

10 December 2025

Our ref: HS/ML

Dr James Popple
Chief Executive Officer
Law Council of Australia
PO Box 5350, Braddon ACT 2612

By email: [REDACTED]

Dear Dr Popple

Inquiry into the Value of Skilled Migration to Australia

Thank you for the opportunity to provide feedback on the Joint Standing Committee on Migration's inquiry into the value of skilled migration to Australia. The Queensland Law Society (QLS) appreciates being consulted on this important inquiry.

This response has been compiled by the QLS Migration Law Consulting Committee, whose members have substantial expertise in this area. Our comments relate to the difficulties experienced by skilled migrants and their legal representatives in working with the migration system.

Primarily, our members note that there are difficulties communicating with the Department of Home Affairs in relation to applications for visas. Communication from the department has become less frequent and less helpful in relation to skilled and training visa applications and 407 training visas, in particular, are subject to inordinate delays. This appears to relate to an influx of new staff who do not appear to have received the same training as previous case managers.

The impact of suboptimal training and processes is also seen in lack of consistency between decisions. For example, in the employer-sponsored space there are inconsistencies between decisions relating to the same industries and similar roles. There is also a lack of issuing requests for further information, which is unfair on users and likely contributing to inconsistency in decision making.

Improved training in relation to how to consider evidence and when to request further information may be one way to improve the standard of decisions, as would publishing more specific and clear instructions about how decisions are to be made, as there appears to be gaps in published policy.

Once a decision is made, there are difficulties if the applicant contends that the decision has been infected by jurisdictional error, with reviews taking 6 to 8 months and litigation for judicial review having its own risks and considerations.

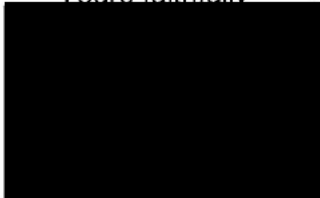
Inquiry into the Value of Skilled Migration to Australia

Apart from considering issues with the way in which visa applications are managed by the Department, QLS considers it important to consider other aspects of the skilled migration ecosystem impacting on Australia's ability to attract and retain the necessary workforce in key industries.

For example, QLS has been made aware in respect of internationally trained registered nurses that the streamlined registration process announced by Australian Health Practitioners Regulation Agency in January 2025 has not been implemented as intended.¹ The streamlined process was supposed to allow qualified and experienced registered nurses from comparable jurisdictions to become registered in Australia without completing an additional examination but has been applied only to nurses who qualified after 1 January 2017, meaning that more experienced nurses are being put to the significant expense of visiting Australia to take an exam before they can be registered and obtain employment and a visa.

If you have any queries regarding the contents of this letter, please do not hesitate to contact our Legal Policy team via policy@qls.com.au or by phone on [REDACTED] [REDACTED].

Yours faithfully



Genevieve Dee
President

¹ [Streamlined pathway to registration for internationally qualified registered nurses](https://www.ahpra.gov.au/News/2025-01-27-media-release-IQRN.aspx) <<https://www.ahpra.gov.au/News/2025-01-27-media-release-IQRN.aspx>> and https://www.ahpra.gov.au/documents/default.aspx?record=WD25%2f34535&dbid=AP&checksum=g%2fcnXo43y6g1kn8EbqUITg%3d%3d&gl=1*tv94x4*ga*MTc1OTIyNzk1OS4xNzY0NjQxNiI0*ga_F1G6LRCHZB*czE3NjQ2NDE2MjMkbzEkZzEkdDE3NjQ2NDE3NTQkaiYwJGwwJGgw