID). In 2022, to collect data relating to 2021, an expanded survey was conducted in collaboration with education consultancy MMG Education, with the aim of capturing some of the effects of the pandemic on staffing arrangements in independent schools.

While responses to both surveys demonstrated that staffing issues in independent schools are not necessarily uniformly experienced – they can be heavily dependent on the school's location, its size, range of year-level offerings, any curriculum specialisms and the demographic profile of its workforce, for example – responses revealed common and persistent issues. Chief among these is the difficulty of recruiting qualified and/or experienced secondary teachers for subject areas such as Mathematics, Physics and Chemistry.

Nationally, the teaching positions most often reported as hardest to fill in 2021, in order of the proportion respondents selecting the option, were Mathematics, Physics, Design & Technology and Chemistry. (The measure of difficulty in recruiting such positions varied by state and territory.) A comparison of data for 2019 and 2021 shows that, in 2021, there was a significant increase in difficulty recruiting teachers of Design & Technology, special education, English and religious education. (See Table 1 below.)

Table 1. AHISA STAFF RECRUITMENT & RETENTION SURVEYS

Hard to staff teaching positions 2019 and 2021, by proportion of respondents selecting each option

SUBJECT AREA	2019	2021
Mathematics	67%	67%
Physics	61%	55%
Design & Technology	33%	42%
Chemistry	36%	34%
Languages other than English	34%	32%
Education support/Special needs	16%	23%
English	13%	21%
Religious education	4%	20%
Engineering	10%	12%
Senior secondary extenders in any subject area	7%	10%



The 2021 survey data indicated that shortages of teaching/academic staff with required specialist/discipline knowledge were the greatest recruitment challenge for respondents' schools (mentioned by 92% of respondents), further challenges were shortages of teachers with the required experience (mentioned by 57% of respondents) and shortages teachers who shared the values and beliefs of the school (mentioned by 23% of respondents). This finding is consistent with the survey data for 2019.

2c. Staff recruitment is a particular challenge for independent schools in regional and remote geolocations

While staff recruitment is a challenge for AHISA members' schools in all geolocations, AHISA surveys undertaken in 2017 for the Independent Review into Regional, Rural and Remote Education (IRRRRE) identified difficulties in teacher recruitment as the factor having the greatest negative impact on educational provision for schools outside of major city geolocations (see Table 2, below).

Table 2: AHISA 2017 IRRRRE MEMBER SURVEY

Top mentioned factors having a negative impact on schools' educational provision in regional and remote areas

INNER REGIONAL	OUTER REGIONAL	REMOTE	VERY REMOTE
Difficulties in teacher recruitment	Difficulties in teacher recruitment	Difficulties in teacher recruitment	Difficulties in teacher recruitment
Depressed local economic conditions	Depressed local economic conditions	Depressed local economic conditions	Costs or levels of resourcing (that may have an impact on subject offerings, access to subjects via distance education or other providers)
Costs or levels of resourcing (that may have an impact on subject offerings, access to subjects via distance education or other providers)	Costs or levels of resourcing (that may have an impact on subject offerings, access to subjects via distance education or other providers)	Limited or no access to ancillary services such as occupational therapy or speech therapy	Limited or no access to ancillary services such as occupational therapy or speech therapy
Limited or no access to government-subsidised student transport	Cost of staff	Limited or no access to mental health services	Limited or no access to mental health services
Limited capacity for fundraising	Limited capacity for fundraising	Limited capacity for fundraising	Insufficient broadband width (eg for video conferencing)
Difficulties accessing teaching relief staff	Difficulty accessing relevant PD for teaching or teaching support staff	Limited subject offerings	Intermittent or unreliable internet access

As already noted in Section 1, independent schools in regional and remote areas do not have the same capacity as systems to offer inducements to teachers or Principals to take up rural and remote appointments. Independent schools in outer regional, remote, and very remote locations (or in other locations which experience teacher recruitment challenges, such as Darwin) are therefore more likely to report that they rely on overseas recruitment to address shortages of experienced teachers at all schooling levels, including in primary provision, and to address shortages of boarding house staff. As one respondent commented:



“Teachers on certain visa types from overseas have to live and work in regional areas. This has proved very helpful for recruitment, particularly in the Primary School.”

2d. Recruitment issues are intensifying for all Australian schools

An increase in Australia’s school-aged population allied to a projected shortfall in teacher workforce growth⁴ and COVID-related factors influencing Australia’s teacher workforce have intensified staff recruitment and retention issues for all Australian schools, including independent schools.

Predictions of a global teacher shortage⁵, in addition to projected teacher shortages in the United Kingdom⁶, Canada and the United States⁷ and New Zealand⁸ – whose teacher training systems are similar to Australia’s and therefore a target for overseas recruitment – suggest the international context must be taken account of in decisions on eligible occupations for TSS visas. If Australia is to brace for a war for teaching talent with nations whose teaching training systems are similar to our own, schools must be supported, not penalised by visa arrangements.

3. BARRIERS TO OVERSEAS RECRUITMENT OF TEACHING/ACADEMIC STAFF

3a. Determinations of skills shortages do not account for variation in provider need

Determinations of skills shortages based on broad national, state- or territory-based data do not adequately capture the needs of independent schools, or the needs of large school systems with schools in regional and remote areas. For example, the 2019 national occupational cluster report for School Teachers⁹ reported that ‘Many employers noted difficulty in attracting applicants to regional areas, and in recruiting specialist primary and secondary school teachers’. The report concluded, however, that ‘No shortages of primary school teachers or secondary school teachers were evident in any states or territories in 2019’.

Even when occupations are determined to be in shortage, there may be a change in the status of the occupation for visa applications. For example, the 2022 Skills Priority List¹⁰ currently notes moderate shortages for both primary and secondary teachers nationally and in all states and territories, yet the occupation Primary School Teacher (ANZSCO 241213) remains on the Short Term Skill Occupation List (STSOL).¹¹

The 2022 Skills Priority List records no shortage of the occupation Middle School Teacher (ANZSCO 241311), except for a moderate shortage reported for the Northern Territory. The continuing determination of Middle School Teacher as STSOL is problematic for independent schools. It is common for Australian independent schools to look overseas to recruit teachers with International Baccalaureate training and experience, or training in specialist pedagogies such as the Waldorf and Montessori methods. These specialisms apply to primary and middle years provision as much as to senior secondary programs.

AHISA recognises that projecting shortages in Australia’s school workforce is complex, particularly given supply and demand differences across major city, regional and remote areas. It is vital, however, that there be sufficient flexibility in immigration approaches to accommodate the range of provider needs and to respond to rapidly changing workforce conditions.

Immigration policies must also allow for strategic recruitment for projected shortages or to support innovative changes in education provision. This has become increasingly important since disruption of schooling by the COVID-19 pandemic and its acceleration of the transformation of Australia’s schooling system, especially in digital delivery.

3b. Visa status determinations require stability as well as flexibility

The instability of the visa status of occupations in the education sector is concerning and undermines long-term human resource planning and therefore course offerings in schools.

AHISA’s 2017 member survey revealed that, given the reliance of independent schools – particularly those in outer regional, remote, and very remote locations – on overseas recruitment to address staff shortages in specialist curriculum areas or for student residential support, the announced changes to 457 visa arrangements had a broadly negative impact on the sector. The shift of key occupations in the schooling sector from MLTSSL to STSOL status not only affected planning for regular education provision but also affected some schools’ strategic developments. Examples given by respondents to AHISA’s survey included a planned expansion of IB provision in one case, the development of online curricula in another and, in a third case, a proposed parallel training venture with overseas partners.



Since 2017, while the eventual return of the occupation 'Chief Executive or Managing Director' to MLTSSL status helped mitigate immediate visa renewal issues of some AHISA members who had been appointed to their Australian position under 457 visa arrangements, anecdotal evidence available to AHISA indicates this has not resolved the impact of the occupation 'School Principal' (134311) remaining at STSOL status. Schools are now reluctant to broaden their candidate pool for principals or senior leaders (who may have no teaching load) to those without Australian residential status, and therefore risk failing to identify candidates with the required specialist knowledge or experience.

Senior school leadership positions such as Director of Teaching and Learning, Director of Research and Innovation, Director of Curriculum, Director of Learning Analytics, Director of Wellbeing, Head/Deputy Head of Senior School, Head/Deputy Head of Junior School, Head/Deputy Head of Middle School and Head of Boarding do not always carry a teaching load. Often the more appropriate occupation classifications for non-principal senior leadership positions in schools could be 'Education Managers' (134499), 'Specialist Managers' (139999) or 'Education Adviser' (249111); these occupations, however, are listed as short-term occupations (STSOL). Even if such positions were to include a teaching load, the occupations 'Primary School Teacher' (241213) and 'Middle School Teacher' (241311) are also designated as STSOL. Only 'Secondary School Teacher' (241411) remains listed as MLTSSL.

4. POSSIBLE REFORM DIRECTIONS

There are significant factors that make the school education sector a viable prospect for more flexible immigration arrangements:

- Nearly all staff positions for which independent schools seek overseas recruits are classified as Skills Level 1 occupations
- Teaching and executive level leadership positions in schools attract salaries well above the current minimum for TSS visa eligibility
- While the qualifications of teachers from New Zealand are automatically recognised, the credentials, experience and English language proficiency of teachers from other countries must be approved by the Australian Institute for Teaching and Leadership (AITSL)
- All overseas teachers must in addition meet the teacher registration requirements of the state or territory where they will be employed
- Overseas recruitment comes with a significant cost and red tape burden that acts as a barrier to overlooking possible Australian-based recruits.

These factors may explain why, until recent critical teacher shortages emerged, overseas teacher recruitment has been very moderate in one of Australia's largest employment sectors, especially for primary teachers.

In such an already highly regulated sector, consideration should be given to designating all school-related occupations as having MLTSSL status by default. This would:

- Overcome the issue of broad-based employment data hiding specialist staff needs or needs determined by the geolocation of schools
- Give schools and school systems greater certainty in workforce planning and greater flexibility to adapt to unforeseen circumstances such as the COVID-19 pandemic
- Give schools and school systems greater capacity to engage in innovative ventures or education provision.

Assured MLTSSL status, with the possibility of four-year visas and the potential for visa renewal and a pathway to permanent residency, would have the added benefit of making Australia more competitive in the global talent war for teachers. ■

NOTES

¹ AHISA's 2017 member survey on the impact of 457 visa changes was fully reported in a June 2017 submission to the then Department of Immigration and Border Protection and is available on request.

² The results of AHISA member surveys undertaken for AHISA's submission to the Independent Review into Regional, Rural and Remote Education are reported in that submission:
https://www.ahisa.edu.au/AHISA/Advocacy/Submission_Resources/Submissions_2017/Independent_Review_into_Regional_Rural_and_Remote_Education_28_August_2017.aspx.

³ AHISA's Staff Recruitment & Retention reports are available only to AHISA members.

⁴ AITSL (2022) Latest data reinforce teacher workforce pressures. AITSL media release, 22 September 2022. Accessed at <https://www.aitsl.edu.au/secondary/news-and-media/media-release---latest-data-reinforce-teacher-workforce-pressures>.

⁵ UNESCO (2022) World Teachers' Day: UNESCO sounds the alarm on the global teacher shortage crisis. UNESCO media release, 4 October 2022. Accessed at <https://www.unesco.org/en/articles/world-teachers-day-unesco-sounds-alarm-global-teacher-shortage-crisis>.

⁶ Worth, J & Faulkner-Ellis, H (2022) 2022 Teacher Labour Market in England Annual Report. National Foundation for Educational Research. Accessed at <https://www.nfer.ac.uk/teacher-labour-market-in-england-annual-report-2022>.

⁷ Welch, A (2022) Teacher shortages are a global problem – 'prioritising' Australian visas won't solve ours. *The Conversation*, 31 August 2022. Accessed at <https://theconversation.com/teacher-shortages-are-a-global-problem-prioritising-australian-visas-wont-solve-ours-189468>.

⁸ Clarke, R (2022) Can \$24m and 1000 additional teachers fix this staffing crisis? *School News New Zealand*, 19 September 2022. Accessed at <https://www.schoolnews.co.nz/2022/09/can-24m-fix-the-teacher-shortage/>.

⁹ Originally accessed at <https://docs.employment.gov.au/documents/school-teachers-australia>. URL no longer valid.

¹⁰ Accessed at <https://www.nationalskillscommission.gov.au/topics/skills-priority-list>.

¹¹ Accessed at <https://immi.homeaffairs.gov.au/visas/working-in-australia/skill-occupation-list>.