

# Survey of registered migration agents about proposed English language changes

## Study for the Office of the Migration Agents Registration Authority

### Report of findings

Amended December 2010

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## Executive summary

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In June 2010, the Office of the Migration Agents Registration Authority (OMARA) commissioned Australian Survey Research (ASR) to conduct a national web survey of all registered migration agents (RMAs) about a proposed change to English language requirements for re-registering migration agents.

In 2008 DIAC reviewed the migration advice profession and one of the outcomes of the review was the proposed English language change. The survey's primary aim was to collect RMA feedback about the proposed change. OMARA project staff developed an initial set of questions which were further refined through discussion with ASR.

In total, all 4,467 migration agents who were registered with OMARA were sent survey invitations and 2,018 responded – a 45% response rate. The number of responses is more than sufficient to be statistically representative of the population as a whole, using commercially acceptable levels of statistical representation. The response profile closely matches the population profile, indicating an unbiased sample.

Respondents were categorised into 3 groups:

1. Those who indicated that they were unlikely to meet the proposed language change (the *affected* group). This was a sub-set of the second group as described in the next point.
2. Those who do not hold a current Australian legal practising certificate nor have matriculation/bachelor degree condition of matriculation with an English pass, instructed in English and hold a 3 year bachelor degree from an Australian, New Zealand, UK or Canadian university (the *target* group).
3. Those who hold a current Australian legal practising certificate or have matriculation/bachelor degree condition of matriculation with an English pass, instructed in English and hold a 3 year bachelor degree from an Australian, New Zealand, UK or Canadian university. This latter group were only asked free text questions about the impact of the proposed change on their business, the immigration advice industry and their clients.

Around 17% of the total RMA population (n=762) is potentially negatively affected by the proposed change while around 7% (n=142) indicate that they will not meet the proposed language requirements.

The *affected* group (those who will not or may not meet the proposed English language requirements on re-registration) is mainly or has predominantly:

- middle aged – not within the youngest or oldest age cohorts
- from Chinese-speaking countries with a majority speaking Chinese at home. The next most common groups affected by the change were born in European and Middle-Eastern countries or the Indian sub-continent. A number are also from Korea.
- educated to the level of bachelor degree
- used a graduate certificate entry pathway to register as an agent
- worked as a migration agent for longer rather than shorter periods
- earning most of their income from working as a migration agent and therefore tending to work longer rather than shorter hours in a week
- seeing up to 50 clients in the previous 6 months
- advising mainly about general skilled migration, student and partner migration visas
- working for profit-based businesses
- indicated that they spoke, read and wrote English well or very well.

Their clients are predominantly from Chinese-speaking countries, mostly located in these countries and affected RMAs speak to their clients mainly in a language other than English. Agents

from the affected group indicate that around 20% of their clients need an English interpreter 75% or more of the time to communicate in English. This is higher proportion of clients than the rest of the RMAs in the target group.

Around 40% of the affected group have taken an IELTS test, but mostly this was 6 or more years ago.

The affected group is unsure about their future or next steps if they do not meet the proposed language requirements. Where respondents indicated a next step, they are likely to undertake self study, followed by asking for an exemption based on industry experience. Most commonly the affected group indicated that they were unsure about whether or not they would leave the migration advice industry as a result of not meeting the language requirements.

It is clear from detailed analysis that most of the affected RMAs are from Chinese-speaking countries and those countries which have small numbers applying for Australian visas, such as eastern European and some Middle Eastern countries. This survey was not able to clearly identify which particular countries or client groups may be negatively affected without understanding the entire immigration advice market.

From this survey there is little evidence to support the repeatedly made assertion of some respondents that particular client groups will be left with no or few migration advisors who can assist them. Where an RMA that is representing a client group may leave the industry, another RMA seems to be available and who will not leave the industry. Some agents believe they will be busier as a result of the proposed change.

The affected group's comments about the proposed change were mostly negative indicating that they will need to change profession, are likely to lose their jobs and income and that there will be less time for clients because of increased time to study English. They believe that businesses may close down. They say that experienced agents with poor English skills may leave the industry and there will be a reduction in the number of bi-lingual agents. Clients may not have someone to go to who can speak their language. The latter comments about clients were balanced by just as many RMAs from the affected group saying that there would be no impact on clients or even a positive impact due to increased professionalism.

The **target** group comprises around 44% of all RMAs. In comparison, the target group has a fairly similar profile, just slightly more or less on some parameters. The target group follows a similar pattern to the affected group on age and country of birth, but more are from Australia and regions such as Europe, the Middle-East, Korea and northern Africa. Education follows a similar pattern, but more in the target group were educated in Australia. Work patterns are fairly similar as are types of businesses (mostly profit-based). The target group gives advice about similar visas – GSM, partners and students – but also employer-sponsored migration. Around two-thirds of the target group do not use an interpreter to communicate with clients and clients are mostly located in Australia.

The target group is more neutral about the impact on themselves and more positive about the proposed changes, with a majority indicating that it will either benefit or have no impact on their business, the industry and clients.

A large majority of RMAs who have a current Australian legal practising certificate and/or meet the education requirements (in other words, who fall outside the scope of the proposed language change) indicate that it will have no or little impact on their businesses, a positive impact on the industry and no or positive impact on their clients.

## Introduction

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On behalf of the Office of the Migration Agents Registration Authority (OMARA), Australian Survey Research (ASR) conducted a national web survey of all registered migration agents (RMAs) about a proposed change to English language requirements for re-registering migration agents.

The survey was conducted in June 2010 and this report presents and discusses the feedback collected. This report outlines:

- The study background, objectives and methodology.
- The respondent profile.
- Key findings in three major sections:
  1. a profile of the RMAs who have indicated that they are unlikely to meet the proposed English language change (the *affected group*) and what they intend to do as a result of the proposed change.
  2. a profile of all RMAs who may be affected by the proposed English language change (the *target group*).
  3. free text comments about the proposed language change from RMAs not affected by the proposed change.

There are four appendices to this report:

1. The sample and population profile comparison.
2. An analysis of RMAs who indicated that they worked for themselves and no-one else.
3. Detailed breakdown of free text comments from different categories of respondents.
4. A copy of the web questionnaire used to collect information.

## Survey background and objectives

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In 2008 DIAC completed a review of the migration advice profession to help assess the effectiveness of the regulatory scheme in place, the state of the profession, and its readiness for a move from statutory self-regulation to self-regulation.

Recommendations from the review included:

- establishing the Office of the Migration Agents Registration Authority which commenced operations on 1 July 2009, and
- that new and re-registering migration agents be required to prove that they have English language proficiency of at least International English Language Testing System (IELTS) 7 (Recommendation 16).

A new and higher standard of English language proficiency for entry to the migration advice profession was implemented for all **initial** registration applications received from 1 January 2010.

OMARA commissioned this recent survey of migration agents to explore options in relation to the implementation of the proposed English language proficiency requirement on **re-registering** migration agents. Information gathered through this survey will be used to:

- Identify the impact of proposed new English language requirements on reregistering migration agents;
- Integrate the findings into enhanced policy and program development, and
- Inform transitional arrangements around the implementation of the requirement.

## Methodology

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OMARA project staff provided ASR with a draft set of questions. Through discussion this was refined and created into a web questionnaire. See final appendix for a copy of the questionnaire.

Effectively, a census of all RMAs was conducted but with a focus on a particular topic, as distinct from an enumerative census. OMARA provided ASR with a complete list of all its registered migration agents' email addresses as well as relevant demographic information such as age ranges, citizenship types, etc, so that this information could be used in analysis. In communication with agents, individual anonymity and confidentiality of answers was assured.

OMARA project staff organised an initial email from the OMARA CEO to be sent to all registered agents advising them of the forthcoming survey. ASR then sent an email invitation containing a personalised hyperlink to the survey. For some agents who did not want to be publicly contacted by email, ASR mailed them a letter containing their unique web link.

The survey was conducted during June 2010 and was open for about 10 working days. During this period, ASR sent two reminders to agents who had not completed their questionnaires.

## Respondent profile

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### Representation

In total, all 4,467 migration agents who are registered with OMARA were sent invitations and 2,018 responded. This is more than sufficient to be statistically representative of the population as a whole, using commercially acceptable levels of statistical representation – a 95% confidence level and  $\pm 5\%$  confidence interval (the margin of error needed to interpret numeric results in this report). The response numbers represent a response rate of just over 45%. More importantly, the response sample was very representative of the population – see appendix A in this report for a comparison of the sample and population on demographics as provided by OMARA.

Only one demographic group appeared to be slightly under-represented – those who are legally qualified. Given that the primary focus of the survey was on those people who were not legally qualified and who may be less proficient in English, this under-representation should not be of concern. The numbers for this demographic sub-group of legally qualified registered migration agents was still sufficient to be representative of a much larger group.

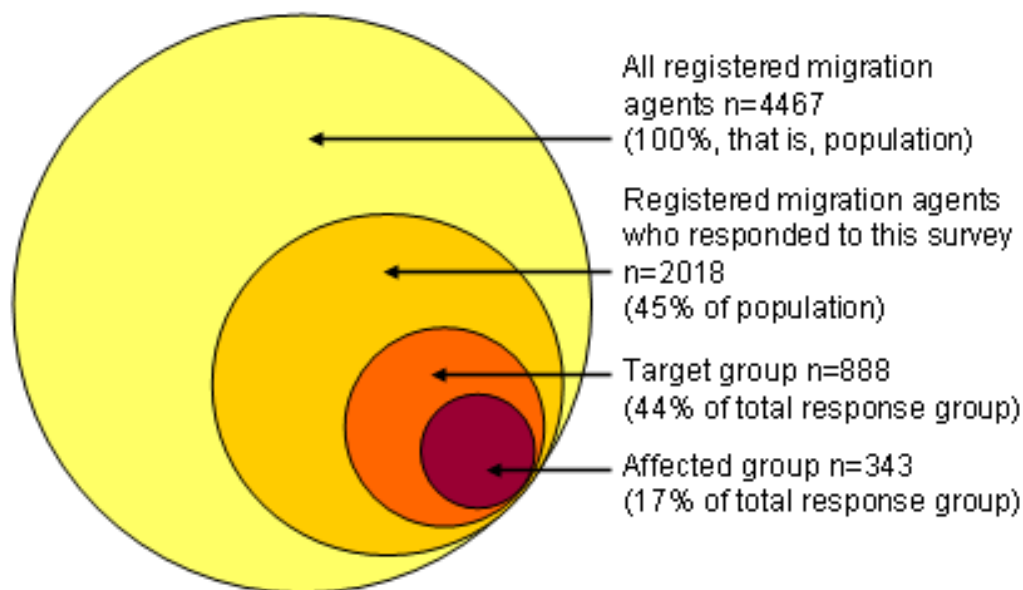
### Breakdown of respondents and terms used

For the rest of the report, RMA indicates registered migration agent. The term *Chinese-speaking* refers to people speaking any form of Chinese, including Mandarin and Cantonese.

For the purpose of this survey, we categorised respondents into three groups:

1. RMAs who currently met the proposed English language requirements and who were not personally affected by the proposed change.
2. RMAs who do not hold a current Australian legal practising certificate or have matriculation/bachelor degree condition of matriculation with an English pass, instructed in English and who hold a 3 year bachelor degree from an Australian, New Zealand, UK or Canadian university. We called this group of respondents the **target group**.
3. RMAs who indicated that they may not or will not meet the proposed English language requirements. We called this group of respondents the **affected group**.

Below is a diagram of the various sets and sub-sets of respondents and the frequency counts and proportions of their responses.



Of the 2018 respondents, 490 indicated that they had a current Australian legal practising certificate, while 640 met the required matriculation/bachelor degree condition of matriculation with an English pass, instructed in English and holding a 3 year bachelor degree from an Australian, New Zealand, UK or Canadian university. This left 888 respondents who could potentially be affected by the proposed language requirement – the target group.

Where a respondent met either of the conditions of having a legal practising certificate and completing matriculation and bachelor degree in the designated countries, they were moved to the end of the questionnaire and only asked three free text questions about the impact of the proposed language requirement. The free text answers from this group are presented in the section named *Comments from all other respondents*.



## Key findings

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The following discussion commences with migration agents who responded to the survey and who indicated that they:

- do NOT have a current Australian legal practising certificate, or
- have NOT completed matriculation with an English pass, where they were instructed in English and do not have a 3 year bachelor degree from an Australian, New Zealand, UK or Canadian university.
- may not or would not meet the proposed changes to the English language requirements for re-registering as an RMA.

The discussion of findings starts with the background of the affected group of migration agents. The following section focuses on the target group.

## Profile of those most affected by proposed language requirements

This section focuses on the impact and consequences of the proposed change. It includes a profile of the migration agents indicating that they are unlikely to meet or would not meet the proposed language requirement. In the following discussion, we have used the term **affected group** to refer to this sub-set of RMAs. They were the respondents who answered *unsure* and *no* to the question “Do you think you would meet the language requirement based on your current level of English?”

A majority of the target group indicate that they will meet the proposed language requirements – on average 60%. A total of 343 RMAs (38.6% of the target group), believe that they may not or will not meet the proposed language requirements. However, of the total target group only 64 (7.2%) indicate that they will not meet the proposed requirement. Note that 13 people did not answer this question about meeting the requirement, so the actual percentages may change by several percentage points.

We know that 2018 of the total of 4467 RMAs answered the questionnaire – a 45% response rate. If we proportionally weight the number of RMAs who said they may or will not meet the proposed language requirements using this response rate, we achieve a total population number of 762 RMAs who may not or will not meet the requirement, that is, 17% of the entire and current RMA population (343 /45% and where the population is 4467). Similarly, an equivalent percentage can be achieved by taking 39% of 45% of 4467.

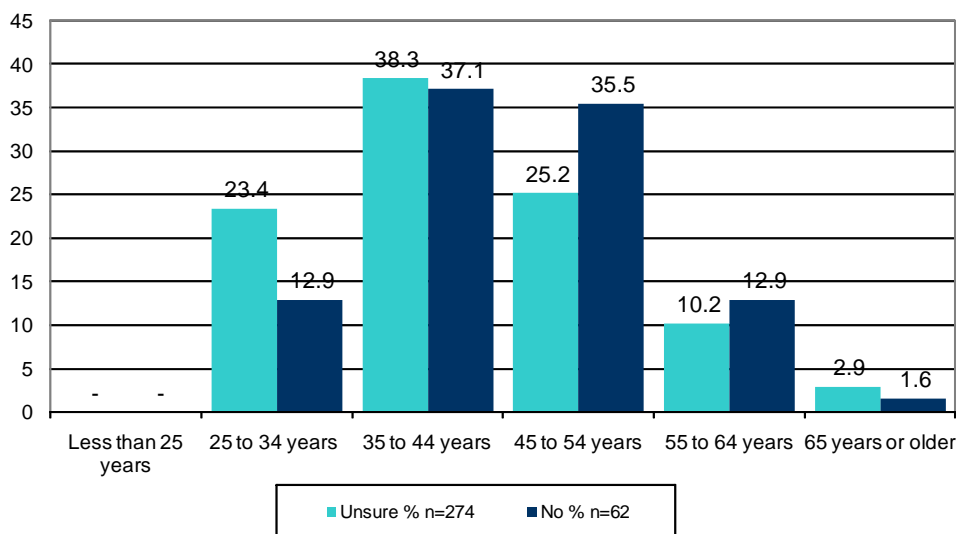
The lowest possible population number is that 142 RMAs will definitely be affected by the proposed requirements if we only consider the proportion, from this survey, of those who are certain that they will not meet the proposed requirements.

### *Demographic profile of affected group*

Given that most RMAs are in the middle age groups, the biggest impact will be felt there. The youngest and the older age groups are less likely to be affected by the proposed change simply because there are no or few affected RMAs in these age groups. See chart on the following page.

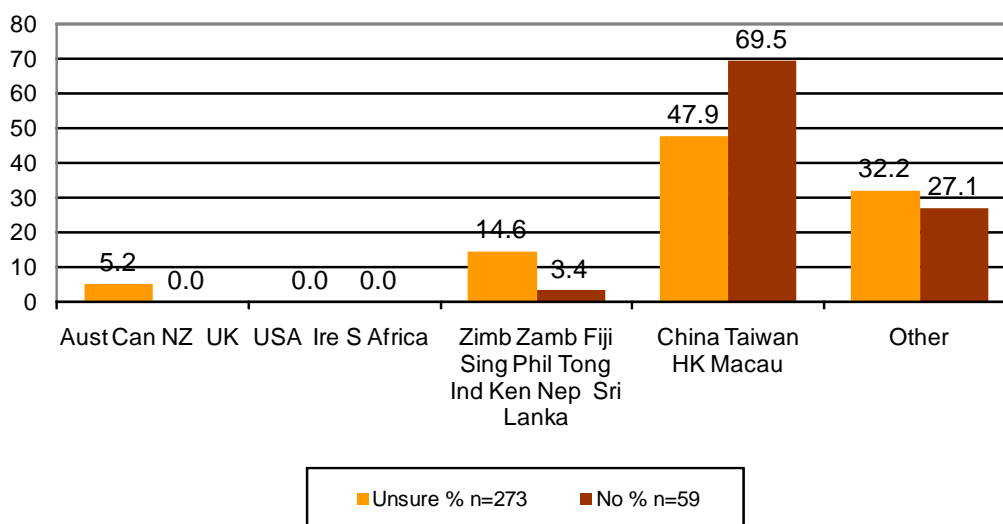


RMA age by meeting proposed language requirement  
% respondents choosing an answer



The highest proportion of RMAs affected by the change will come from Chinese-speaking countries, *other* countries and to a slightly lesser extent the *varied* group of countries (Zimbabwe, etc). Surprisingly a few will come from the English-speaking countries of *Australia, etc*. See chart below.

RMA country of birth by meeting proposed language requirement  
% respondents choosing an answer



Following the pattern of country of birth, the languages spoken at home of affected RMAs are primarily Chinese, English, *other* and Korean.

**Table 1: Affected group's primary language spoken at home**

Language	n	%
English	87	25.4
Mandarin / Cantonese	149	43.4
Spanish	2	0.6
Korean	19	5.5
Croatian	1	0.3
Russian	4	1.2
Hindi	4	1.2
Arabic	4	1.2
Vietnamese	5	1.5
Indonesian	6	1.7
Tamil	2	0.6
Nepali	2	0.6
Filipino or Tagalog	1	0.3
Sinhalese	3	0.9
Other	37	10.8
No answer	17	4.9
<b>Total</b>	<b>343</b>	<b>100.0</b>

A large proportion of the affected group completed year 12 in a Chinese-speaking or *other* country and were instructed in a language other than English. More than three-quarters have a bachelor degree or higher qualification, mostly obtained overseas. See tables 2 and 3 below.

**Table 2: Affected group secondary education**

Country of secondary school	Meet proposed language requirement?		
	Unsure	No	Row total
Australia, Canada, NZ and UK	19	2	21
USA, Ireland and South Africa	1	0	1
Zimbabwe, Zambia, Fiji, Singapore Philippines, Tonga, India, Kenya, Nepal, Sri Lanka	35	2	37
China, Taiwan, HK, Macau	123	36	159
Other	89	18	107
<b>Column total</b>	<b>267</b>	<b>58</b>	<b>325</b>
Main language of instruction			
English	56	4	60
English and other	11	1	12
Other	197	54	251
<b>Column total</b>	<b>264</b>	<b>59</b>	<b>323</b>

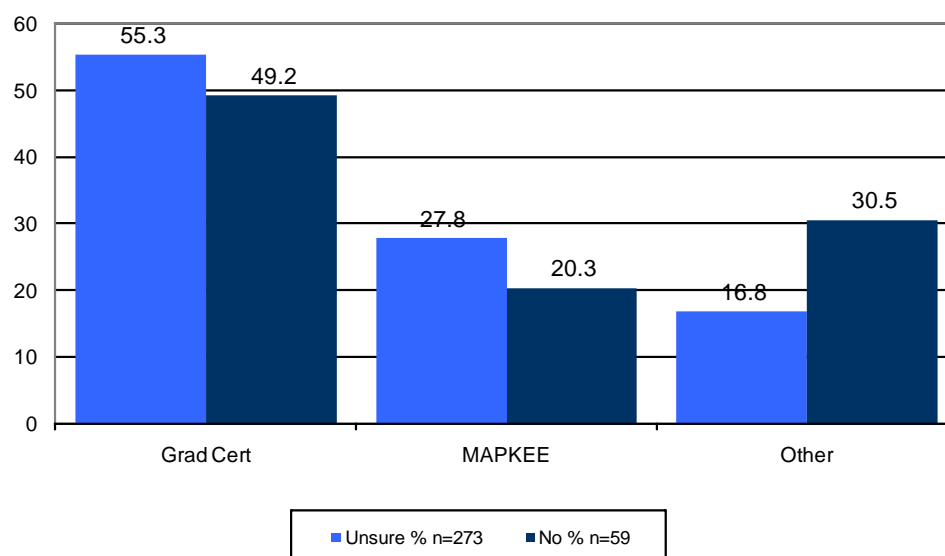
**Table 3: Affected group first post-secondary qualification**

Level of post-secondary qualification	Meet proposed language requirement		
	Unsure	No	Row total
Certificate 1-4 plus Diploma	63	13	<b>76</b>
Bachelor degree	183	46	<b>229</b>
Grad certificate	3	0	<b>3</b>
Grad diploma	2	0	<b>2</b>
Masters and PhD	3	3	<b>6</b>
Other	9	0	<b>9</b>
<b>Column total</b>	<b>263</b>	<b>62</b>	<b>325</b>
Country of study			
Australia, Canada, NZ and UK	48	7	<b>55</b>
USA, Ireland and South Africa	2	0	<b>2</b>
Zimbabwe, Zambia, Fiji, Singapore Philippines, Tonga, India, Kenya, Nepal, Sri Lanka	35	2	<b>37</b>
China, Taiwan, HK, Macau	109	39	<b>148</b>
Other	65	14	<b>79</b>
<b>Column total</b>	<b>259</b>	<b>62</b>	<b>321</b>

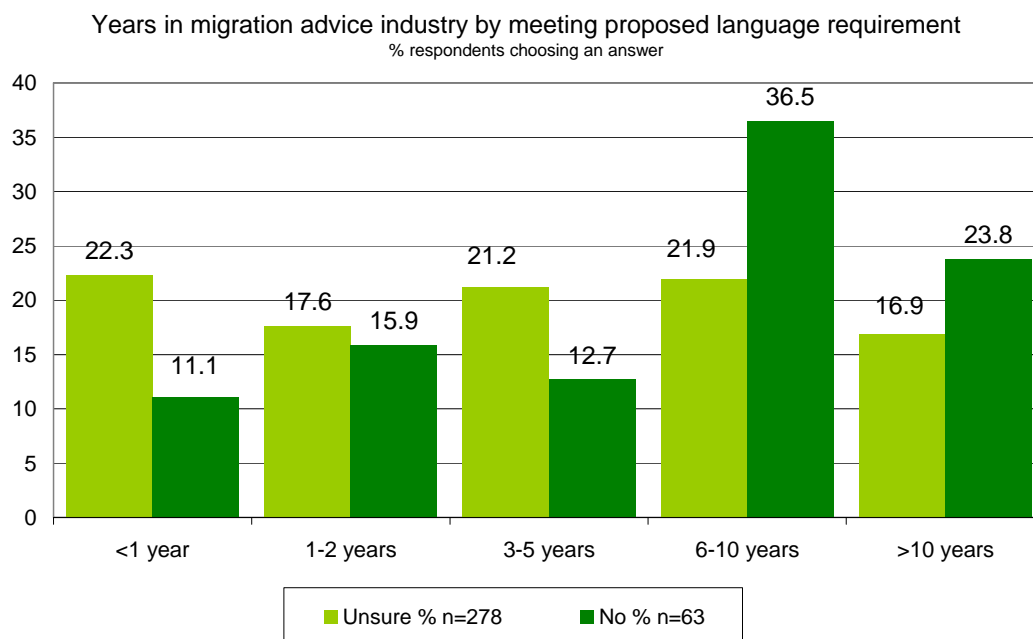
### *Working as a migration agent*

Affected RMAs are more likely to use a Graduate Certificate entry pathway to the profession, but this follows a similar pattern to all RMAs. See chart below.

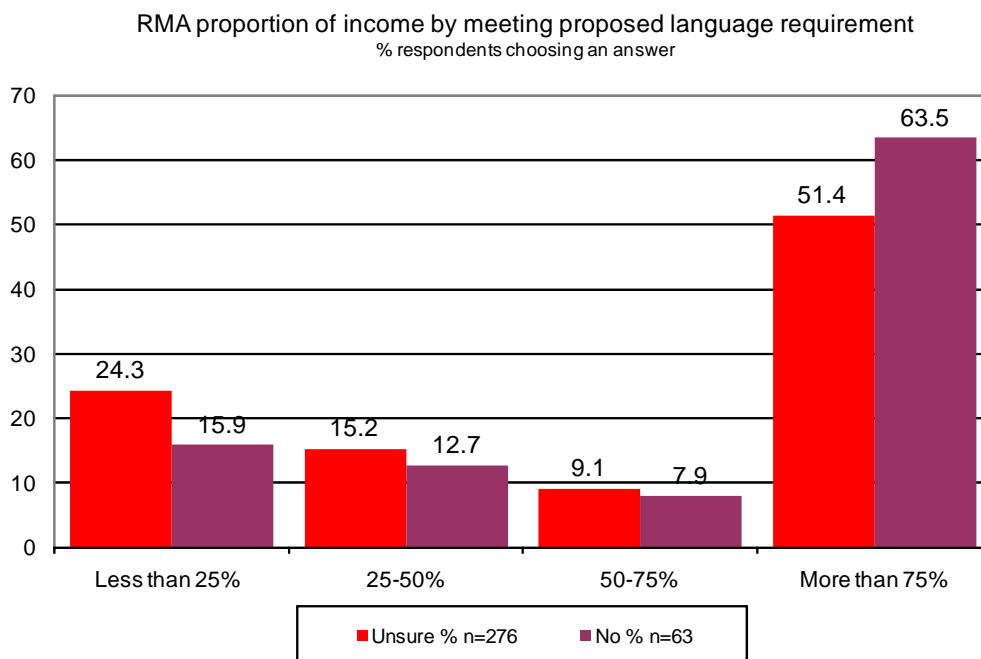
Entry pathway by meeting proposed language requirement  
% respondents choosing an answer



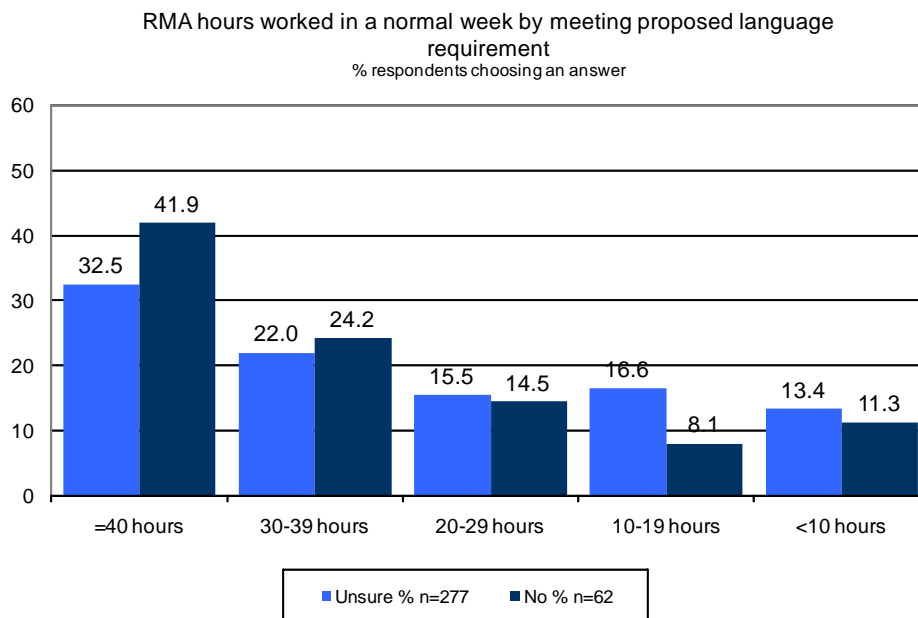
Of the affected group, a higher proportion of RMAs have worked for more years in the migration advice industry and this is a fairly similar profile to all RMAs in the target group. See chart below.



Affected RMAs are most likely to earn most of their income from being a migration agent. However, the unsure sub-group have a more evenly distributed profile and are therefore slightly more likely to earn less of their income from the migration advice industry than the no sub-group. See chart of following page.



The affected group tends to work more hours in a week as an RMA and this follows the pattern outlined in the previous chart – that most commonly the majority of income is earned as an RMA. See chart below for the distribution of hours worked in a week as an RMA.



Affected RMAs follow a similar pattern of client numbers when compared with all target RMAs, but a higher percentage are more likely to have less than 10 clients.

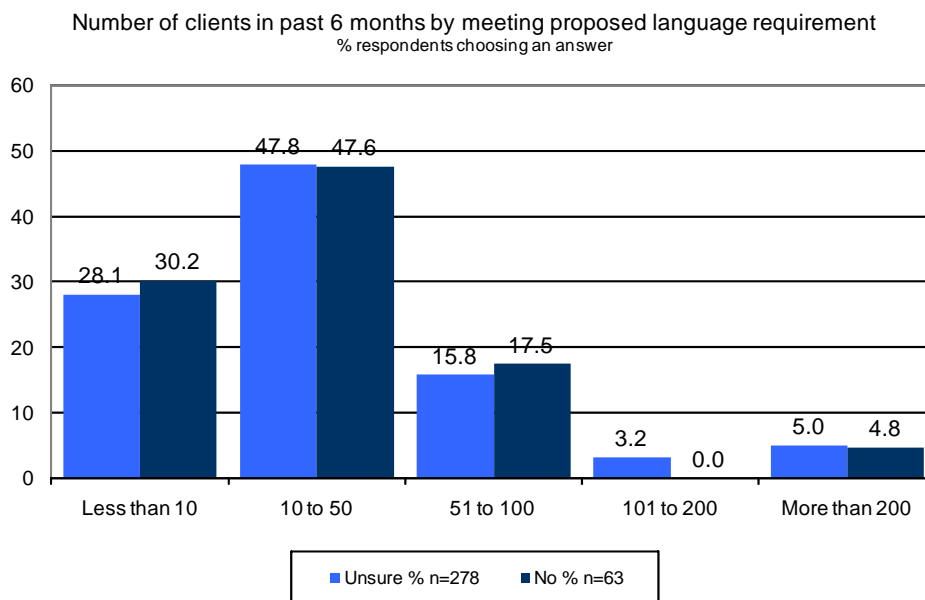


Table 4 below is a cross-tabulation of weekly hours by number of clients within the affected group. It shows that the most commonly affected RMAs work most, if not all, of their working time as migration agents and have up to 50 clients in a six month period. There is a direct correlation between number of hours worked and number of clients, that is, more hours, more clients and vice versa, fewer hours, fewer clients.

**Table 4: Affected group cross-tabulation of hours worked in a week by number of clients advised in past 6 months – counts only**

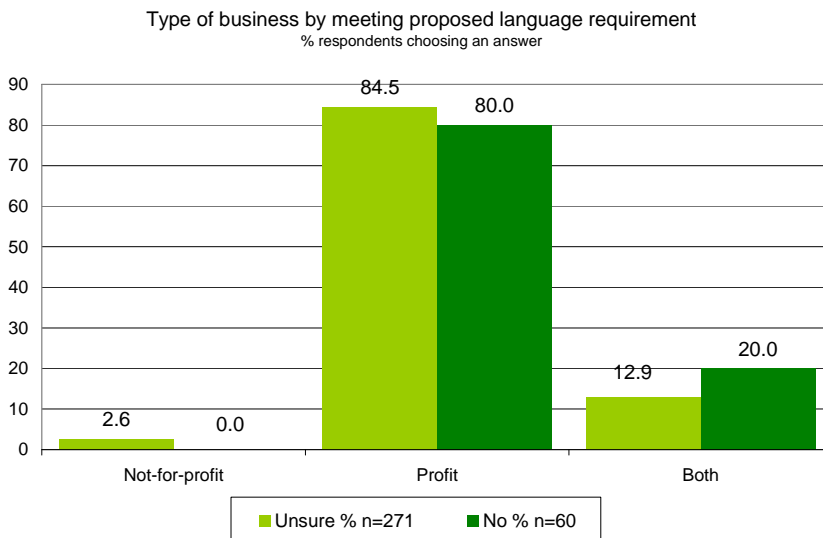
Hours worked a week → Clients advised ↓	<10 hrs	10 - 19 hrs	20 – 29 hrs	30 – 39 hrs	40 hrs +	Row total
Less than 10	29	22	20	17	8	96
10 to 50	12	25	28	42	54	161
51 to 100	2	4	3	16	30	55
101 to 200	0	0	0	1	8	9
More than 200	0	0	1	0	16	17
<b>Column total</b>	<b>43</b>	<b>51</b>	<b>52</b>	<b>76</b>	<b>116</b>	<b>338</b>

Table 5 shows the visa types that the affected group advises about. Respondents could choose more than one answer so the percentage is calculated on the number of affected RMAs.

**Table 5: Affected group - most common visa types advised about**

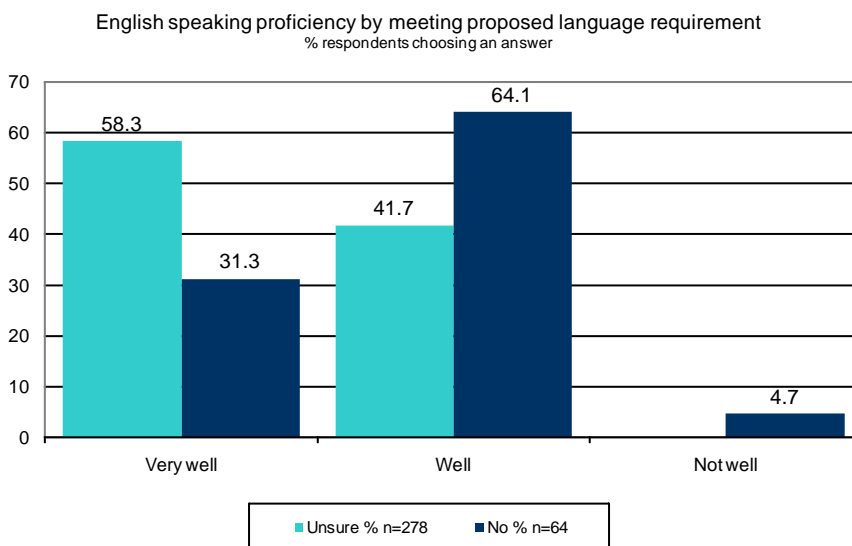
Visa type	% of group n=343
General Skilled Migration	81.9
Student	69.4
Partner Migration	65.3
Employer Sponsored Migration	46.6
Parent Migration	43.7
Business Skills Entry	41.7
Other Family Migration	28.9
Child Migration	15.7
Citizenship or Appeals or Review	12.5
Onshore Protection	5.5
Other	5.0
Humanitarian Offshore	4.1

A majority of affected RMAs work for profit-based businesses, while a much smaller proportion work for mixed-type businesses. Very few of the affected group work in non-profit businesses.



### Language proficiency

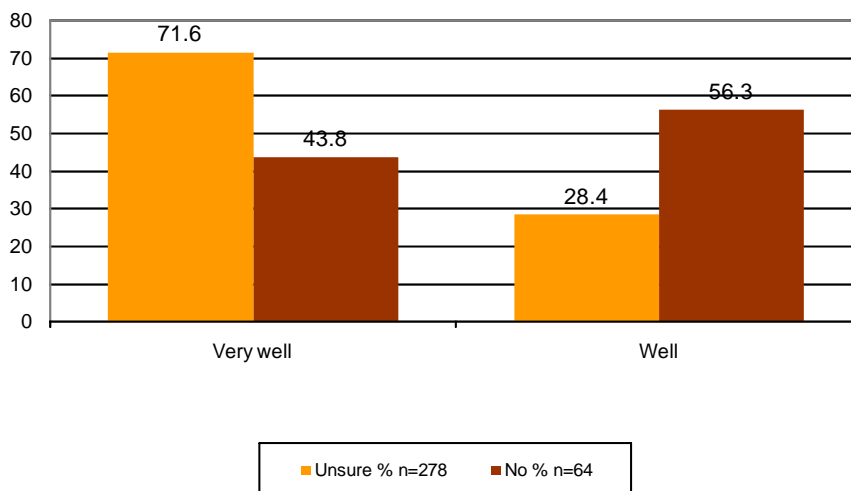
The following finding identifies some inconsistencies in answers. Only three of the affected group rated their English-speaking skills as *not speaking well* and a considerable portion have rated themselves as speaking English *well*. Even some of the RMAs who believe they speak English *very well* have indicated that they would not meet the proposed language requirement.



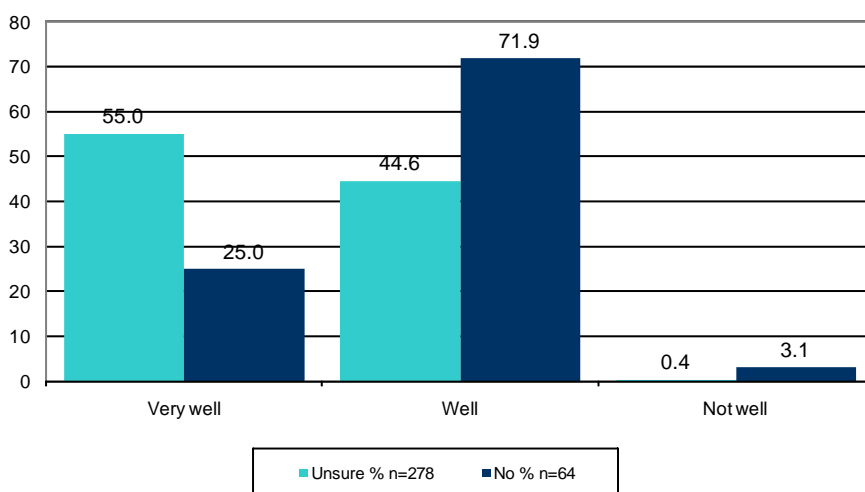
Reading English follows a similar pattern to speaking English, as does writing. Nearly all affected RMAs rated their reading and speaking proficiencies as *very well* or *well* - see next two charts.



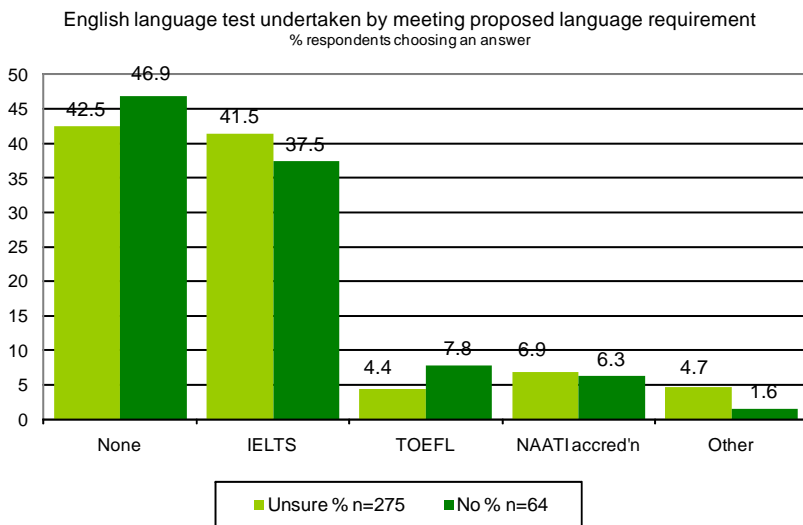
English reading proficiency by meeting proposed language requirement  
% respondents choosing an answer



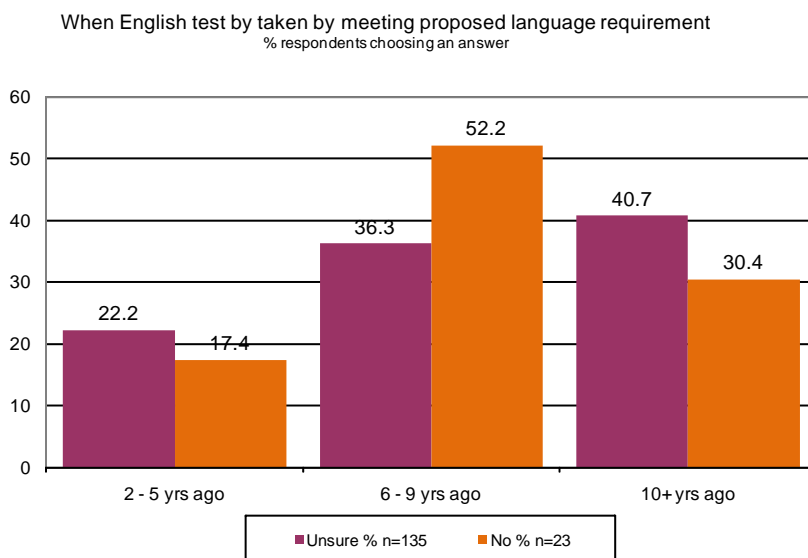
English writing proficiency by meeting proposed language requirement  
% respondents choosing an answer



Over 40% of the affected group have not undertaken any English language test, while a slightly lower proportion has taken IELTS. See chart below.

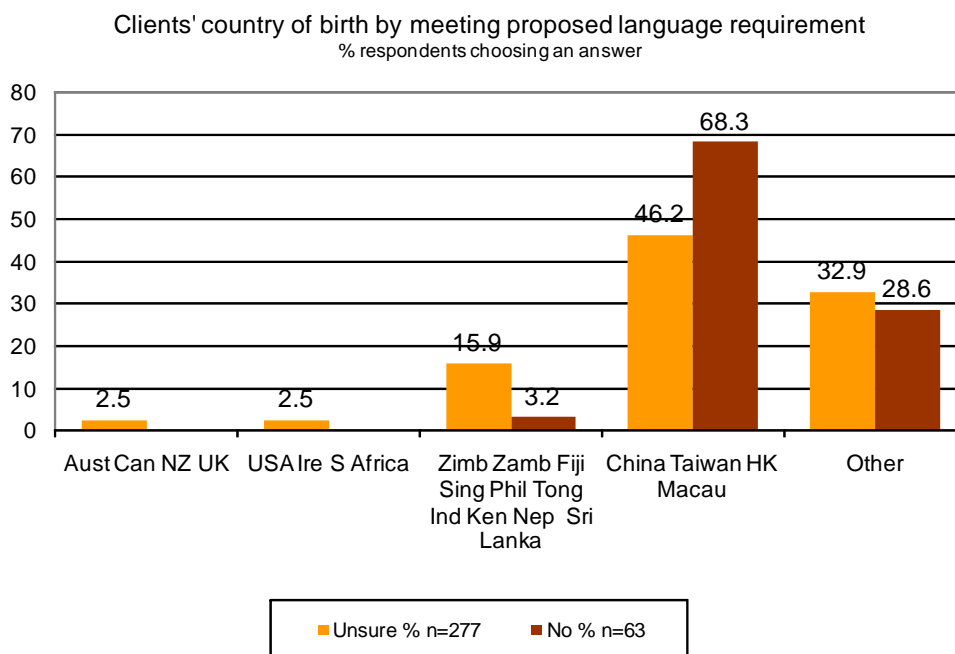


Most of the affected group have taken tests some time ago. The greater the time since taking the test, the more likely an RMA believes that he/she may not or will not meet the proposed requirement. See chart on the following page.

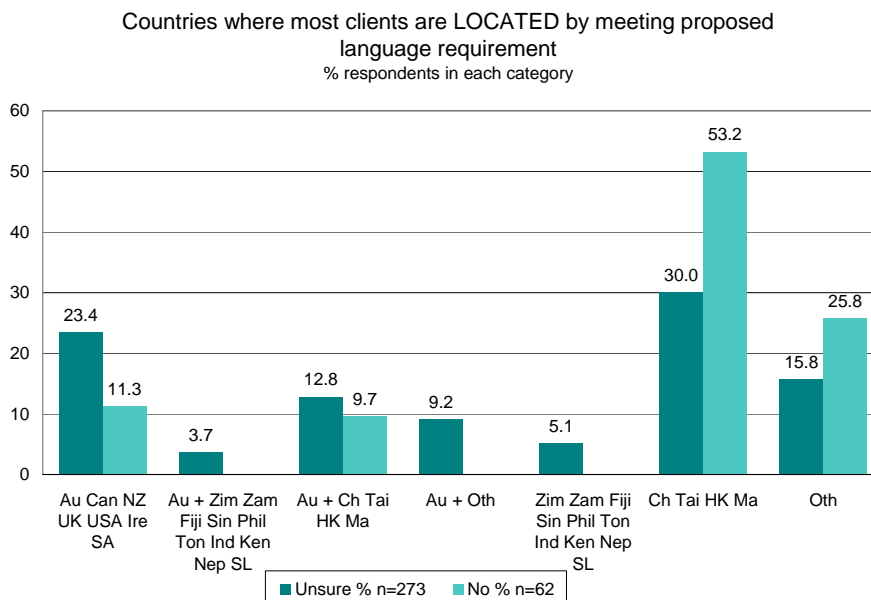


### Clients of affected RMAs

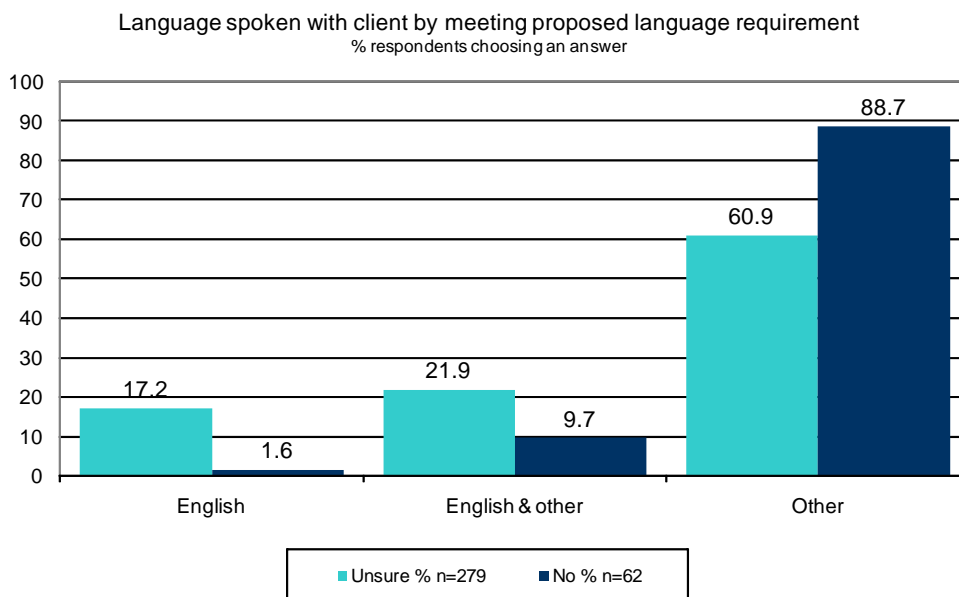
Proportionately, clients from Chinese-speaking countries, *other* and *varied*, in that order, are more likely to be serviced by the affected group – a pattern which closely follows affected migration agents’ countries of birth.



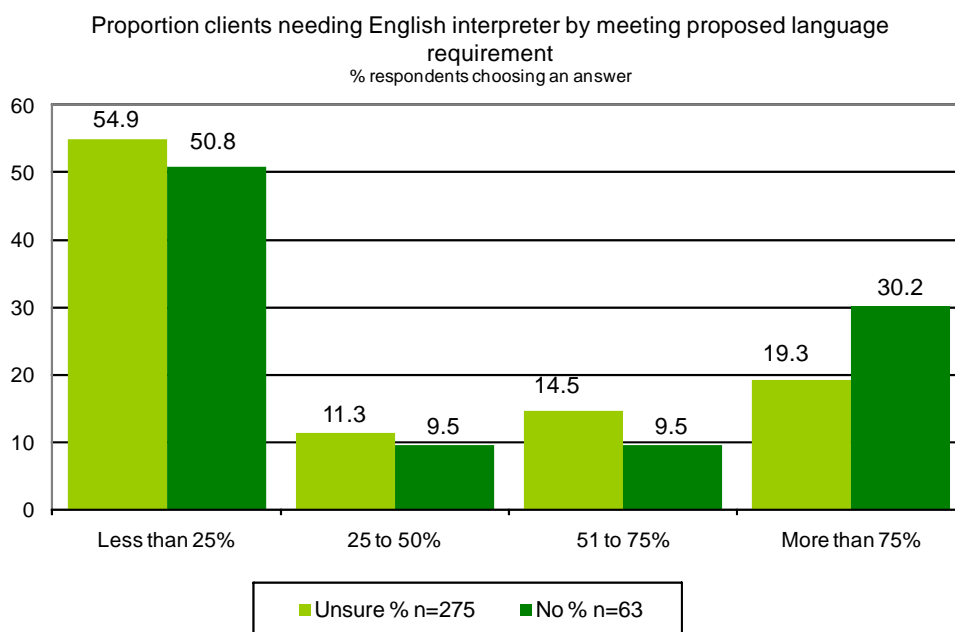
Clients are predominantly located in Chinese-speaking countries and then other countries, followed by Australian (English-speaking) locations.



Following the patterns above, RMAs who speak in a language other than English to their clients are more likely to be affected.



A majority of clients of RMAs in the affected group do not use interpreters but the proportion of affected RMAs whose clients need an English interpreter is higher than non-affected RMAs.



### RMA intentions

The following questions/issues were only presented to those RMAs who indicated that they were *unsure* or *would not* meet the proposed language requirement (the *affected* group). Table 6 is a cross-tabulation of the affected group with their intention to do an English language course. The most common answer to the question about undertaking an English language course to meet the proposed change was *unsure*, that is, they expressed uncertainty about the next step.

**Table 6: Affected group by intention to do an English language course (% column totals)**

Do English language course ↓	Meet proposed language requirement			
	Unsure		No	
	n	%	n	%
Yes	51	18.4	9	14.3
Unsure	132	47.7	24	38.1
No	94	33.9	30	47.6
<b>Total</b>	<b>277</b>	<b>100.0</b>	<b>63</b>	<b>100.0</b>

When asked what else they might do to meet the proposed requirements, fewer than one half of respondents presented with the question provided an answer. Answers that were offered are displayed in table 7. The most common response was to undertake self-study.

**Table 7: Affected group by current level of English – counts only**

What else would you do to meet requirements?	Meet proposed language requirement	
	Unsure	No
Self study	46	2
Exemption based on experience in the industry	29	5
Attend English language course	15	3
Not sure	9	3
Leave industry	5	0
Other	9	6

Table 8 displays the affected group's intention to leave the industry. Uncertainty is the predominant response. However, 67 of the affected group believe they will not leave the industry and 25 of these have indicated that they are unsure of or will not be studying an English language course. Of these 25, eight indicated that they would self study and three said that they would apply for an exemption.

**Table 8: Affected group by intention to leave the immigration advice industry – counts only**

Would you leave the industry?	Meet proposed language requirement	
	Unsure	No
Yes	47	38
Unsure	170	17
No	60	7

### *Employer perspective*

Table 9 shows that of the 119 employers in the target group, around 45% indicate that the proposed change would affect none of the people they employ, while over a third indicate that it would affect a substantial portion of the people they employ (more than 50% of employees). It is very important to note that this is the view from employers themselves who are likely to be affected by the proposed language change (the target group) and that it cannot be assumed to represent the views of all employers of RMAs.

**Table 9: Employer perspective on RMAs employed by them**

Proportion of RMAs employed and affected by proposed language change	n	%
None	53	44.5
Less than 25%	10	8.4
25-50%	13	10.9
51-75%	9	7.6
More than 75%	34	28.6
<b>Total</b>	<b>119</b>	<b>100.0</b>

### *Client country groups which may be negatively affected*

Extensive analysis was conducted to identify which, if any, client country groups may be adversely affected as a result of the proposed changes. RMAs were asked for their clients’ countries of birth and these countries were analysed by the RMA’s likelihood of meeting the proposed English language requirements.

In some cases a single RMA respondent indicated that they had clients from a particular country, for example, only one RMA had clients from Mexico. Other countries in this situation were Turkey, Czech Republic and ex-USSR republics. However many countries had RMAs who serviced clients from countries where RMAs were both affected and not affected by the change. So, for example, Bangladesh had RMAs who indicated that they would meet the requirements and not meet the requirements. So if one RMA left the industry as a result of the proposed change, there would be others to take their place. Similarly, many people with clients from Chinese-speaking countries indicated that they would be affected by the change, but even more RMAs with clients from these countries indicated that they would not be affected. Taking this analysis further was fairly meaningless without understanding the net impact of the proposed change, and not just the view from one group of people. Over half the population of RMAs did not respond and they may service clients from the same countries as those RMAs negatively affected by the change.

For example, if one RMA who serviced Mexican clients indicated that they would not stay in the industry if the proposed change was implemented, ASR has no way of understanding how many other RMAs who did not respond to the survey would still be able to service these Mexican clients.

It is clear that most of the affected RMAs are from Chinese-speaking countries and those countries which have small numbers applying for Australian visas, such as eastern European and some Middle Eastern countries. This survey was not able to clearly identify which particular countries or client groups may be negatively affected without understanding the entire immigration advice market.

From this survey there is little evidence to support the repeatedly made assertion of some respondents that particular client groups will be left with no or few migration advisors who can assist them. There is considerable evidence to indicate that for the nearly all countries or language groups serviced by agents likely to leave the industry, other registered migration agents will be available to service the clients of the agents leaving.

### *Comments about proposed change*

ASR has coded all comments and the following are themed comments offered by the affected group only. In some instances, multiple comments have been offered by respondents, so the number of comments do not necessarily reflect the number of respondents making them. The numbers of comments cannot be inferred to represent quantitative amounts – they should be treated qualitatively and therefore indicative only of sentiment.

ASR has categorised comments into positive, neutral and negative groups and these are displayed in the tables along with the number of times a type of comment has been mentioned. Consistent

themes have been used wherever possible throughout the analysis which is why some counts are very small for some themes in the tables below.

The following set of tables display the themes from the questions about the impact of the proposed change on them (the migration agent) personally, their business, the immigration advice industry serving Australia and clients.

**Table 10: Comments of affected group about personal impact of proposed change**

Positive	Count	Neutral	Count	Negative	Count
Appreciate new changes, will adapt, increase motivation, it's better for me	11	Unnecessary, should be exempt as a result of experience and time in Australia	32	I'll change professions, I'll lose my job and income	117
		No effect / impact, nothing	26	Increased time required, more pressure and stress, less time for clients	72
		Unsure / don't know	10	Increased financial burden/cost	16
		Not applicable (respondent's answer did not match the question asked)	9	My business will close down	5
				An insult to me and my abilities	5
				Inconvenient	3
				Will lose registration	2
				Discriminatory	1

**Table 11: Comments of affected group about impact on the business they own or work for**

Positive	Count	Neutral	Count	Negative	Count
It will benefit the business / industry / increased professionalism / higher service and advice standards	7	No effect, no impact, nothing	41	My business will close / I will leave the industry if changes are implemented	133
		Not applicable (respondent's answer did not match the question asked)	21	Waste of time, reduces time available to work with clients, puts added stress and pressures on agents	30
		Unnecessary / people of high experience (in terms of years served) and qualifications should be exempt	12	The business will suffer greatly / loss of employees / they will have to start new careers	30
		Unsure / don't know	11	Increased cost of business operation / will reduce revenue	16



**Table 12: Comments of affected group about impact on the immigration advice industry serving Australia**

Positive	Count	Neutral	Count	Negative	Count
Experienced or professional agents with good skills but with poorer English skills will be forced to leave industry / will eliminate very poor English speaking agents	60	Not applicable (respondent's answer did not match the question asked)	35	Reduction in number of bi-lingual agents / will make serving clients with specific language requirements harder	34
It will benefit the industry, higher service and advice standards and improved reputation	21	No change, no effect, no impact	31	Negative effect on the industry / will be seen as discriminatory	19
Will create a higher qualified agent work force in the industry	9	Unsure / don't know	6	More agents will work unregistered if they fail / will force clients to seek overseas or unregistered agents if they cannot find a registered one who can speak their language	3
The industry will become more professional in its operations and conduct	2			Makes it harder for clients and businesses as a result of increased costs	3
				Less cultural diversity in the industry	1

**Table 13: Comments of affected group about impact on their clients**

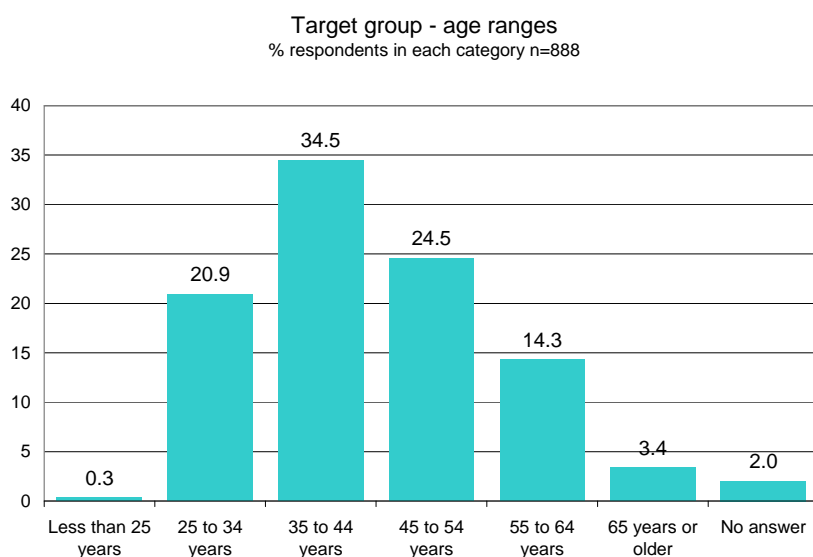
Positive	Count	Neutral	Count	Negative	Count
Positive impact, increased business, greater service, professionalism and higher standards offered to clients	11	No change, no effect, no impact	101	Clients don't speak English / they need agents who speak their language / will be difficult for clients if these agents are not in business as a result	132
		Not applicable (respondent's answer did not match the question asked)	4	Greater financial costs to client	26
		Unsure / don't know	3	Clients are worse off because of reduced time to work on case load, as a result of higher admin, study and testing for IELTS	10
				Fewer migrants to Australia / will go elsewhere	4

## Profile of target group

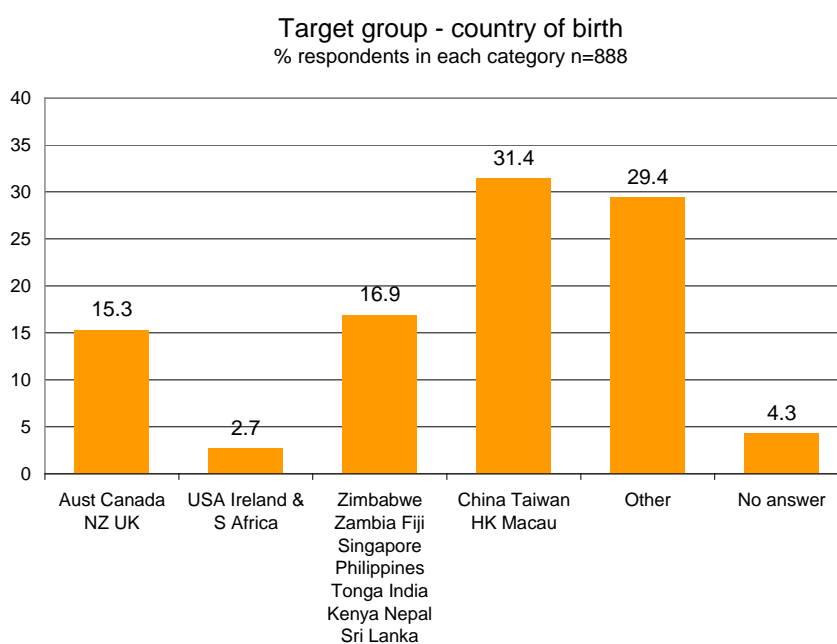
The target group comprises 44% of all RMAs who responded. The target group's demographic profile is very similar to the overall RMA profile in terms of age, years of experience, location and time as a registered migration agent. Apart from legal qualifications and citizenship, it has similar characteristics to the overall RMA population – see appendix A for profile comparisons. The target group includes the affected group whose profile has been outlined in the previous section.

### *Basic demographics and language proficiency*

Most commonly, target group migration agents are aged from 35 to 44 years. The average age is 45 years.



Around 18% of the target group were born in English-speaking countries, while close to a third were born in Chinese-speaking countries. Of the target group, 117 were born in Australia.



Nearly half of the target group indicate that they speak English at home while over a quarter speak some form of Chinese.

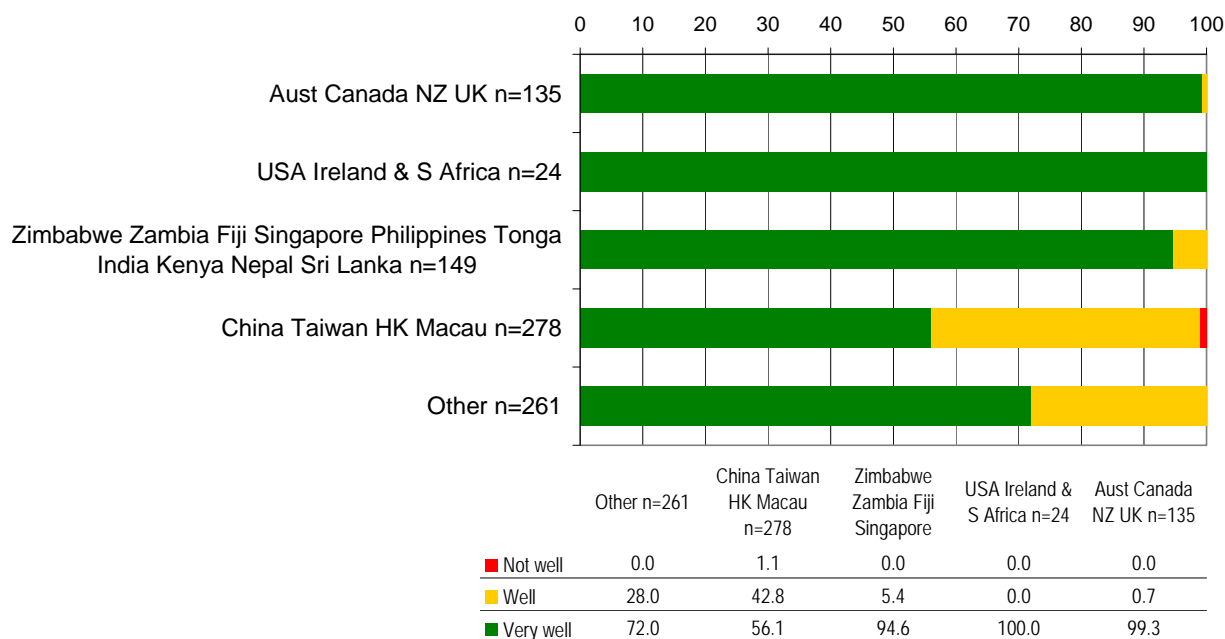
**Table 14: Language spoken at home**

Language spoken at home	n	%
English	441	49.7
Mandarin / Cantonese	244	27.5
Korean	41	4.6
Punjabi	20	2.3
Japanese	13	1.5
Russian	12	1.4
Hindi	11	1.2
Arabic	10	1.1
Vietnamese	10	1.1
Other	76	8.6
No answer	10	1.1
<b>Total</b>	<b>888</b>	<b>100.0</b>

When English language proficiency is examined by country of birth, those from Chinese-speaking countries have the lowest proficiency levels. However, for this country of birth group, reading levels are reported as higher than the other two forms of communicating (speaking and writing). See the associated 3 charts.

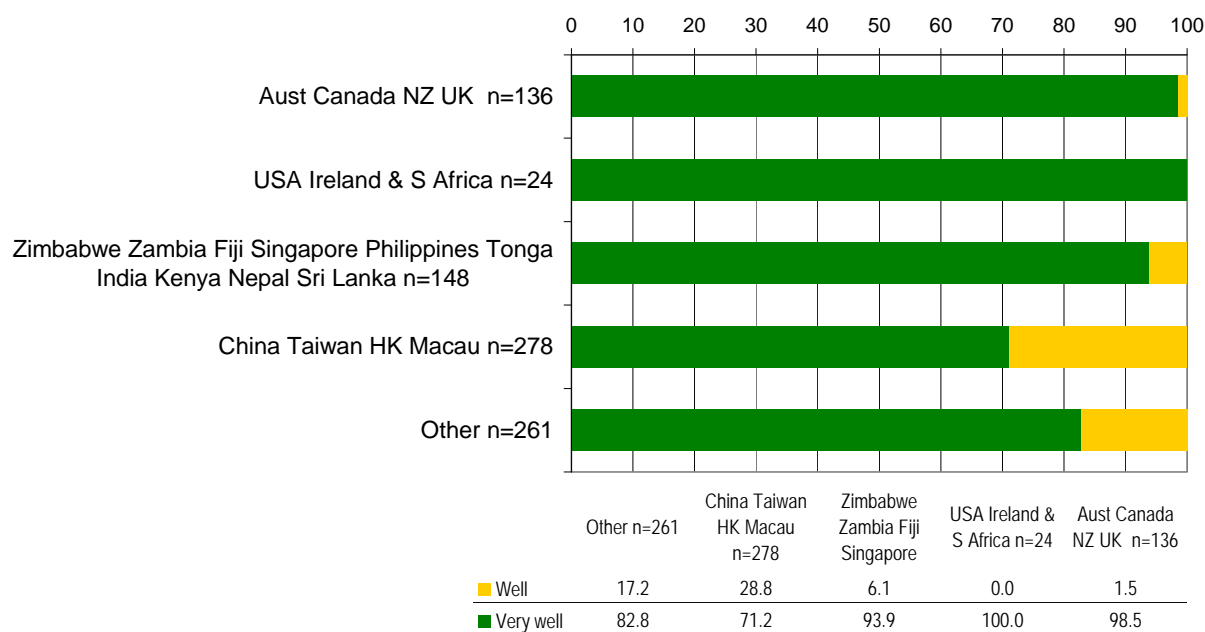
**English speaking proficiency by country of birth**

% respondents choosing an answer



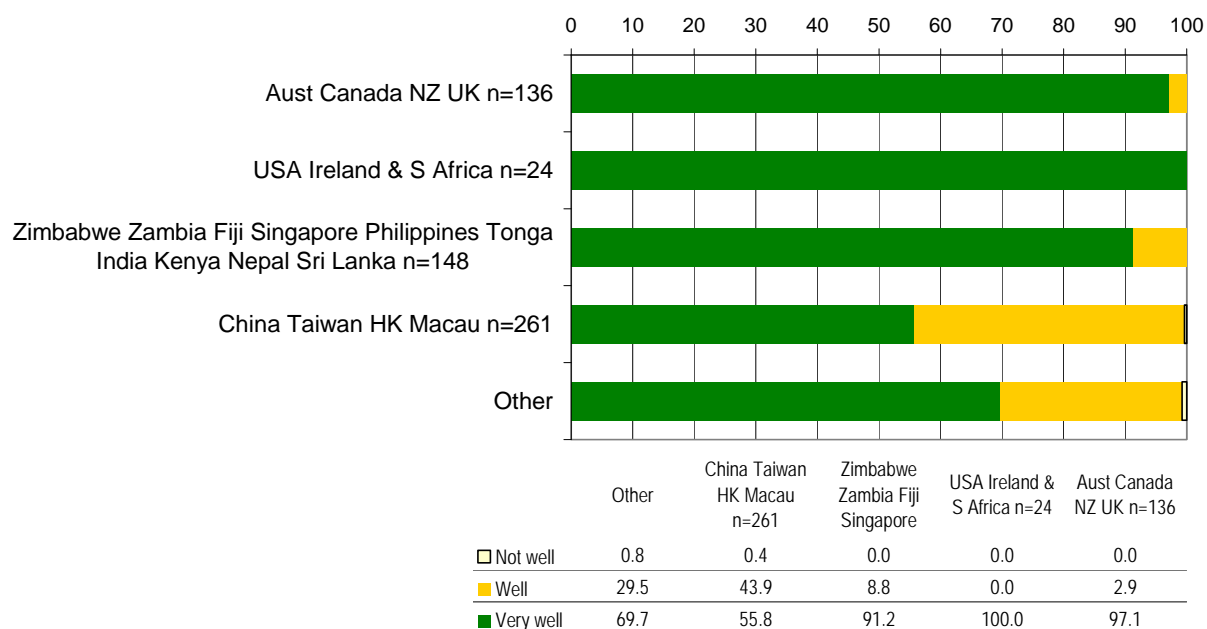
### English reading proficiency by country of birth

% respondents choosing an answer



### English writing proficiency by country of birth

% respondents choosing an answer



One half of the target group have undertaken an English language test. Where a test has been taken, IELTS is by far the most common test.

**Table 15: English language test completed**

Test name	n	%
None	444	50.0
IELTS	315	35.5
TOEFL	27	3.0
NAATI Accreditation	57	6.4
Other	27	3.0
No answer	18	2.0
<b>Total</b>	<b>888</b>	<b>100.0</b>

While only half of the target group indicated that they had taken a test, many fewer reported their test scores. No-one indicated that they completed a TOEFL test 5 years ago or more recently and no-one indicated that they completed NAATI accreditation less than 2 years ago. From the data provided, the IELTS and NAATI test results are displayed in tables 16 and 17.

**Table 16: Reported IELTS score by time test taken – counts only**

Time test taken	IELTS <6	IELTS 6-6.5	IELTS 7 +
<b>Total n=275</b>			
< 2 years ago	0	1	7
2 - 5 years ago	1	31	57
6 - 9 years ago	1	57	58
10+ years ago	2	35	25

**Table 17: Reported NAATI accreditation levels by time test taken – counts only**

Time test taken	Para-prof	Prof	Advanced
<b>Total n=21</b>			
2 - 5 years ago	1	2	0
6 - 9 years ago	3	2	0
10+ years ago	4	8	1

## Education

Table 18 is a cross tabulation of the highest level of secondary schooling by country of **birth** and language of instruction. Note that the table contains absolute numbers, not relative percentages. It indicates that all but 8 of the target group agents who were born in English-speaking countries were also instructed in English and that a considerable portion of those born outside English-speaking countries were also instructed in English.

Most of the target group (n=699 in table 18) report having year 12 or equivalent secondary education. Also note that cross tabulations exclude *no answers* to any question that is cross tabulated with another, so cross tabulation totals are nearly always lower than the totals to a single question which has not been cross-tabulated. In fact, 85% (n=756) of the target group have indicated that they completed year 12 or equivalent, but some of these respondents have not provided answers to questions about country of birth, and/or language of instruction.

The most common non-English circumstance is being born in a Chinese-speaking country and being instructed in a language other than English (most probably Chinese).

**Table 18: Highest level of secondary schooling by country of birth and language of instruction – frequency counts only**

Country of BIRTH group→	Aust Canada NZ UK	USA Ireland & S Africa	Varied*	China Taiwan HK Macau	Other	Row total
<b>Instruction language - English</b>						
Below year 10	1	0	0	0	0	1
Year 10 (or equivalent)	19	0	8	1	3	31
Year 11 (or equivalent)	20	0	3	1	11	35
Year 12 (matric level or equiv)	81	15	93	23	42	254
Other	5	1	4	2	4	16
<b>Column total</b>	<b>126</b>	<b>16</b>	<b>108</b>	<b>27</b>	<b>60</b>	<b>337</b>
<b>Instruction language - English &amp; other</b>						
Below year 10	0	0	0	0	0	0
Year 10 (or equivalent)	0	0	1	0	0	1
Year 11 (or equivalent)	1	0	0	0	1	2
Year 12 (matric level or equiv)	0	3	6	4	9	22
Other	0	0	1	0	1	2
<b>Column total</b>	<b>1</b>	<b>3</b>	<b>8</b>	<b>4</b>	<b>11</b>	<b>27</b>
<b>Instruction language - not English</b>						
Below year 10	0	0	0	2	0	2
Year 10 (or equivalent)	0	0	1	2	3	6
Year 11 (or equivalent)	0	0	1	0	4	5
Year 12 (matric level or equiv)	1	3	27	226	166	423
Other	0	0	1	8	6	15
<b>Column total</b>	<b>1</b>	<b>3</b>	<b>30</b>	<b>238</b>	<b>179</b>	<b>451</b>

\* Varied = Zimbabwe, Zambia, Fiji, Singapore, Philippines, Tonga, India, Kenya, Nepal & Sri Lanka combined

Just over 94% (n=812) of the target group indicated that they completed qualifications after secondary school. Most commonly this was a bachelor degree. Of the people who completed secondary education in Australia, 81 indicated that they also completed post-secondary qualifications.

**Table 19: Post secondary education – level only**

Type of post-secondary qualification	n	%
Certificate 1-4 plus Diploma	214	26.4
Bachelor degree	498	61.3
Grad certificate	18	2.2
Grad diploma	3	.4
Masters and PhD	25	3.1
Other	47	5.8
No answer	7	.9
<b>Total</b>	<b>812</b>	<b>100.0</b>

Note that while table 18 was based on country of **birth**, tables 20 and 21 are based on country of **study**. Most frequently, the *Aust Canada, NZ and UK* group's first post-secondary qualification is lower than bachelor degree level, while all other countries of study most commonly have a bachelor degree as their first qualification. See bold yellow highlights in table 20. This difference in educational pattern is caused by one of the screening questions asked at the beginning of the survey: those who "have NOT completed matriculation with an English pass and where they were instructed in English and do not have a 3 year bachelor degree from an Australian, New Zealand, UK or Canadian university" were not required to answer most of the questions in the survey. So this left mostly those from the *Aust Canada, NZ and UK* group who had less than bachelor level qualifications as part of the target group.

**Table 20: Post secondary education levels – first qualification by country of study**

Country of STUDY group→	Aust Canada NZ UK		USA Ireland & S Africa		Varied*		China Taiwan HK Macau		Other		Row total	
	n	Col %	n	Col %	n	Col %	n	Col %	n	Col %	n	Row %
Certificate 1-4 plus Diploma	119	<b>52.2</b>	5	17.2	17	14.5	38	16.4	28	15.4	207	26.3
Bachelor degree	57	25.0	20	<b>69.0</b>	88	<b>75.2</b>	188	<b>81.0</b>	135	<b>74.2</b>	488	61.9
Grad certificate	17	7.5	1	3.4	0	0.0	0	0.0	0	0.0	18	2.3
Grad diploma	1	0.4	0	0.0	2	1.7	0	0.0	0	0.0	3	0.4
Masters and PhD	12	5.3	0	0.0	2	1.7	3	1.3	8	4.4	25	3.2
Other	22	9.6	3	10.3	8	6.8	3	1.3	11	6.0	47	6.0
<b>Column total</b>	<b>228</b>	<b>100.0</b>	<b>29</b>	<b>100.0</b>	<b>117</b>	<b>100.0</b>	<b>232</b>	<b>100.0</b>	<b>182</b>	<b>100.0</b>	<b>788</b>	<b>100.0</b>

\* Varied = Zimbabwe, Zambia, Fiji, Singapore, Philippines, Tonga, India, Kenya, Nepal & Sri Lanka combined

Respondents were asked if they had a higher level qualification than their first qualification and, if so, they were asked for their highest level qualification. For those in the *Australia Canada NZ UK* group who had a further qualification a significant proportion had post-graduate qualifications and, most commonly, a masters or PhD level qualification. Significant portions of the *varied*, the *Chinese-speaking countries* and the *other* countries also had masters and PhD level qualifications. Bold yellow highlights in table 21 indicate the most common further and higher level qualifications for each country group.

A comparison of the n counts in tables 20 and 21 shows that a considerable portion of the target group has obtained their post-graduate qualifications, as distinct from their undergraduate qualifications, in Australia.

**Table 21: Post-secondary education – highest level of further qualifications by country of study**

Country of STUDY group→	Aust Canada NZ UK		USA Ireland & S Africa		Varied*		China Taiwan HK Macau		Other		Row total	
	n	Col %	n	Col %	n	Col %	n	Col %	n	Col %	n	Row %
Certificate 1-4 plus Diploma	67	14.3	3	13.6	4	8.2	5	12.2	2	3.7	81	12.7
Bachelor degree	32	6.8	9	<b>40.9</b>	13	26.5	12	29.3	25	<b>46.3</b>	91	14.3
Grad certificate	89	18.9	0	0.0	0	0.0	2	4.9	0	0.0	91	14.3
Grad diploma	47	10.0	2	9.1	2	4.1	3	7.3	0	0.0	54	8.5
Masters and PhD	208	<b>44.3</b>	6	27.3	24	<b>49.0</b>	17	<b>41.5</b>	21	<b>38.9</b>	276	<b>43.4</b>
Other	27	5.7	2	9.1	6	12.2	2	4.9	6	11.1	43	6.8
<b>Column total</b>	<b>470</b>	<b>100.0</b>	<b>22</b>	<b>100.0</b>	<b>49</b>	<b>100.0</b>	<b>41</b>	<b>100.0</b>	<b>54</b>	<b>100.0</b>	<b>636</b>	<b>100.0</b>

\* Varied = Zimbabwe, Zambia, Fiji, Singapore, Philippines, Tonga, India, Kenya, Nepal & Sri Lanka combined



The following table displays the numbers within the target group who have matriculated from three designated country groups and who have a bachelor degree or PhD.

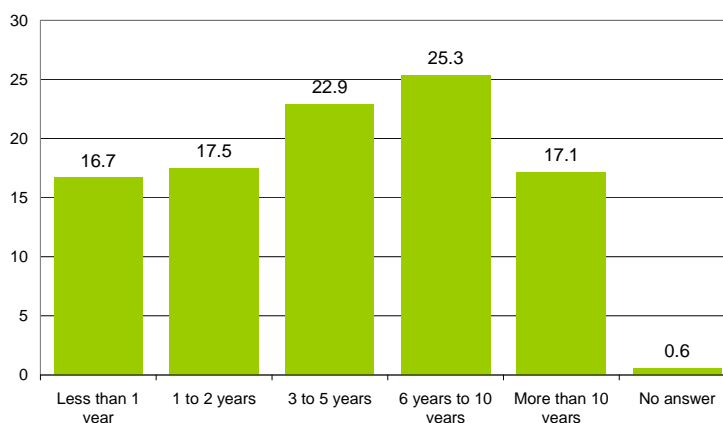
**Table 22: Matriculation and post-secondary education – counts for three country groups only**

Country of matriculation	Bachelor degree or PhD
Australia, Canada, NZ and UK	15
USA, Ireland and South Africa	23
Zimbabwe, Zambia, Fiji, Singapore Philippines, Tonga, India, Kenya, Nepal, Sri Lanka	94

### *Working as a migration agent*

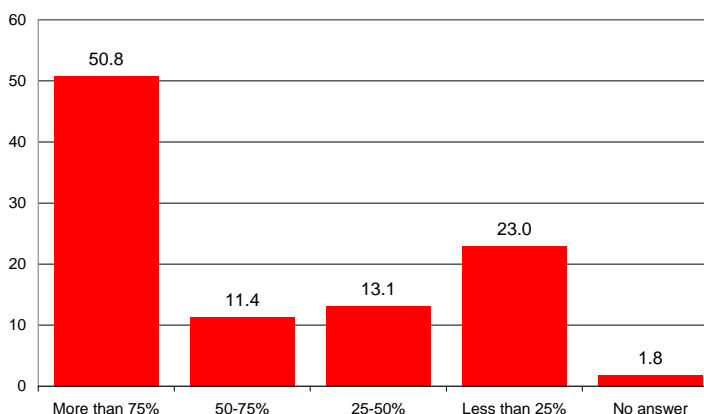
The length of time that migration agents in the target group have worked in the migration advice industry is fairly evenly spread across all time groups. Around a third of the target group has been registered for 2 years or less, while over 40% have been registered for 6 years or longer.

Target group - years working in migration advice industry  
% respondents in each category n=888



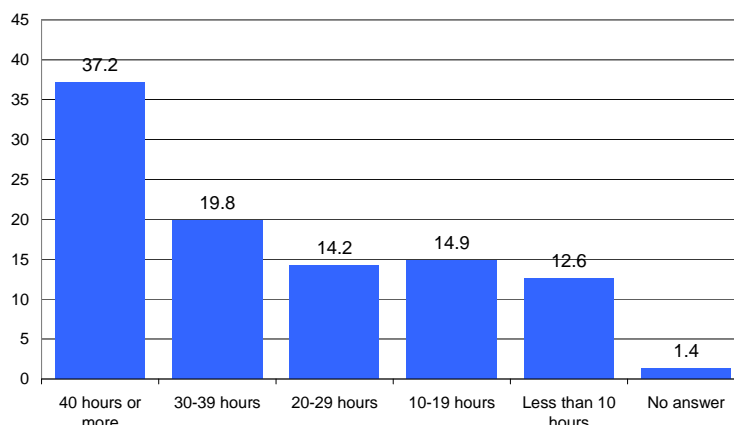
Half of the target group earns nearly all of their income working as a migration agent. The corollary is that the same proportion has other sources of income.

Target group - proportion of income earned working as migration agent  
% respondents in each category n=888



The hours worked per week follows a roughly similar pattern to proportion of income. Around 57% work for 30 or more hours per week as a migration agent, that is, most of their working week. Therefore the remainder work only part of the week as a migration agent, and some only work part-time solely as an RMA. But the latter is less likely as the previous chart on amount of income indicates that many of the target group have more than one source of income.

Target group - hours per week worked as migration agent  
% respondents in each category n=888



Over 80% of the target group provided advice to 10-50 clients or fewer in the previous 6 months.

Target group - number of personal clients in past six months  
% respondents in each category n=888

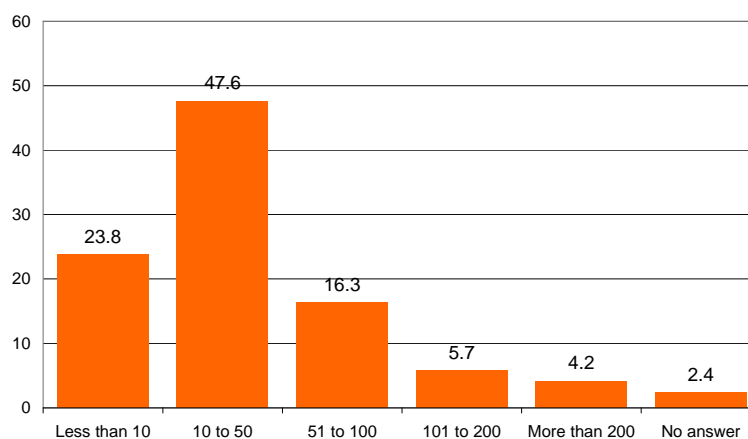


Table 23 is a cross-tabulation of hours worked and number of clients advised in the last 6 months. It shows a strong correlation between number of hours and clients. A majority of target group RMAs have 50 or fewer clients over 6 months and a majority work 30 hours or more.

**Table 23: Target group cross-tabulation of hours worked in a week by number of clients advised in past 6 months – counts only**

Hours worked a week → Clients advised ↓	< 10 hrs	10 - 19 hrs	20 - 29 hrs	30 - 39 hrs	40 hrs +	Row total
Less than 10	79	55	35	25	15	209
10 to 50	27	65	76	105	146	419
51 to 100	2	9	7	35	92	145
101 to 200	0	0	4	6	41	51
More than 200	0	0	3	4	30	37
<b>Column total</b>	<b>108</b>	<b>129</b>	<b>125</b>	<b>175</b>	<b>324</b>	<b>861</b>

A vast majority of migration agents in the target group work for or own a profit-based business.

Target group - type of migration agent business  
% respondents in each category n=888

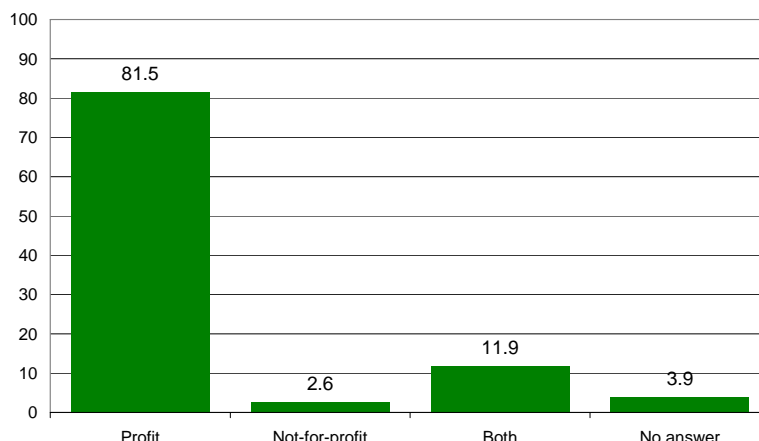


Table 24 displays a cross tabulation of migration agent entry pathway by employment status. It indicates that just over 50% of all migration agents have a graduate certificate in migration law and practice, while fewer than 30% have become agents through the MAPKEE pathway. Employers in the target group are less likely than all other groups to have used the graduate certificate or MAPKEE pathway.

A majority of target group RMAs are sole operators (work for themselves and employ no one else) and are also more likely to have used the graduate certificate pathway compared with all other employment status categories. Later analysis examines sole operators in more detail.

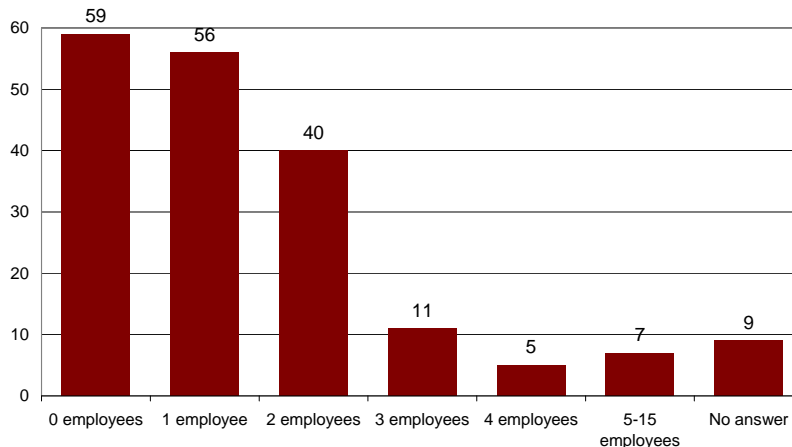
Just under 13% are migration agents as well as employers of other migration agents, while just over 23% work for someone else (employees and contractors / casuals). ASR has no further information about what constitutes the *other* employment status category.

Table 24: Entry pathway by employment status

Employment status →	Employee		Casual / contractor employee		Work for self and employ no RMAs		Own business -employ RMAs		Other		Row total	
	n	Col %	n	Col %	n	Col %	n	Col %	n	Col %	Row n	Row %
Grad Cert MLP	87	50.9	14	45.2	273	56.1	41	36.9	33	47.1	448	51.5
MAPKEE	55	32.2	12	38.7	127	26.1	38	34.2	16	22.9	248	28.5
Other	29	17.0	5	16.1	87	17.9	32	28.8	21	30.0	174	20.0
<b>Column total</b>	<b>171</b>	<b>100.0</b>	<b>31</b>	<b>100.0</b>	<b>487</b>	<b>100.0</b>	<b>111</b>	<b>100.0</b>	<b>70</b>	<b>100.0</b>	<b>870</b>	<b>100.0</b>
<b>Employment status (row %)</b>		<b>19.7</b>		<b>3.6</b>		<b>56.0</b>		<b>12.8</b>		<b>8.0</b>		<b>100.0</b>

Those respondents in the target group who indicated that they employed other migration agents or worked in the *other* category were asked how many RMA's they employed. In total, 115 indicated that they were employers and 72 indicated *other* employment status. So 187 people were presented with the question about number of RMA's employed. While 59 indicated that they employed no-one (and 48 of these were from the *other* category), most commonly an employer only employs 1 or 2 other agents (n=96 employers). Seven employers employ from 5 to 15 RMA's.

Target group - number of RMA's employed  
No of employers in each category n=187 respondents



When the number of employees is examined by type of business, most work in profit-based businesses – see table 25. The total numbers were supplied by 119 RMA's who answered the question about numbers of people employed.

Table 25: Type of business by number of RMA's employed

Type of business n=119 employers	Number of RMA's employed
Not-for-profit	23
Profit	724
Both	106

It is important to note that table 25 does not present the total number of RMA's employed in these types of business but only the total number of RMA's employed by people in the target group who employ other RMA's.

### Target group clients

As a general qualification, conclusions about all clients of RMA's should NOT be drawn from these findings. The results below are only about clients of target group RMA's. In presenting the results, we have continued the comparison of sole operators with the rest of the target group.

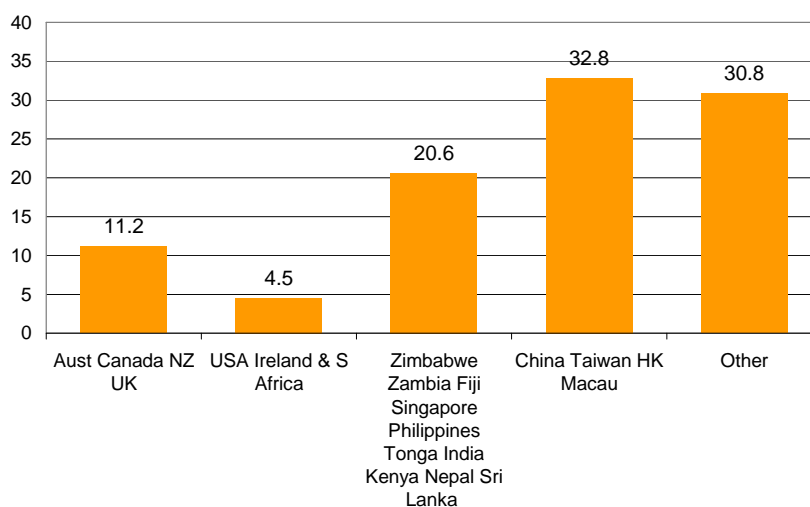
The target group as a whole most commonly provides advice about general skilled migration visas, followed by partner migration visas. For the question analysed in table 26, respondents could choose multiple answers about the common visa types so the answer percentages add to more than 100%. Percentages are calculated on a base of n=888.

**Table 26: Target group - most common visa types advised about**

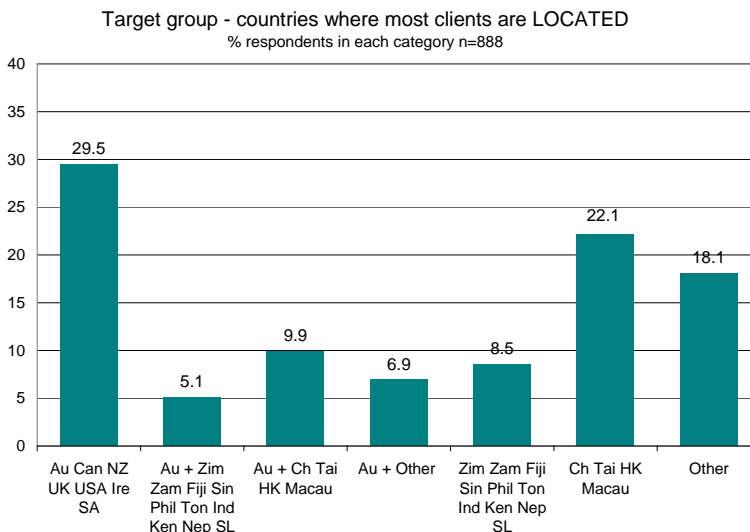
Visa type	Percentage n=888
General Skilled Migration	79.5
Partner Migration	68.9
Employer Sponsored Migration	55.6
Students	55.5
Parent Migration	42.7
Business Skills Entry	36.4
Other Family Migration	28.3
Citizenship or Appeals or Review	15.0
Child Migration	13.1
Onshore Protection	4.7
Humanitarian Offshore	3.3
Other	5.0

Overall, Chinese-speaking countries are the most common countries of birth of clients, closely followed by the other group – a similar pattern to their own countries of birth.

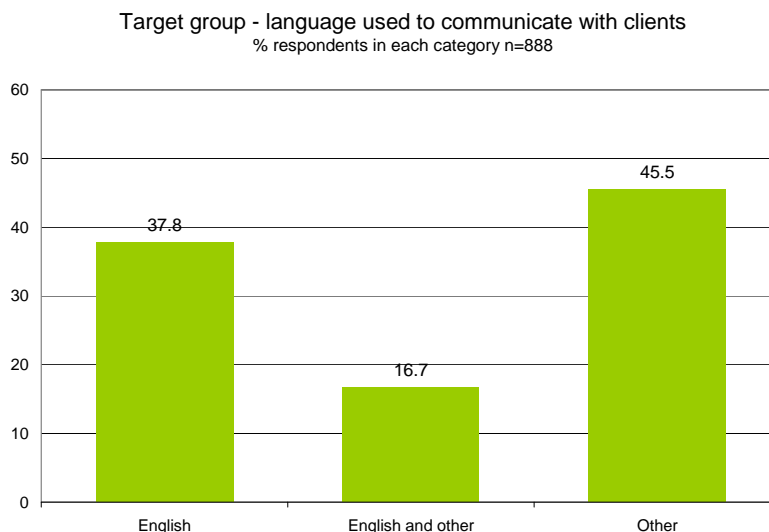
**Target group - clients' most common country of birth**  
% respondents in each category n=888



Predominantly, clients are located in Australia and other English-speaking countries for the entire target group, but a substantial proportion are also located in Chinese-speaking countries. Sole operators' clients are less likely to be located in Australia and slightly more likely to be located in *other* countries.



The target group as a whole uses a mixture of languages to communicate with their clients. Sole operators are less likely to use English and therefore more likely to use an *other* language to communicate with their clients, compared with the rest of the target group.



About 70% of the entire target group use interpreters less than 25% of the time with their clients. The use of interpreters does not differ when analysed by employment status.

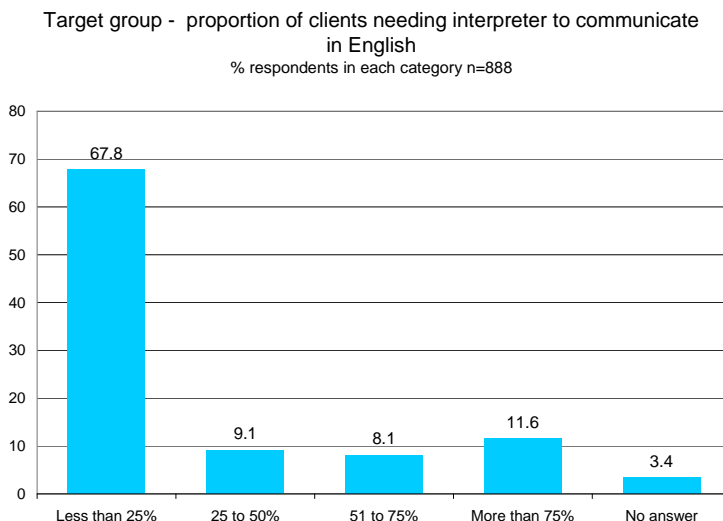


Table 27 displays a cross tabulation of certain types of businesses within the target group by RMAs' clients' countries of birth. There are very few not-for-profit businesses. Those that are both not-for-profit and profit-based businesses most commonly have clients from *other* countries.

**Table 27: Type of business by number of RMAs employed – counts only**

Client's country of birth	Type of business own or work for		
	Not-for-profit	Both NFP and profit	Row total
Australia, Canada, NZ and UK	3	7	10
USA, Ireland and South Africa	1	2	3
Zimbabwe, Zambia, Fiji, Singapore Philippines, Tonga, India, Kenya, Nepal, Sri Lanka	3	31	34
China, Taiwan, HK, Macau	4	28	32
Other	8	36	44
<b>Column total</b>	<b>19</b>	<b>104</b>	<b>123</b>

### Target group comments

The comments reflect the answers from 888 respondents and nearly all answered – an unusual response for free text comments where commonly only around 30% of respondents provide an answer.

### Impact on you personally

The most common theme was that there would be no impact – and this is highly predictable as around 60% of the target group indicated that they would meet the proposed language requirement. However, 495 comments were negative with a focus on inconvenience, pressure and losing income / occupation.



**Table 28: Comments of target group about impact on them personally**

Positive	Count	Neutral	Count	Negative	Count
Appreciate new changes, will adapt, increase motivation, it's better for me	32	No effect / impact, nothing	249	Increased time required, more pressure and stress, less time for clients	156
		Unnecessary, should be exempt as a result of experience and time in Australia	108	I will change profession / loose my job and income / business will close / lose registration	135
		Not applicable (respondent's answer did not match the question asked)	15	Increased financial burden / cost	58
		Unsure / don't know	14	Inconvenient	18
				Insults me and my abilities	14
				Discriminatory	6

### Impact on the business you own or work for

Again, most respondents who were asked the question answered. And again, the most common response was *no impact*. There were slightly more negative than positive answers when compared with the previous question, and the themes are very similar. For this question there are more negative comments when compared with the previous question about loss of business and change of careers.

**Table 29: Comments of target group about impact on their business**

Positive	Count	Neutral	Count	Negative	Count
It will benefit the business / industry / increased professionalism / higher service and advice standards	44	No effect / impact, nothing	308	My business will close / I will leave the industry if changes are implemented	150
		Not applicable (respondent's answer did not match the question asked)	41	Waste of time, reduces time available to work with clients, puts added stress and pressures on agents	82
		Unnecessary / people of high experience (in terms of years served) and qualifications should be exempt	21	Increased cost of business operation / will reduce revenue	76
		Unsure / don't know	16	The business will suffer greatly / loss of employees / they will have to start new careers	35
				The change is inconvenient	4

## Impact on the immigration advice industry serving Australia

There were 203 positive comments about improving the industry and making it more professional and efficient, balanced by 209 negative comments which focused on less diversity and possibly more difficulties for clients, while 103 indicated no impact.

**Table 30: Comments of target group about impact on the immigration advice industry**

Positive	Count	Neutral	Count	Negative	Count
It will benefit the industry, higher service and advice standards and improved reputation	131	No change, no effect, no impact	103	Experienced or professional agents with good skills but with poorer English skills will be forced to leave industry / will eliminate very poor English speaking agents	113
Will create a higher qualified agent work force in the industry	34	Not applicable (respondent's answer did not match the question asked)	79	Reduction in number of bi-lingual agents / will make serving clients with specific language requirements harder	40
Will improve communication as whole / better explanations to clients / more efficient communication with DIAC	21	Unsure / don't know	14	Negative effect on the industry / will be seen as discriminatory	37
The industry will become more professional in its operations and conduct	17			More agents will work unregistered if they fail / will force clients to seek overseas or unregistered agents if they cannot find a registered one who can speak their language	13
				Less cultural diversity in the industry	3
				Makes it harder for clients and businesses as a result of increased costs	3

## Impact on your clients

A large majority of the comments focused on no client impact.

**Table 31: Comments of target group about impact on their clients**

Positive	Count	Neutral	Count	Negative	Count
Positive impact, increased business, greater service, professionalism and higher standards offered to clients	79	No effect / impact, nothing	436	Clients don't speak English / they need agents who speak their language / will be difficult for clients if these agents are not in business as a result	167
		Not applicable (respondent's answer did not match the question asked)	14	Greater financial costs to client	35
		Unsure / don't know	9	Clients are worse off because of reduced time to work on case load, as a result of higher admin, study and testing for IELTS	20
				Fewer migrants to Australia / will go elsewhere	4

## Comments from all other respondents

The following comments are from respondents (n=1130) who met the conditions for the proposed English language requirements. Note that some of these respondents may be employers of RMAs who may not meet the proposed requirements.

### *Impact on the business you own or work for*

There was a majority neutral/positive response but with 296 negative responses. Over 80 indicated negative business impacts, even though they, individually, were not required to meet the proposed language requirements.

Positive	Count	Neutral	Count	Negative	Count
It will benefit the business / industry / increased professionalism / higher service and advice standards	105	No change / impact, nothing	570	Increased cost of business operation / will reduce revenue	83
		Not applicable (respondent's answer did not match the question asked)	66	Waste of time / reduces time available to work with clients / puts added stress and pressures on agents	78
		Unsure / don't know	10	My business will close / I intend to leave the industry should changes be implemented	48
				Unnecessary / people of high experience (in terms of years served) and qualifications should be exempt	39
				The business will suffer greatly / loss of employees / they will have to start new careers	34
				The change is inconvenient	14

### *Impact on the immigration advice industry serving Australia*

Generally, the sentiment is positive and a lower number are neutral (no impact). A small number have issues with servicing particular client groups.

Positive	Count	Neutral	Count	Negative	Count
It will benefit the business / industry / increased professionalism / higher service and advice standards	407	No change / impact, nothing	143	Reduction in bi-lingual agents, will make serving clients with specific language requirements harder	43
Experienced or professional agents with good skills but with poorer English skills will be forced to leave industry / will eliminate very poor English speaking agents	123	Not applicable (respondent's answer did not match the question asked)	119	This will have a negative effect on the industry / it will be seen as discriminatory	25
Will create a higher qualified agent work force in the industry	40	Unsure / don't know	15	More agents will work unregistered if they fail / will force clients to seek overseas or unregistered agents if they cannot find a registered one who can speak their language	22
Will improve communication as whole, better explanations to clients, more efficient communication with DIAC	38			Makes it harder for clients and businesses as a result of increased costs	12
The industry will become more professional in its operations and conduct	34				

### Impact on your clients

Comments were overwhelmingly neutral or positive, but again, the negative comments focused on not being able to meet some clients' needs.

Positive	Count	Neutral	Count	Negative	Count
Positive impact, increased business, greater service, professionalism and higher standards offered to clients	224	No change / impact, nothing	591	Clients don't speak English / they need agents who speak their language / will be difficult for clients if these agents are not in business as a result	119
		Not applicable (respondent's answer did not match the question asked)	28	Greater financial costs to client	32
		Unsure / don't know	15	Clients are worse off because of reduced time to work on case load, as a result of higher admin, study and testing for IELTS	16
				Fewer migrants to Australia / will go elsewhere	3

## Conclusions

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1. Approximately 17% of the population of RMAs may be affected by the proposed English language change.
2. Many of these affected are Chinese-speaking or come from a range of European and Middle-Eastern countries as well as the Indian sub-continent. A number also come from Korea.
3. Most are well educated, but not in English. Those negatively affected by the proposed change have fairly similar work patterns to those who are not affected.
4. Some of those negatively affected say that they will leave the industry but a higher proportion is uncertain of their future.
5. Some employers of migration agents will be negatively affected, but other migration agents indicate that they will be busier as a result.
6. A majority of the immigration advice industry view the proposed change as having a positive impact on the industry indicating that it will improve service standards and professionalism in the industry. Most believe that the proposed changes will have no or neutral impact on their clients.
7. Some affected RMAs believe that the proposed change will reduce diversity and that some particular client groups may not have access to agents who can service them adequately. ASR has found no evidence from this survey to support this view.

## Appendix A: Sample profile

Population figures have been sourced directly from OMARA data. The results show that for the total response set – those people who answered at least one question in the questionnaire - all demographic sub-group distributions follow a very similar pattern to the population distributions, except for those who are legally qualified – and there may be some confusion in the RMA population about the meaning of this term. The overall pattern of respondents indicates a well-represented and unbiased sample.

The target group profile refers to the RMAs who were the focus of the survey and who are potentially most affected by the proposed changes to English language requirements re re-registration. On most demographics all profiles follow a very similar pattern, accept there are many fewer legally qualified RMAs in the target group and slightly fewer Australian citizens in this group as well.

Age	Target group		Sample		Population	
	Frequency	%	Frequency	%	Frequency	%
21-34 years	192	21.6	431	21.4	1132	25.3
35-40 years	204	23.0	379	18.8	850	19.0
41-47 years	193	21.7	412	20.4	888	19.9
48-55 years	162	18.2	398	19.7	828	18.5
56-78 years	121	13.6	396	19.6	763	17.1
No answer	15	1.7	2	.1	6	.1
Total	888	100.0	2018	100.0	4467	100.0

Residence type	Target group		Sample		Population	
	Frequency	%	Frequency	%	Frequency	%
Australian	718	80.9	1741	86.2	3886	87.0
New Zealand	4	0.5	12	.6	35	.8
Permanent Resident	151	17.0	265	13.1	546	12.2
No answer	15	1.7				
Total	888	100.0	2018	100.0	4467	100.0

Legally qualified	Target group		Sample		Population	
	Frequency	%	Frequency	%	Frequency	%
Yes	6	0.7	310	15.4	1025	22.9
No	867	97.6	1708	84.6	3442	77.1
No answer	15	1.7				
Total	888	100.0	2018	100.0	4467	100.0

No win no fee	Target group		Sample		Population	
	Frequency	%	Frequency	%	Frequency	%
Yes	4	0.5	7	.3	10	.2
No	869	97.9	2011	99.7	4457	99.8
No answer	15	1.7				
Total	888	100.0	2018	100.0	4467	100.0

Length of time registered	Target group		Sample		Population	
	Frequency	%	Frequency	%	Frequency	%
Up to one year	169	19.0	372	18.4	931	20.8
One to 2 years	187	21.1	447	22.2	981	22.0
Over 2 to 6 years	251	28.3	508	25.2	1089	24.4
Over 6 to 9 years	135	15.2	313	15.5	656	14.7
Over 9 years	131	14.8	378	18.7	810	18.1
No answer	15	1.7				
<b>Total</b>	<b>888</b>	<b>100.0</b>	<b>2018</b>	<b>100.0</b>	<b>4467</b>	<b>100.0</b>

Australian state	Target group		Sample		Population	
	Frequency	%	Frequency	%	Frequency	%
ACT	13	1.5	38	1.9	75	1.7
NSW	342	38.5	783	38.8	1855	41.5
NT	3	0.3	12	.6	17	.4
QLD	114	12.8	264	13.1	532	11.9
SA	37	4.2	70	3.5	165	3.7
TAS	4	0.5	10	.5	20	.4
VIC	249	28.0	575	28.5	1287	28.8
WA	67	7.5	180	8.9	365	8.2
Other	1	0.1	1	.0	1	.0
No answer	58	6.5	85	4.2	150	3.4
<b>Total</b>	<b>888</b>	<b>100.0</b>	<b>2018</b>	<b>100.0</b>	<b>4467</b>	<b>100.0</b>

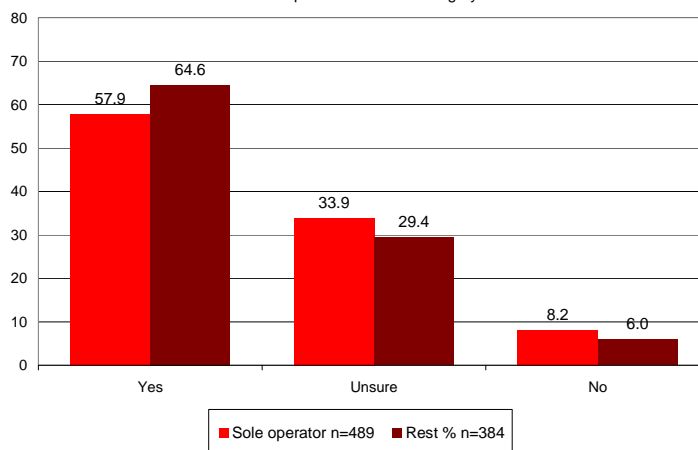


## Appendix B: Sole operator analysis

People who work for themselves and do not employ other migration agents (whom we have termed *sole operators*) comprise 56% of the target group and most likely have used the graduate certificate pathway to become a registered migration agent. In the following analysis the *rest* category comprises *employees, casuals/contractors, employers* and *other* employment status groups.

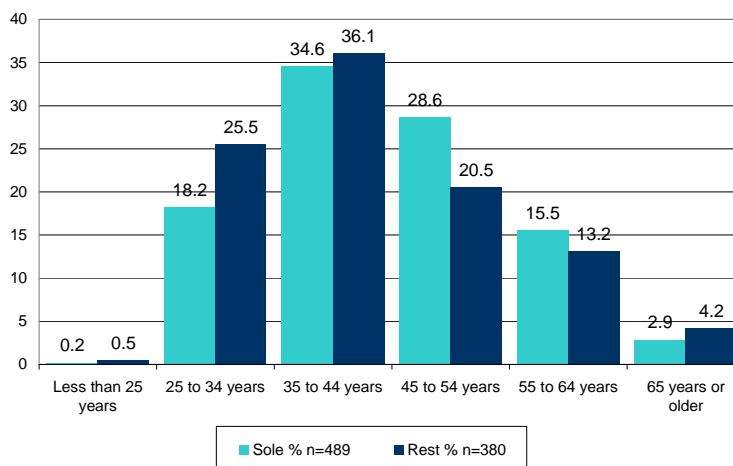
Sole operators indicate that they are slightly less likely to meet the proposed requirements compared with the rest of the target group.

Sole operator and rest of target group -  
 "Do you think you would meet the [proposed] language requirement based on your current level of English?"  
 % respondents in each category

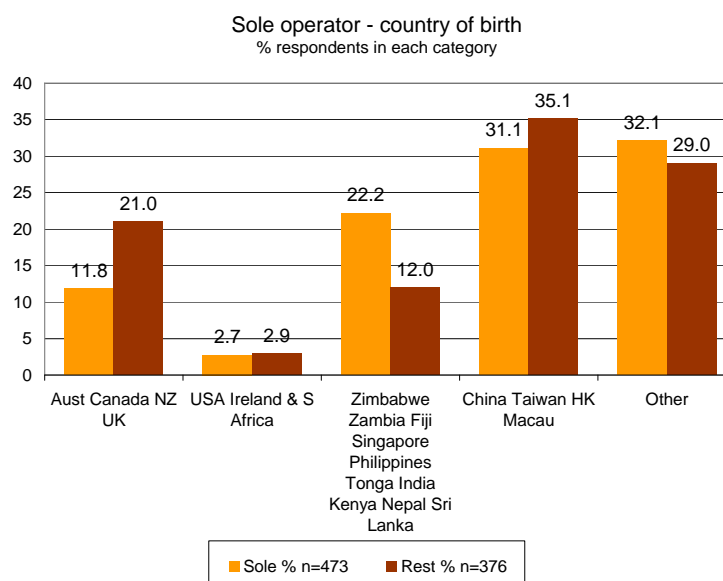


In terms of age, sole operators follow a very similar pattern to the rest of the target group but there is a higher proportion of people in the 45-54 year age range. As with the rest of the target group, sole operators are most commonly in the 35-44 year age range.

Sole operator - age ranges  
 % respondents in each category



Sole operators are more likely to have been born in the *mixed* group of countries (Zimbabwe, etc) and are less likely to be from the *Australia, etc* group.

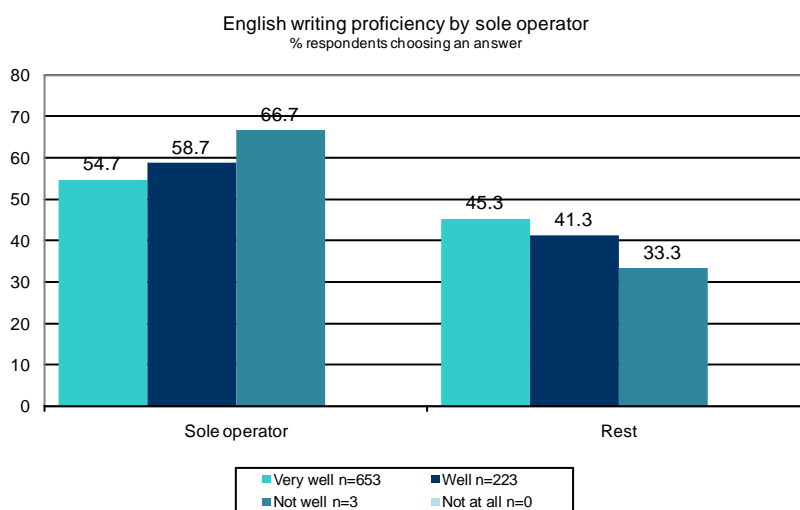
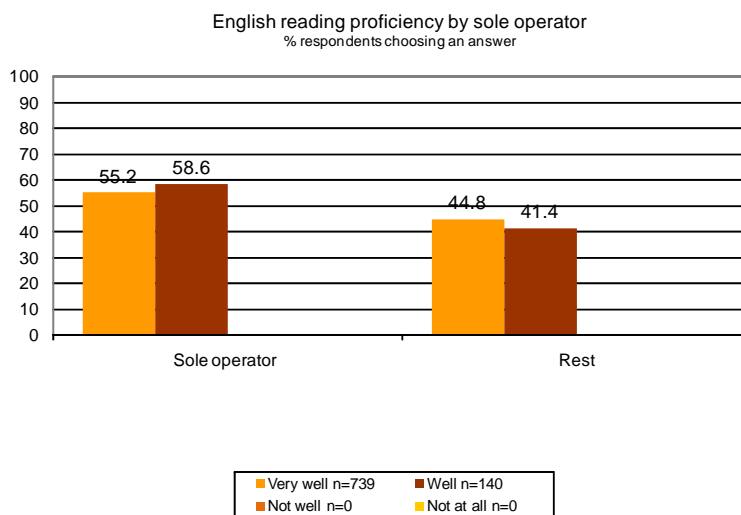
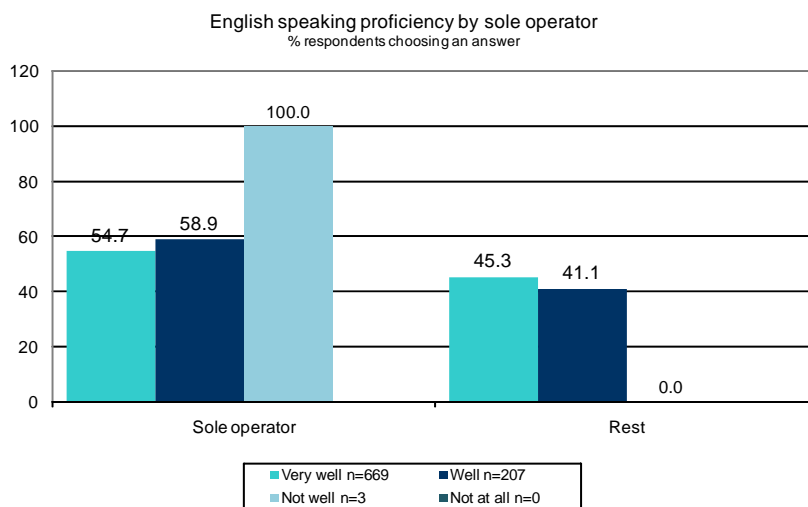


English is the predominant language spoken at home for both sole operators and the rest of the target group. A slightly lower proportion of sole operators speak English and Chinese compared with the rest of the group (note similar absolute numbers), while a slightly higher proportion of sole operators speak *other* languages. This aligns with the higher proportion of *varied* countries of birth of the sole operator category. Table A1 is sorted by sole operator percentage.

**Table A1 Language spoken at home – sole operators compared with rest of target group**

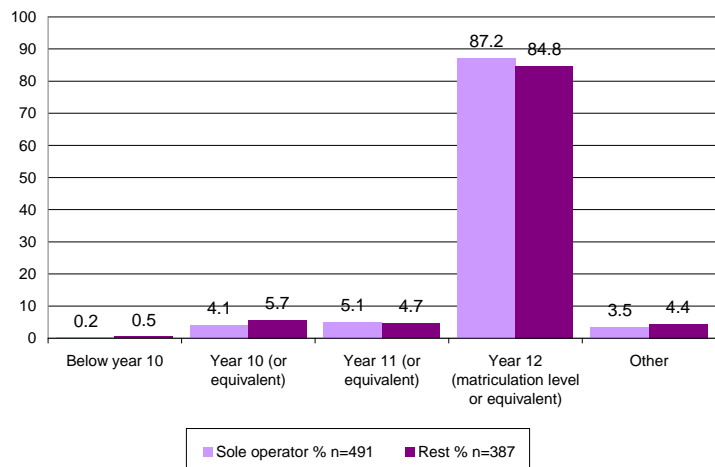
Language spoken at home	Sole operator		Rest	
	n	%	n	%
English	216	44.3	195	50.3
Mandarin / Cantonese	123	25.2	108	27.8
Other	72	14.8	39	10.1
Korean	23	4.7	18	4.6
Arabic	9	1.8	1	0.3
Russian	9	1.8	3	0.8
Sinhalese	7	1.4	0	0.0
Vietnamese	6	1.2	4	1.0
Hindi	6	1.2	5	1.3
Indonesian	4	0.8	2	0.5
Nepali	3	0.6	0	0.0
Urdu	3	0.6	1	0.3
Spanish	2	0.4	5	1.3
Tamil	2	0.4	2	0.5
Tagalog	2	0.4	3	0.8
Italian	1	0.2	0	0.0
Greek	0	0.0	0	0.0
Serbian	0	0.0	1	0.3
Croatian	0	0.0	1	0.3
<b>Total</b>	<b>488</b>	<b>100.0</b>	<b>388</b>	<b>100.0</b>

English speaking, reading and writing proficiencies are very similar when comparing sole operators and the rest of the target group. Speaking proficiency is slightly lower than reading and writing proficiencies for both employment status groups.



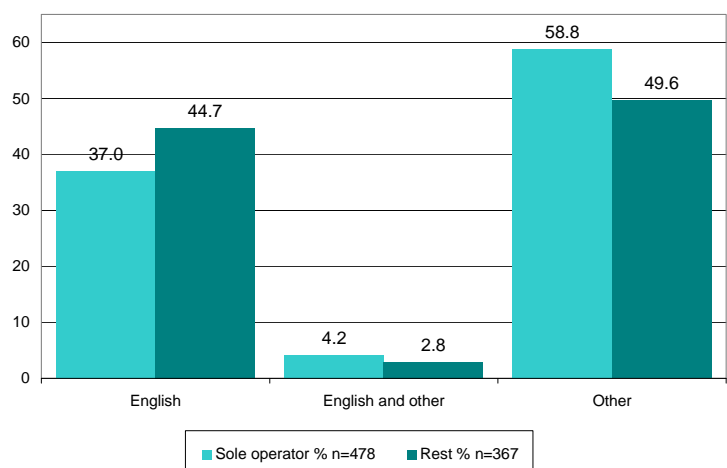
Secondary schooling levels are very similar for both groups.

Sole operator - highest level of secondary education  
% respondents in each category



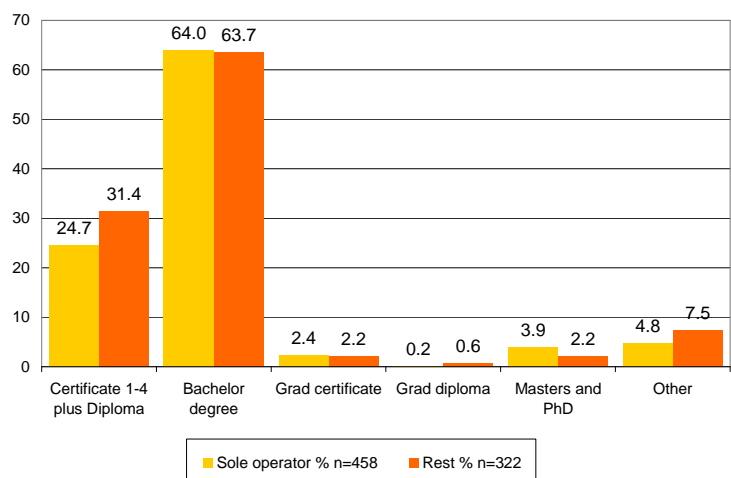
Following the pattern of country of birth, a majority of sole operators were instructed in a language other than English for their secondary education. This is a somewhat higher proportion when compared with the rest of the target group.

Sole operator - language of instruction of secondary education  
% respondents in each category



Nearly all people working as sole operators have a post-secondary qualification. This chart shows the first qualification of the sole operators and rest of the target group. There are few differences between the two groups.

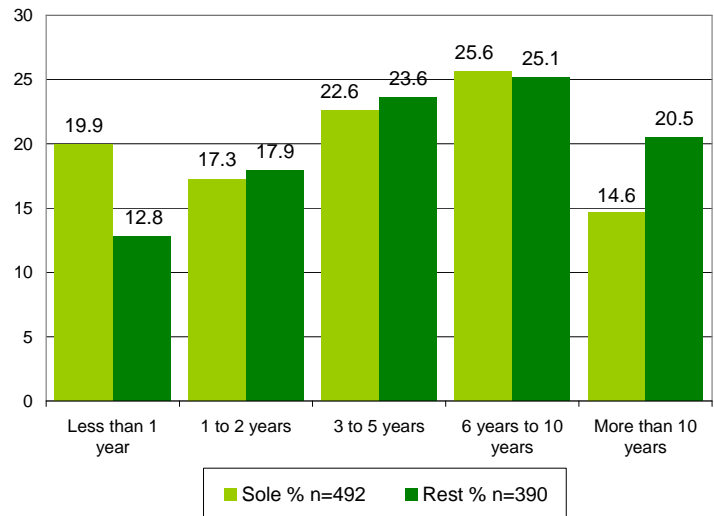
Sole operator - first post-secondary qualification  
% respondents in each category



Just over 40% (n=201) of sole operators report that they have a graduate diploma, masters or PhD degree in addition to their first post-secondary qualification and over 70% of these higher qualifications were obtained in Australia, Canada, New Zealand or the UK.

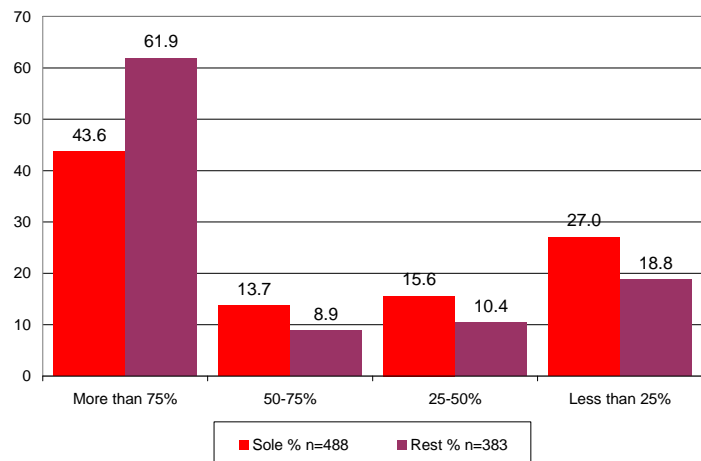
The distribution of categories of length of time registered as a migration agent is fairly even across all time ranges. However, compared with the rest of the target group, there are more new sole operators RMAs (less than 1 year of registration) and fewer sole operators who have been registered for more than 10 years.

Sole operator - years working in migration advice industry  
% respondents in each category



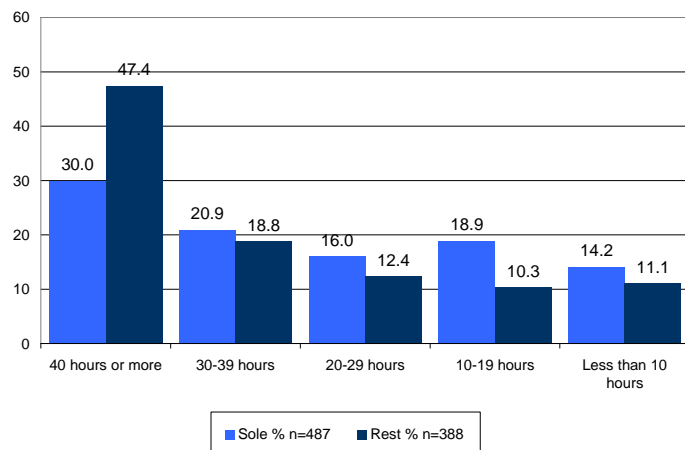
Most commonly sole operators earn most of their income as a migration agent. But they are far less likely to earn most of their income as a migration agent compared with the rest of the target group and proportionately more likely to be earning only part of their income as a migration agent, particularly earning less than 25% of their income from the profession.

Sole operator - proportion of income earned working as migration agent  
% respondents in each category



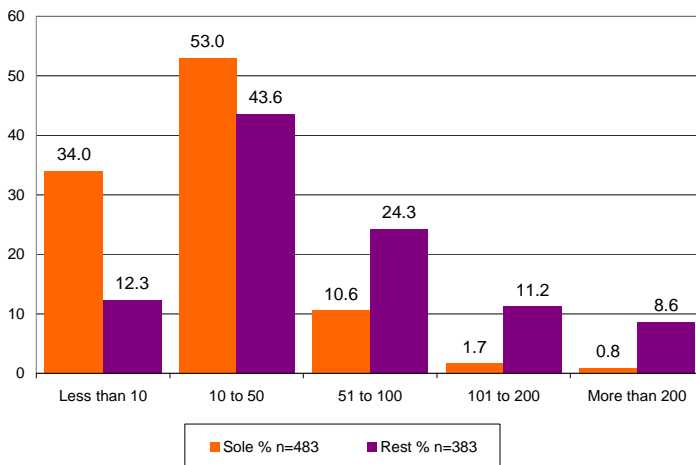
Only 30% of sole operators work 40 hours or more a week as a migration agent – which follows the pattern of the previous chart. Around 50% work around full-time.

Sole operator - hours per week worked as migration agent  
% respondents in each category



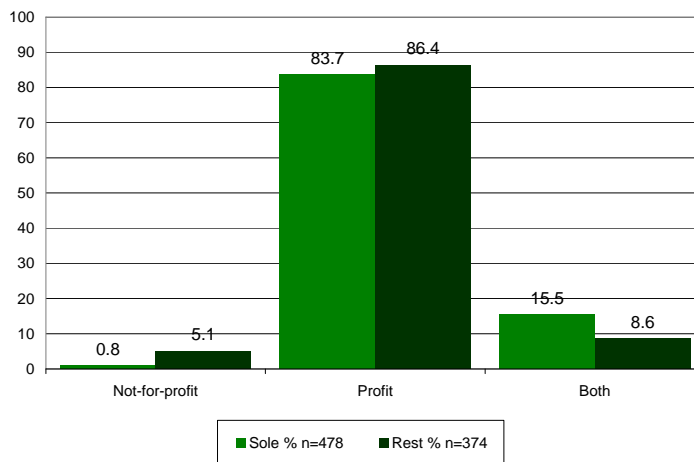
Sole operators are more likely to service fewer clients than the rest of the target group in the past 6 months. This finding aligns with working fewer hours and not earning as much of their income from being a migration agent, compared with the rest of the target group.

Sole operator - number of personal clients in past six months  
% respondents in each category



Predominantly, sole operators are likely to be working for profit, but a higher proportion than the rest of the target group work both for profit and not-for-profit.

Sole operator - type of migration agent business  
% respondents in each category



## Appendix C: Additional comment analysis

### Affected and target group comments compared

#### *Impact on you personally*

	Positive comments		Neutral comments		Negative comments			
	Target	Affected	Target	Affected	Target	Affected		
Appreciate new changes, will adapt, increase motivation, it's better for me	32	11	No effect / impact, nothing	249	26	Increased time required, more pressure and stress, less time for clients	156	117
			Unnecessary, should be exempt as a result of experience and time in Australia	108	32	I will change profession / lose my job and income / business will close / lose registration	135	77
			Not applicable (respondent's answer did not match the question asked)	15	10	Increased financial burden / cost	58	16
			Unsure / don't know	14	9	Inconvenient	18	3
						Insults me and my abilities	14	5
						Discriminatory	6	1

*Impact on the business you own or work for*

	Positive comments		Neutral comments		Negative comments			
	Target	Affected	Target	Affected	Target	Affected		
It will benefit the business / industry / increased professionalism / higher service and advice standards	44	7	No effect / impact, nothing	308	41	My business will close / I will leave the industry if changes are implemented	150	133
			Not applicable (respondent's answer did not match the question asked)	41	21	Waste of time, reduces time available to work with clients, puts added stress and pressures on agents	82	30
			Unnecessary / people of high experience (in terms of years served) and qualifications should be exempt	21	12	Increased cost of business operation / will reduce revenue	76	30
			Unsure / don't know	16	11	The business will suffer greatly / loss of employees / they will have to start new careers	35	16
						The change is inconvenient	4	



## Impact on the immigration advice industry serving Australia

	Positive comments			Neutral comments			Negative comments	
	Target	Affected		Target	Affected		Target	Affected
It will benefit the industry, higher service and advice standards and improved reputation	131	21	No effect / impact, nothing	103	31	Experienced or professional agents with good skills but with poorer English skills will be forced to leave industry / will eliminate very poor English speaking agents	113	60
Will create a higher qualified agent work force in the industry	34	9	Not applicable (respondent's answer did not match the question asked)	79	35	Reduction in number of bi-lingual agents / will make serving clients with specific language requirements harder	40	34
Will improve communication as whole / better explanations to clients / more efficient communication with DIAC	21	0	Unsure / don't know	14	6	Negative effect on the industry / will be seen as discriminatory	37	19
The industry will become more professional in its operations and conduct	17	2				More agents will work unregistered if they fail / will force clients to seek overseas or unregistered agents if they cannot find a registered one who can speak their language	13	3
						Less cultural diversity in the industry	3	1
						Makes it harder for clients and businesses as a result of increased costs	3	3

## Impact on your clients

Positive	Positive comments		Neutral comments		Negative comments			
	Target	Affected	Neutral	Target	Affected	Negative	Target	Affected
Positive impact, increased business, greater service, professionalism and higher standards offered to clients	79	11	No effect / impact, nothing	436	101	Clients don't speak English / they need agents who speak their language / will be difficult for clients if these agents are not in business as a result	167	132
			Not applicable (respondent's answer did not match the question asked)	14	4	Greater financial costs to client	35	26
			Unsure / don't know	9	3	Clients are worse off because of reduced time to work on case load, as a result of higher admin, study and testing for IELTS	20	10
						Fewer migrants to Australia / will go elsewhere	4	4

# All comments

## *Impact on the business you own or work for*

Positive	Count	Neutral	Count	Negative	Count
It will benefit the business / industry / increased professionalism / higher service and advice standards	149	No effect / impact, nothing	878	My business will close / I will leave the industry if changes are implemented	198
		Not applicable (respondent's answer did not match the question asked)	107	Waste of time, reduces time available to work with clients, puts added stress and pressures on agents	160
		Unnecessary / people of high experience (in terms of years served) and qualifications should be exempt	60	Increased cost of business operation / will reduce revenue	159
		Unsure / don't know	26	The business will suffer greatly / loss of employees / they will have to start new careers	69

## Impact on the immigration advice industry serving Australia

Positive	Count	Neutral	Count	Negative	Count
It will benefit the industry, higher service and advice standards and improved reputation	538	Not applicable (respondent's answer did not match the question asked)	198	Experienced or professional agents with good skills but with poorer English skills will be forced to leave industry / will eliminate very poor English speaking agents	236
Will create a higher qualified agent work force in the industry	74	No effect / impact, nothing	246	Reduction in number of bi-lingual agents / will make serving clients with specific language requirements harder	83
Will improve communication as whole / better explanations to clients / more efficient communication with DIAC	59	Unsure / don't know	29	Negative effect on the industry / will be seen as discriminatory	62
The industry will become more professional in its operations and conduct	51			More agents will work unregistered if they fail / will force clients to seek overseas or unregistered agents if they cannot find a registered one who can speak their language	28
				Makes it harder for clients and businesses as a result of increased costs	15
				Less cultural diversity in the industry	3

### *Impact on your clients*

Positive	Count	Neutral	Count	Negative	Count
Positive impact, increased business, greater service, professionalism and higher standards offered to clients	303	No effect / impact, nothing	1027	Clients don't speak English / they need agents who speak their language / will be difficult for clients if these agents are not in business as a result	286
		Not applicable (respondent's answer did not match the question asked)	42	Greater financial costs to client	67
		Unsure / don't know	24	Clients are worse off because of reduced time to work on case load, as a result of higher admin, study and testing for IELTS	36
				Fewer migrants to Australia / will go elsewhere	7

## Appendix D: Web questionnaire

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