

Bupa submission: Review of Regional Migration Settings



Bupa welcomes the opportunity to make a submission to the Department of Home Affairs' review of regional migration settings.

As an aged care provider with 58 homes across four states, with over 7000 team members caring for more than 5000 aged care residents, Bupa is one of the largest residential aged care providers in Australia. With 24 of our 58 homes located outside capital cities, we are also the largest provider in regional areas.

Australia's migration program plays a critical role in the aged care sector, and the most recent Census data shows that over 40 per cent of Registered Nurses and Personal Care Workers in the broader care and support sector are born overseas¹. At Bupa, almost half of our aged care team are current visa holders, using a range of pathways including skilled, graduate, and student visa subclasses.

The aged care sector is continuing to experience widespread workforce shortages, particularly in regional areas, and demand for care is increasing amid an ageing population. Under current settings, Australia is missing out on hundreds or even thousands of potential migrant nurses and carers to other countries with more attractive migrant pathways.

We believe that regional migration settings should be recalibrated to help attract the workforce needed to provide essential services, such as health and aged care, across all regions in Australia.

Should you have any further inquiries regarding Bupa's submission, please contact Tim Janczuk, Public Affairs Manager, on timothy.janczuk@bupa.com.au or 0401 169 826.

Summary of Bupa's recommendations

Recommendation 1: Prioritise permanent migration pathways and places for registered nurses and carers to alleviate significant workforce shortages in the aged care sector, especially in regional areas.

Recommendation 2a: Let Internationally Qualified Nurses (IQNs) work while awaiting AHPRA accreditation, enabling them to work at a limited scope (as PCW) until receiving AHPRA registration.

Recommendation 2b: Alternatively, create a specific Health and Care Stream under the 407-visa subclass

Recommendation 3: Allow IQNs to sit the Objective Structure Clinical Exam overseas to speed up the application process and reduce up-front costs for potential migrant nurses.

¹ [A caring nation – 15 per cent of Australia's workforce in Health Care and Social Assistance industry | Australian Bureau of Statistics \(abs.gov.au\)](https://www.abs.gov.au/australian-bureau-of-statistics)

Recommendation 4: Ensure Registered Nurses are given top priority to avoid adverse impacts to the health and aged care sectors under the planned decrease of Skilled Independent visas granted.

Recommendation 5: Establish a streamlined “Essential Skills Visa” as recommended by CEDA, for areas of critical need such as health and aged care, prioritising regional areas.

Recommendation 6a: Include Personal Care Worker (ANZSCO 243313) in the *Medium and Long-Term Strategic Skills List* and *Regional Occupation List* to provide more effective avenues to hiring carers in the aged care sector, particularly for regional areas.

Recommendation 6b: Alternatively, adopt a standardised approach to DAMAs that includes Personal Care Workers as a standard feature of streamlined DAMA agreements.

Recommendation 7: Develop new Temporary Graduate visa streams with a fast-track pathway to permanent residency to incentivise Student and Temporary Graduate visa holders to relocate to regional areas after the completion of their studies.

Recommendation 8: Establish a whole of government approach to deliver new, affordable housing and work with the aged care sector to identify and prioritise key regional areas to support the development of housing for workers.

Prioritising essential workers in the care and support sectors

The aged care sector is continuing to experience severe workforce pressures, especially in regional Australia. Increasingly, this means some older Australians may not be able to access residential care when they need it. At Bupa, we have felt these workforce pressures most acutely in regional areas, despite our best recruitment and retention efforts, leaving us with vacancies across many roles.

The workforce shortages leave some providers with no choice but to reduce the number of available beds, which has a particularly detrimental impact on older Australians in regional communities. Bupa has been forced to decline or delay the admission of new residents in some of our homes due to workforce constraints, despite available rooms.

This can be disruptive for older Australians and their families, who require suitable care in their local communities. Reduced occupancy also impacts the financial viability of providers, with the aged care sector having accumulated significant recurring losses in recent years and jeopardising the much-needed growth in the sector to care for an ageing population. Delayed admission to aged care also has overflow impacts, exacerbating the bed-block challenges experienced by public hospitals, as outlined by NSW Health². It is not sustainable for the health system to act as a care provider of last resort and older Australians should not be stuck in limbo in an unsuitable care environment.

Recent modelling by the Department of Health and Aged Care confirms a shortfall of 17,437 direct care workers³ as at mid-2023. High attrition rates have also been noted by organisations such as the

² NSW Health, [NSW Special Commission of Inquiry into Healthcare Funding submission](#), November 2023

³ Commonwealth, [Work Value Case submission](#), October 2023

Committee for Economic Development of Australia (CEDA), which have modelled an annual shortfall of 30,000 to 35,000 workers over the coming decade⁴. Further increases to mandated care minutes in October 2024 will add to these workforce pressures.

Australia's migration system must prioritise essential workers in the care and support sectors and create attractive pathways to permanent residency, particularly in regional areas. A strong migrant workforce is critical so older Australians are able to access aged care whenever and wherever they need it.

Recommendation 1: Prioritise migration pathways and places for registered nurses and carers to alleviate significant workforce shortages in the aged care sector, especially in regional areas.

Streamlining visa pathways for Nurses

Australia's migration system is no longer competitive with leading international counterparts, such as England or Canada. We have quickly fallen behind these countries, which offer a far better migrant experience and more attractive proposition to overseas workers. Migration system reform must remain a priority for the current government and inform the Department's considerations as it implements the Migration Strategy. There are several opportunities to improve migrants' experience when coming to Australia, both for regional-specific and general visa pathways.

Overseas nurses and carers seeking to work in Australia face several barriers, with the aged care sector missing out on hundreds or thousands of potential workers. Other countries such as the UK offer fast-tracked, streamlined visa options with more attractive pathways to permanent residency. For example, Internationally Qualified Nurses (IQNs) can get a UK visa at less than half the cost and be working in less than half the time it would take in Australia.

This has a material impact for potential candidates – we estimate that a nurse in the Philippines would need to work an additional 12 months at home simply to cover the up-front costs of migrating to Australia, without a guaranteed visa at the end of the process. Our migration partners indicate that many potential candidates are choosing to move to the UK instead of Australia due to these material differences.

Migration pathways need to be simplified to make Australia's system internationally competitive, and enable us to attract the best talent. The *Independent Review of Health Practitioner Regulatory Settings* identifies a range of issues facing internationally qualified nurses in its Final Report, and makes several recommendations to improve the visa system and registration process with AHPRA⁵.

The current process for IQNs is far too costly and time consuming, without the guarantee of a successful outcome. Applicants seeking to work in Australia are required to:

⁴ CEDA, [Duty of Care, Aged Care sector in crisis](#), June 2022

⁵ [Final Report](#), *Independent Review of Overseas Health Practitioner Regulatory Settings*, August 2023

1. Complete a NCLEX (computer-based examination) and register as an IQN
2. Book an Objective Structured Clinical Exam (OSCE) and apply for a visitor visa (without working rights) – note that some visa applications are rejected even with an invitation from AHPRA to sit the OSCE. -
3. Travel to Adelaide to sit the OSCE exam in person
4. Return to their home country while awaiting results
5. Wait to confirm AHPRA nursing registration and apply for a working visa

In contrast, an applicant to the UK can obtain a streamlined visa at far lower expense, in a shorter time, and without significant travel and opportunity costs. This visa allows an IQN to begin work immediately within a limited scope, and subsequently sit the OSCE to obtain their nursing registration.

We are also concerned about the proposed reductions to Skilled Independent visas as proposed in the Migration Program planning levels for 2024-25⁶. The intake of Registered Nurses coming to Australia is likely under the changes, with the 30,375 planned entrants across all professions in 2023-24 falling to 16,900 in the current financial year. It is critical that Registered Nurses are given top priority under this reduced intake to avoid a loss of potential candidates to work in essential sectors such as health and aged care.

There are several options to overcome these barriers and enhance the migrant experience for IQNs. Options to streamline the migration system include:

Recommendation 2a: Let Internationally Qualified Nurses (IQNs) work while awaiting AHPRA accreditation, enabling them to work at a limited scope (PCW) until receiving registration.

Recommendation 2b: Alternatively, create a specific Health and Care Stream under the 407-visa subclass

Recommendation 3: Allow IQNs to sit the OSCE exam overseas to speed up the application process and reduce up-front costs for potential migrant nurses.

Recommendation 4: Ensure Registered Nurses are given top priority to avoid adverse impacts to the health and aged care sectors under the planned decrease of Skilled Independent visas granted.

Removing barriers to recruiting personal care workers

New or improved permanent migration pathways are also needed for carers, as the current migration system is overly restrictive, limiting the recruitment of carers from overseas. Visa pathways need to be expanded to include carer roles, which must be prioritised to meet essential skills needs.

⁶ [Migration Program Planning Levels](#), Department of Home Affairs, May 2024.

The sector's initial experience with the *Aged Care Industry Labour Agreement* (ACILA) indicates the much-needed expansion of the care workforce is yet to be delivered, and there are no alternative pathways available, even to organisations operating in regional locations.

In contrast, New Zealand's *Care Workforce Work to Residence Visa* offers applicants a path to permanent residency if they work in aged care for at least twelve months. In the UK, the *Health and Care Worker Visa* also offers a streamlined pathway to applicants, with a 5-year visa usually approved within 3 weeks, and the option to apply for permanent residency after this period.

An ideal solution should be modelled on CEDA's recommendation for an *Essential Skills Visa*, providing a fast-tracked, streamlined visa pathway for areas of critical need such as health and aged care which are experiencing severe workforce shortages and will experience ongoing increases in demand for staff.

A secondary solution could be to make adjustments to existing regional skilled migration pathways to alleviate critical workforce shortages in these locations. This could include changes to relevant Skilled Occupation Lists to enable recruitment of carers (Personal Care Workers – ANZSCO 423313) under existing migration pathways. The inclusion of PCWs in the *Medium and Long-Term Strategic Skills List* and *Regional Occupation List* would provide important recruitment options across the sector or specifically to aged care providers operating in regional areas.

Another way to support the recruitment of carers to regional Australia would be through expanded use of the DAMAs with carers prioritised across all regions, as aged care workforce pressure are widespread across all regional areas. A standardised approach that includes the Personal Care Worker role as a standard feature of DAMAs would streamline and simplify this system for providers and could also be used to support an individual's employment mobility across different regional locations.

This would help the aged care sector alleviate the effect of severe sector-wide shortages, particularly in regional homes, increasing the capacity of these homes to provide care to their local communities and support the effective operation of the healthcare system.

Recommendation 5: Establish a streamlined "Essential Skills Visa" as recommended by CEDA for areas of critical need such as health and aged care, prioritising regional areas.

Recommendation 6a: Include Personal Care Worker (ANZSCO 243313) in the *Medium and Long-Term Strategic Skills List* and *Regional Occupation List* to provide more effective avenues to hiring carers in the aged care sector, particularly for regional areas.

Recommendation 6b: Alternatively, adopt a standardised approach to DAMAs that includes Personal Care Workers as a standard feature of streamlined DAMA agreements.

Better coordination of regional visa pathways

The Migration System must place greater priority on regional development, by incentivising existing visa-holders to settle in regional locations as they transition between different visas. The Government is already seeking to expand pathways to permanent residency under visa options such as the ACILA,

and we believe a similar approach could be adopted to attract Student or Temporary Graduate visa holders to regional areas with a requirement to meet regional work conditions.

For example, the Temporary Graduate visas (subclass 485) could offer a “Regional” stream with a fast-tracked, 2 or 3-year pathway to permanent residency for those working in regional Australia. This would also attract student visa holders to regional areas after they complete their studies, as this cohort is usually concentrated in capital cities such as Melbourne and Sydney where major universities are located.

Recent changes to the migration system will reduce the number of potential candidates working in aged care during or after their studies. Reduced student migration inflows and the downstream effects of fewer Temporary Graduate visas will exacerbate immediate and longer-term workforce challenges, as will changes to age eligibility criteria.

Given these new settings, it is imperative that migrants arriving in Australia using these visa streams have pathways to permanent residency, and we recommend these should be geared towards essential services such as aged care and regional locations. We believe this approach will complement efforts to encourage large scale retention of migrants in the regions under current provisional visa settings, which are generally effective at ensuring strong retention of migrants in regional locations.

Recommendation 7: Develop new Temporary Graduate visa streams with a fast-track pathway to permanent residency to incentivise Student and Temporary Graduate visa holders to relocate to regional areas after the completion of their studies.

Overcoming housing pressures in regional Australia

Domestic housing affordability and accessibility challenges cannot be ignored in any consideration of Australia’s permanent migration intake, and the size of the broader migration program. High housing costs and comparatively lower wages in aged care make it very difficult for our existing team members to relocate to regional areas with workforce shortages, while also impacting overseas workers who are unable to find a place to live upon arrival to Australia.

These challenges amplify the workforce and financial pressures facing regional aged care providers, with a lack of housing meaning providers are unable to hire the staff they need to serve their local communities and operate in a financially sustainable way. CEDA⁷ has noted the impact of a lack of affordable housing and its impact on the health and aged care system, with lower occupancy in regional aged care homes adding to bed-block pressures at hospitals. Low regional rental vacancy rates and high rents make it very challenging for migrants to find accommodation when moving to Australia

In one of Bupa’s homes, we have repurposed vacant residential aged care rooms to support migrant team members, providing temporary staff accommodation for them and their families while they find a

⁷ [Duty of Care: Aged Care Sector Running on Empty](#), Committee for Economic Development Australia, October 2023.

permanent place to stay. There is a broader role for government and providers to work together to provide affordable accommodation to staff.

A whole of government approach is needed to deliver new, affordable housing, with a focus on targeted regional communities where aged care workers cannot currently afford to live and work.

Recommendation 8: Establish a whole of government approach to deliver new, affordable housing and work with the aged care sector to identify and prioritise key regional areas to support the development of housing for workers.