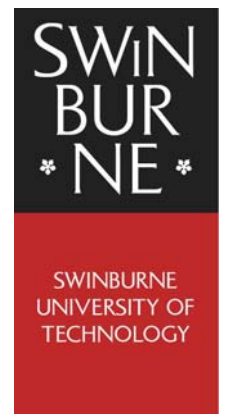


14 September 2017

Mr David Wilden
First Assistant Secretary
Immigration and Citizenship Policy
Department of Immigration and Border Protection
6 Chan Street
BELCONNEN, ACT, 2617



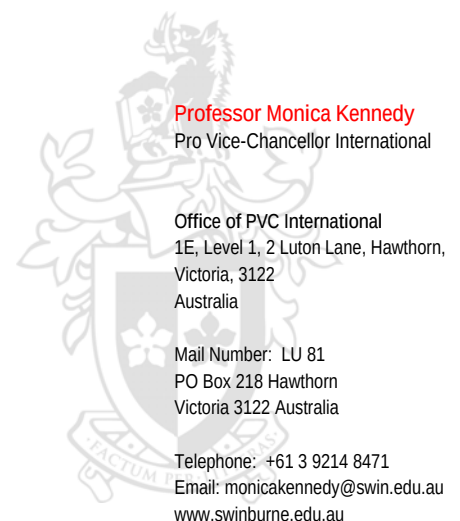
Dear Mr Wilden

**Swinburne University of Technology's submission to the
Department of Immigration and Border Patrol visa
simplification discussion paper**

Thank you for the opportunity to make a submission to the Department of Immigration and Border Patrol (DIBP) visa simplification discussion paper. As a dual-sector university with a significant cohort of international students, Swinburne University considers the matters raised in DIBPs paper to be of vital importance to the students that we serve.

Swinburne understands that economic and social objectives must be balanced against national security concerns. We consider that a key objective of any visa system reform should be the encouragement of a knowledge economy, and the facilitation of movement of skilled people. Transparency and accessibility are also vital to ensure a fair and effective visa system.

Higher education, perhaps more than any other industry in Australia, employs a workforce that is truly global. Policy reform should ensure that there are not unnecessary barriers to the movement of academic staff between countries.



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Scope for reduction in the number of visas

Swinburne is supportive of the Government's intent to achieve greater efficiencies in Australia's visa system where it is possible and practicable to do so. In principle, the proposal to reduce the number of visa classes from 99 seems eminently sensible, although Swinburne notes that in recent years streamlining of visas has not necessarily reduced the complexities associated with individual visa types, but has, in certain cases, simply grouped them together.

If the proposed reduction in visas is not coupled with a reduction or otherwise simplification of entry criteria, it is difficult to imagine that faster processing times would be achieved. Swinburne therefore recommends that any reduction in number of visas should be undertaken solely to reduce duplication, and should not come at the cost of diluting existing, objective criteria.

Delineation of temporary entry and long-term/permanent residence visas

As recently communicated to the Office of the Minister for Immigration and Border Protection, Swinburne was concerned by changes announced to the 457 visa scheme which directly impacted upon our academic workforce, changes that we are grateful have now been largely reversed.

While short term visas may provide a solution to acute and temporary labour market shortages, skilled migrants should not be deterred, by obstacles either intended or unintended, from pursuing permanent residency.

International recruitment of the highest performers is only possible with the appropriate incentives and opportunities beyond a fixed term visa. Temporary visas run the gamut from genuinely short term visitors to skilled worker visas which allow for four or eight years, granting permanent residence and citizenship opportunities to holders. While temporary visa holders do not have an automatic right to permanent residence, certain pathways from temporary to permanent residence exist within the visa system, including the 457 class, which should not be removed for the sake of clearer delineation.

Ensuring that our visa system supports Australia as a competitive and attractive destination for temporary and longer term entrants

In the context of higher education, the Australian university sector participates in the fiercely competitive international education marketplace. In order for our universities to develop and maintain world class reputations, we must be equipped with high performing academic workforces. While there is undeniably significant local talent that we can and do utilise, we must nevertheless also have access to the top talents on offer from other nations.

Provisional residence requirements, heavy use of short-term visas and shaky pathways to permanent residency and citizenship can potentially place this recruitment effort and the attractiveness of Australia as a destination of choice for skilled migrants at risk.

Further, while Swinburne is pleased with many of the reforms to student visas made possible by the Simplified Student Visa Framework, we believe there is scope for a more effective whole of Government approach with respect to the calculation and application of risk ratings for international students.

Swinburne is proud to invest in fostering high-quality research collaboration and knowledge exchanges with international institutional partners. This includes supporting and sponsoring research students and scholars to come to Swinburne on a temporary basis to participate in research activities and projects.

While Swinburne is pleased to assist with the Government's stated intention of capacity building in certain 'high-risk' nations, we strongly believe that we should not be punished by way of an inflated risk rating for doing so. We therefore request consideration of a modified risk rating system which takes into account explanatory risk factors and balances conflicting priorities.

Thank you for your consideration of our submission. I would be pleased to discuss these matters further with you.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Monica Kennedy', with a stylized flourish at the end.

Professor Monica Kennedy
Pro Vice-Chancellor International