



Friday, 26 September 2025

Jobs and Skills Australia  
Department of Employment and Workplace Relations  
[Via online portal](#)

## 2025 Core Skills Occupation List Consultations

Chartered Accountants Australia and New Zealand (CA ANZ) welcomes the opportunity to make a submission to Jobs and Skills Australia (JSA) on the 2025 Core Skills Occupation List (CSOL) Consultations.

We make this submission on behalf of our members and in the public interest, bringing multiple perspectives:

- as the region's peak body for the accounting profession, representing accounting and finance professionals in occupations across all industries and employers of all sizes
- as a skilled migration assessing authority for accounting occupations
- as a professional accrediting body and TEQSA registered provider of higher education
- as a provider of professional programs and continuous professional development offerings
- as public interest advocates for a resilient economy and a skilled and adaptable workforce.

Our response builds on CA ANZ's [joint submission](#) to JSA on the Draft CSOL in June 2024 and our [submission](#) to JSA on the Occupation Shortage List Stakeholder Survey in March this year.

This submission contains analysis, research and insights from our engagement with accounting, audit and finance professionals, employers and other industry stakeholders.

We provide feedback on key occupations relevant to the profession and responses from our members to the External Auditor case study in JSA's 2024 CSOL Key Findings Report. CA ANZ will arrange a time to discuss the issues raised in this case study with JSA's CSOL consultations team.

## Recommendations

CA ANZ's recommendations to JSA are:

### 1. Retain the following occupations on the CSOL:

- Taxation Accountant
- Accountant (General)
- Management Accountant
- External Auditor
- Internal Auditor
- Finance Manager
- Management Consultant
- ICT Business Analyst
- Cyber Security Advice and Assessment Specialist
- Cyber Security Engineer

- Cyber Security Analyst
- Cyber Security Architect
- Cyber Security Operations Coordinator.

**2. Add the following occupations to the CSOL:**

- Forensic Accountant
- Data Architect
- Data Engineer
- Information and Organisation Professionals nec#

**3. Do not add Financial Adviser to the CSOL.**

**Appendix A** contains our detailed comments.

**Appendix B** contains our online survey response on the Forensic Accounting occupation.

**Appendix C** contains our online survey response on the Financial Adviser occupation.

**Appendix D** contains further information about CA ANZ.

If you have any questions or would like to discuss our views, please contact [REDACTED]

Sincerely,

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

[REDACTED]

# Appendix A

## 2025 CSOL Consultations

### 1. Occupations of interest in 2024

CA ANZ [welcomed the inclusion](#) of tax accountants and auditors on the Occupation Shortage List (OSL) in October last year, following our submission on the 2024 Skills Priority List Stakeholder Survey. Our [submission](#) to JSA on the 2025 Occupation Shortage List Survey in March this year included our member survey results which found national, state and territory shortages across the eight occupations surveyed - Finance Manager, Accountant (General), Management Accountant, Taxation Accountant, Corporate Treasurer, External Auditor, Internal Auditor and Financial Investment Adviser.

These findings are still current and relevant as the OSL is one of the criteria for determining whether an occupation is recommended by JSA to be included on the 2025 CSOL.

Following our [joint submission](#) to JSA on the Draft CSOL in June 2024, CA ANZ [welcomed the inclusion](#) of the following accounting, audit and finance related occupations on the CSOL:

<a href="#">OSCA code</a>	
211135	Taxation Accountant
211131	Accountant (General)
211131	Management Accountant
211231	External Auditor
211232	Internal Auditor
111231	Finance Manager
N/A	Financial Investment Adviser
223432	Management Consultant
271132	Cyber Security Advice and Assessment Specialist
271133	Cyber Security Analyst
271134	Cyber Security Architect
271136	Cyber Security Operations Coordinator
273232	ICT Business Analyst

Most of our analysis and recommendations on these occupations are unchanged since last year.

We note that these occupations are not included in the group that JSA has targeted for consultation this year and will remain on the CSOL for 2025.

## 2. Occupations targeted for consultation in 2025

JSA's [2025 CSOL targeted for consultation group](#) includes the four occupations in the table below which are listed on the Occupation Standard Classification for Australia (OSCA).

<a href="#">OSCA code</a>	
211133	Forensic Accountant
223232	Data Architect
223233	Data Engineer
223999	Information and Organisation Professionals nec#

CA ANZ's consultation with our members has determined that migration is an appropriate path to address the skill shortages identified in these four occupations.

We provided detailed comments on the **Forensic Accountant** occupation in our online survey response to JSA on the 2025 CSOL Consultations which is also outlined in **Appendix B**.

While entry-level pathways are available for Australian workers to become Forensic Accountants, supply is falling short of demand. Adding this occupation to the CSOL will help address Australia's shortage of workers in this critical area which is experiencing strong growth driven by rising corporate fraud, money laundering, and other incidences of cybercrime and complex financial crimes, the impact of AI and technological developments, and increasingly stringent legal and regulatory requirements.

## 3. Occupations not targeted for consultation this year

While not part of the group targeted for consultation this year, CA ANZ provided a detailed online survey response to JSA on the **Financial Adviser** occupation (OSCA Code 212131) which is also outlined in **Appendix C**.

In summary, CA ANZ's position is that migration is not an appropriate path to address Australia's ongoing shortages of Financial Advisers at this time, particularly not via the CSOL.

Australians should be able to plan their retirement journey without hassle or complication. However, it can be difficult for people to understand how superannuation, taxation, age pension and aged care regulatory settings work together, and how to produce the best possible outcome over the long-term. This complexity has created a void where 11.8 million Australians are seeking advice, but there are not enough financial advisers to meet the demand.

Chartered Accountants are highly trained and skilled professionals who can solve this issue, but the regulatory environment needs urgent reform to allow CA ANZ members in public practice to support their clients with their everyday financial challenges. This can be achieved by amending the *Corporations Regulations 2001* to allow a qualified accountant, who is a member of a major accounting body, to provide strategic financial advice.

## 4. External Auditor case study

Jobs and Skills Australia's (JSA) [2024 CSOL Key Findings Report](#) noted on pages 13 to 14 that while the occupation of External Auditor was included on the 2024 CSOL, more compelling evidence could be provided in submissions from industry bodies on what is being done to:

- Invest in graduates and professional development to meet workforce needs, and
- Improve migrant employment outcomes.

CA ANZ obtained feedback from our members on these points which is outlined in this section of our submission. We also provide further insights from our members on the following issues to demonstrate the ongoing need for the External Auditor occupation to be retained on the CSOL:

- The likelihood of domestic supply from Australia's education and training sectors
- Employment outcomes for domestic graduates in the occupation
- Migrants' performance in the labour market upon arrival
- Retention of migrants in their nominated skilled occupation in the years after arrival
- Experiences with the Core Skills Stream of the Skills In Demand Visa
- Future demand.

We welcome the opportunity to discuss these issues further with JSA's CSOL consultations team.

### **How are our members investing in graduates and professional development to meet workforce needs?**

- Participating in activities at Australian universities to assist Accounting, Business and Commerce students and graduates with employability skills. This includes providing workshops on topics such as preparing CVs and job applications and preparing for interviews and assessment centres.
- Providing careers education workshops and opportunities to network with employers.
- Providing structured graduate development programs including technical training and support to complete a professional qualification, such as the Chartered Accountants (CA) Program, including offering study leave and financial assistance to cover program costs.
- Providing professional development including training in non-technical skills and capabilities such as personal productivity, leadership styles and brand, goal setting, and AI prompt engineering.
- Providing career pathways and progression opportunities.
- Providing international secondment opportunities.

### **What other activities are being undertaken to improve employment outcomes for migrants and graduates?**

#### **1. Does your organisation engage in any other activities which improve employment outcomes for migrants?**

- Providing a buddy program which includes being paired with another employee who made an international move to Australia 12 or more months ago to support them with integration into Australia. Training programs are available via internal training platforms such as Degreed.
- Improved employment outcomes for skilled migrants are demonstrated by stable and ongoing employment in roles that match their skills and qualifications, opportunities for career progression, and ensuring wage parity with their local peers. Permanent residency pathways are also considered for those who are eligible and satisfy the relevant requirements.
- Providing skilled migrants recruited for long-term roles with the same workforce training and development programs provided to all staff for their relevant level and role. Financial and educational support is provided.

- Our members emphasised that the opportunity to learn and develop skills is a critical factor in improving employment outcomes for all employees including migrants and graduates. In larger organisations, career agility and internal career mobility is also part of the value proposition. Staff are supported to explore diverse career opportunities and experiences.
- CA ANZ provides an [International Pathways Program](#), [Achiever program](#) and [career support services and resources](#) to assist both domestic and international graduate employment outcomes.

**2. Does your organisation engage in any other activities which improve employment outcomes for domestic graduates of accounting, management and commerce programs?**

- Training and development is available via internal training platforms, and domestic secondments which provided an opportunity to upskill and gain further experience.
- Several of Australia's largest professional service firms, BDO, Deloitte, EY, Grant Thornton, KPMG and PwC (large firms) are significant employers of Australian graduates and have invested heavily in recruiting, onboarding, training and developing auditors within Australia over many years. The large firms provide world-class training programs for Australian graduates and junior professionals. As part of their commitment to meet statutory requirements on quality and independence, these firms provide structured learning to audit staff that includes development of current and future skills. Each firm has curricula that focus on developing skills in both virtual and face to face classroom environments (where current regulations permit) and through simulated case studies led by experienced audit professionals. Transparency reporting by the large firms also shows in many cases that the investment made is significantly above the minimum requirement for professional development set by the professional accounting bodies. Other benefits these firms offer to attract and retain auditors include offering study leave and financial support to complete the CA ANZ or CPA Programs.

**3. Does your organisation engage in any other activities to improve employment outcomes in the external auditor occupation?**

- Many of our members actively engage with students at the high school level to encourage them to consider studying Accounting, Business and Commerce degrees to build the profession's talent pipeline. CA ANZ also undertakes similar activities with schools and universities and has developed high school toolkits, career cards and other resources to promote exciting career opportunities in accounting, audit and finance-related professions.
- CA ANZ and some of our members also offer [more flexible, accessible pathways](#) into accounting, audit and finance careers for both school leavers without a degree and those who may have a degree in a non-related area.

**4. Does your organisation measure improved employment outcomes for skilled migrants or domestic graduates? If so, are there any results you can share?**

- CA ANZ members measure improved employment outcomes for skilled migrants and domestic graduates in accounting, audit and finance-related roles in various ways including employer satisfaction surveys, graduate satisfaction surveys, graduate development program satisfaction surveys, graduate pathways surveys and national engagement surveys.

- An example of recent improvements in employment outcomes measured by our members was **“graduate engagement (which included skilled migrants and domestic graduates in external audit roles) improved by 4% between 2024 and 2025 following our graduate/early careers development program.”**
- The 2023 Winter cohort of CA ANZ's [Achiever program](#), which is open to penultimate and final year domestic and international students who are currently undertaking university studies in accounting, had **106 successful paid work experience placements from 1,099 applications**. The Summer cohort had **1,113 applications**.
- Until recently, CA ANZ, CPA Australia and the Institute of Public Accountants also offered the [Accounting Professional Year Program](#) (Accounting PY Program). It was achieving strong overall employment outcomes. **In 2023, 76% of Accounting PY Program graduates in employment were working in accounting roles**. The difficult decision to close the program resulted from a sharp decline in enrolments which can be partly attributed to the lack of response from government to the requests from the joint bodies to allow changes to modernise the program, as well as general uncertainty created by government immigration policy. New enrolments ceased in March this year and the program is scheduled to conclude all activity by May 2026.

#### Other factors relevant to determining if migration is an appropriate path

- 5. How long do migrants stay in their nominated skilled occupations in the years after arrival?**
  - Some members have advised that the average tenure for their graduates is two to three years, and usually until they become eligible for permanent residency, a process which is supported subject to various factors.
  - It is understood that graduates may leave the industry to pursue other business related roles. This leaves a significant skill gap in the mid-career level and contributes to high demand for skilled migrants in accounting, audit and finance-related roles.
- 6. How well do migrants do in the labour market upon arrival? Please provide comments relevant to the skilled occupations of interest.**
  - Migrants hired on skilled visa hired into occupations such as accounting, external audit and internal audit tend to integrate effectively into the workforce, contributing valuable expertise and filling critical skill shortages.
  - Many of our members report that skilled migrant workers, including external auditors and accountants, are equally as successful in their profession as domestic equivalent professionals.
- 7. What factors contribute to your organisation's decision to sponsor an applicant for a skilled visa?**
  - Our members have indicated various factors including the skills shortage, time to fill, lack of suitable applicants in the Australian market, particularly where a specialised skillset is required, and maturity of talent internationally.
  - There are instances where our members are unable to find a suitably skilled Australian candidate for a specific role despite prioritising sourcing talent locally. In such cases, they may

consider sponsoring an overseas applicant for a skilled visa. Key factors that contribute to this decision are:

- **Skills and experience:** The applicant possesses specialised skills, qualifications, or experience that are not readily available in the local labour market.
- **Business needs:** The role is important to the business, and timely recruitment is essential.
- **Visa eligibility:** The applicant meets the eligibility requirements for the relevant skilled visa subclass, including qualifications, English proficiency, and work experience.

**8. Do visa applicants or visa holders experience difficulties in having their qualifications recognised in any of the occupations of interest?**

- Some members have reported a small number of cases where recognition of qualifications in Australia has been difficult. In these cases, an applicants' overseas qualifications are from an institution that is not recognised on the Country Education Profiles (CEP) or their qualification is not recognised on the CEP as the equivalent of an Australian bachelor's degree.

**9. Are the employability, communication, or other soft skills of visa holders at a different level to Australian workers? If yes, please provide details and advise how you have addressed this.**

- The recruitment process helps to screen and assess employability, communication and other soft skills. The visa process also helps to assess these skills. While there can be instances where these skills are lacking (most prominent in dependent visa holders), the recruitment and visa processes help to minimise this.

**10. What other barriers are faced by skilled visa holders?**

- Common barriers can include a lack of support networks in the early stages of arrival, the cost of living, and being bound to an employer sponsorship.
- Visa-related constraints can be a barrier where conditions attached to the visa (such as location restrictions) affect job mobility and long-term career planning. Also, temporary visa holders, including subclass 482 visa holders, are not eligible for Medicare (unless they are from a country with a reciprocal health care agreement in place) and need to pay significantly higher school fees for their children to attend public schools in Australia.

**11. What have been your experiences of the first year of operation of the Core Skills Stream of the Skills In Demand Visa or your recent experiences of the 482 Visa more generally?**

- Restrictive. Restricts mobility of visa holders between occupations.
- Expensive. For example, it might cost \$20,000 to lodge a new visa application to move to a new role with the same employer sponsor.
- Lengthy in its processing times. It can take three to five months to process a 482 visa application which means the average time to mobilise key talent can be five or more months which is too long. The unpredictability and length of the process has resulted in lost candidates and delayed start dates as employers are unable to onboard skilled talent in a timely manner. This impacts on their ability to provide effective client services and puts extra workload on current employees.



- Improvements required include reduced processing times, priority for current visa holders changing sponsors, priority for accredited sponsors and clear communication on the status of visa applications.

**12. Is the [Core Skills Income Threshold \(CSIT\)](#) for the Core Skills Stream of the Skills In Demand visa appropriate? If not, why not?**

- We have received different views from our members on this question. Some are supportive of the CSIT for applications lodged from 1 July this year (\$76,515), as it helps ensure that visa holders can comfortably meet the cost of living in Australia. While some of our members support the intent of the increase, including to prevent exploitation of workers, a more gradual, annual adjustment would have allowed businesses to better plan and manage their budgets to meet these requirements. Additionally, the timing of this change was challenging, as it coincided with a reduction in the relevant work experience requirement to at least 12 months. These two policy shifts did not appear to be well aligned, creating further complexity for employers. While the reduced experience requirement is beneficial, many junior roles do not meet the CSIT threshold which limits their eligibility for the 482 visa.
- Other members have said the CSIT doesn't consider levels of seniority of roles, occupation differences with salaries or regional salary variations across Australia. It applies a one-size-fits-all approach that overlooks important distinctions. Also, the recent decrease in the number of years' experience required for a SID Visa does not align with the increase in the CSIT. There are not many occupations where a graduate with one year of experience will earn \$76,515.

**13. What is the likelihood of domestic supply meeting demand for external auditors?**

- Our members have advised it is highly unlikely. Despite ongoing recruitment efforts, they continue to face challenges in sourcing suitably qualified and experienced Australian candidates for certain roles including external auditors. Factors contributing to this include limited domestic graduate numbers, a lack of suitably experienced external auditors in the local market, competition across industries for the same skill sets, geographic constraints that make it difficult to attract talent to certain locations, attractiveness of the profession, and limited (nationally consistent) careers education for high school students.

**14. Is demand for external auditors likely to increase over the next five years? What factors will impact this?**

- There are very few local candidates with the required skillset in external audit. The domestic market does not provide sufficiently experienced auditor applicants to satisfy the current staff shortages experienced by many organisations in Australia.
- There are significant mandatory legislative and regulatory audit requirements imposed on companies, government organisations and other entities. These audits must be fulfilled by competent and professionally skilled auditors if trust and confidence in capital markets is to be upheld.

- The expansion of the audit function to cover both financial and non-financial information, and the increasing importance of audits for stakeholders, has resulted in increased demand for external auditors.
- The mandatory climate-related financial disclosure regime in Australia will further increase the need for external auditors and assurance professionals. It will require blended assurance teams with financial audit as well as climate and sustainability skillsets.
- Ultimately, the financial statement auditor will need to provide an assurance opinion on the climate and other required sustainability disclosures.
- As organisations adopt new technologies and face growing cybersecurity risks, there is increasing demand for auditors with expertise in IT systems, data integrity and digital compliance.

## 5. Recommendations

Based on the views provided in this submission and our online survey responses, CA ANZ's recommendations to JSA on the CSOL occupations relevant to our profession are set out below.

### 1. Retain the following occupations on the CSOL as advocated in our previous submission:

- Taxation Accountant (OSCA Code 2211135)
- Accountant (General) (OSCA Code 2211131)
- Management Accountant (OSCA Code 2211134)
- External Auditor (OSCA Code 211231)
- Internal Auditor (OSCA Code 211232)
- Finance Manager (OSCA Code 111231)
- Management Consultant (OSCA Code 223432)
- ICT Business Analyst (OSCA Code 273232)
- Cyber Security Advice and Assessment Specialist (OSCA Code 271132)
- Cyber Security Engineer (OSCA Code 271135)
- Cyber Security Analyst (OSCA Code 271133)
- Cyber Security Architect (OSCA Code 271134)
- Cyber Security Operations Coordinator (OSCA Code 271136).

### Add the following occupations to the CSOL:

- Forensic Accountant (OSCA Code 211133)
- Data Architect (OSCA Code 211133)
- Data Engineer (OSCA Code 223233)
- Information and Organisation Professionals nec# (OSCA Code 223999)

### 4. Do not add Financial Adviser (OSCA Code 212131) to the CSOL.

# Appendix B

## CA ANZ Survey Response - Forensic Accountant

1. Has your organisation received feedback (either directly or through surveys) from its members or persons it provides services to, on barriers to hiring Australian workers in the above occupation/s?

☐ Yes

☒ No

☐ I don't know

2. Are entry-level pathways available to Australian workers for any of the above occupation/s?

☒ Yes

☐ No

☐ I don't know

**If possible, please provide more information on these entry-level pathways available to Australian workers in the above occupation/s.**

Entry-level pathways are available for Australian workers to become Forensic Accountants.

As of July 2025, there are around 192 verified forensic consulting businesses in Australia. This number refers to businesses, not individual practitioners, and includes both sole practitioners and larger firms. CA ANZ has 195 CA Forensic Accounting Specialists (150 in Australia, 36 in New Zealand and 9 overseas).

The typical pathway involves:

1. Completing a bachelor's degree in accounting, commerce, management finance, or a related field
2. Gaining foundational experience in accounting or audit roles, often through graduate programs or entry-level positions (one to two years in graduate accounting or junior audit roles)
3. Developing investigative and analytical skills relevant to forensic work, sometimes through on the job experience in investigations, audit or compliance or undertaking electives or short courses in fraud, investigation, or forensic accounting
4. Progressing into forensic accounting roles either within accounting firms, government agencies (such as the Australian Federal Police), or specialist consultant.

CA ANZ also offers a [Forensic Accounting Specialisation](#), delivered in partnership with Macquarie Business School, which includes an Experienced Pathway course for members with at least four years of experience in the field. Until recently we also offered a Post-graduate study Emerging Pathway course.

CA ANZ develops Forensic Accounting specific continuing professional development (CPD), with the topics identified with guidance from our expert members. We also develop CPD in the form of conferences, digital learning, and live webinars. Our CA Capability+ tool helps members identify and build relevant skills for the future.

We also provide a broad range of CPD and professional development opportunities that accountants can access, even if they are not enrolled in the formal Forensic Accountant specialisation course. In addition, we provide face to face CPD networking and sharing knowledge events for forensic accountants and those interested in the field.

Some universities and training providers in Australia offer forensic accounting electives or postgraduate certificates to help graduates specialise earlier.

**3. To what extent do persons in the above occupation/s need to be residing in Australia?**

- ☐ Required to be in Australia
- ☐ Highly desirable to be in Australia
- ☐ Somewhat desirable to be in Australia
- ☒ No preference or requirement to be in Australia
- ☐ Desirable to be outside Australia
- ☐ I don't know

**If possible, can you explain why you answered**

There is no strict requirement for forensic accountants to reside in Australia to perform the job, especially for those working as consultants, in global firms, or on cross-border matters. The occupation is open to both residents and non-residents, provided they have the right skills, qualifications, and (if required) appropriate work rights or visas.

Australian employers and clients, however, often highly prefer or require local residency for practical reason such as knowledge of Australian law, regulations, and court procedures, as well as the ability to attend court, client meetings, or investigations in person.

Government and regulated roles (e.g. with the Australian Federal Police or in sensitive investigations) typically require Australian residency or citizenship, due to security clearance and legal requirements.

**4. Generally, how much work experience do you understand Australian employers seek when looking for workers to fill vacancies in the above occupation/s?**

- ☐ 4 or more years

- ☐ 3 years
- ☒ 2 years
- ☐ 1 year
- ☐ None
- ☐ I don't know

One to two years of experience is typically required for junior Forensic Accountant roles, with more senior or specialist positions requiring three to four or more years of experience.

**5. Based on feedback from your members or the work of your organisations, how important is it that work experience in the above occupation/s to be Australian work experience?**

- ☒ Not at all
- ☐ A little bit
- ☐ Important
- ☐ Very Important
- ☐ I don't know

The CA ANZ Specialisations regulations require at least four years of practical Forensic Accounting experience within the last ten years to be eligible for recognition as a CA Forensic Accounting Specialist. However, we do not mandate that this experience must be gained in Australia. Both full-time and part-time experience are accepted, and there is flexibility to recognise overseas experience if it is relevant and meets the competency requirements. See CA ANZ's website for further information on our CA Forensic Accounting Specialisation [Experienced Pathway](#).

**6. What do you understand is the most common qualification level held by workers in the above occupation/s?**

*Qualification level refers to the Australian Classifications Framework (AQF).*

- ☐ Doctoral Degree/PhD
- ☐ Masters Degree
- ☐ Graduate Diploma or Graduate Certificate or Honours Degree
- ☒ Bachelor Degree or Vocational Degree
- ☐ Undergraduate Certificate
- ☐ Associate Degree, Advanced Diploma or Diploma qualification
- ☐ Certificate IV or III qualification

☐ None of the above

☐ I don't know

7. **Based on feedback from your members or information collected by your organisation on visa intentions, are Employer Sponsored Skilled Visa holders recruited in any of the above occupation/s (either within or outside your organisation/members' organisations)?**

☐ Yes

☒ No

☐ I don't know

**Based on feedback from your members or information held by your organisation, what factors might lead to a business seeking to sponsor an applicant for a skilled visa in any of the above occupation/s?**

Lack of suitable applicants in the Australian market to meet current shortages and increasing demand for Forensic Accountants, particularly where senior or specialist positions are needed which require three to four years of experience. Some of our members have advised that it is often hard to fill vacancies for Forensic Accountants, and most vacancies are open for 100 or more days. Vacancies for more senior Forensic Accountant roles may be open for 12 months or longer. CA ANZ understands that Forensic Accountants typically stay in their roles for 3 to 7 years.

8. **Based on feedback from your members or information held by your organisation, do visa applicants or visa holders experience difficulties in having their qualifications recognised in any of the above occupation/s?**

☐ Yes

☒ No

☐ I don't know

**If applicable, please provide more information and evidence on the difficulties visa applicants or visa holders experience in having their qualification/s recognised in the above occupation/s.**

As far as CA ANZ is aware, the Forensic Accountant occupation is not currently listed on the CSOL or any other Skilled Occupation List which is eligible for an Employer Sponsored Skilled Visa in Australia. Therefore, we have not received any feedback from visa applicants in regard to difficulties in having their qualifications recognised as part of migration skills assessment.

Our Migration Skills Assessment team has not received any enquiries in relation to opportunities to work in Forensic Accounting roles in Australia. As this is an exciting area of career growth and demand in Australia, we believe there would be interest if the occupation was included on the CSOL and eligible for an Employer Sponsored Skilled Visa.

9. Based on feedback from your members or information held by your organisation, do skilled visa holders experience difficulties with attaining Australian registration or licensing in any of the above occupation/s?

- ☐ Yes
- ☐ No
- ☒ Not applicable
- ☐ I don't know

If applicable, please provide more information and evidence on the difficulties visa holders experience with attaining Australian registration or licensing in any of the above occupation/s.

For the same reasons outlined above we have not received any feedback from visa holders in regard to difficulties with attaining Australian registration or licensing in this occupation.

10. Based on feedback from your members or information held by your organisation, are the employability, communication or other soft skills of visa holders in any of the above occupation/s at a different level to those of Australian workers?

- ☐ Yes, above Australian workers
- ☐ Yes, below Australian workers
- ☐ No, about the same
- ☒ I don't know

11. Based on feedback from your members or information held by your organisation, are there other difficulties faced by skilled visa holders in any of the above occupation/s?

- ☐ Yes
- ☒ No

If possible, please provide more information and evidence of these other difficulties experienced by persons in any of the above occupation/s.

12. Do you have knowledge of the wages paid to skilled visa holders for any of the above occupation/s?

- ☒ Yes
- ☐ No

13. How much do employees in the skilled occupation/s above typically earn before tax or other approved deductions?

- ☐ Hourly \_\_\_\_\_
- ☐ Daily \_\_\_\_\_
- ☐ Weekly \_\_\_\_\_
- ☐ Fortnightly \_\_\_\_\_
- ☐ Monthly \_\_\_\_\_
- ☐ Yearly 100,000 \_\_\_\_\_

**If possible, please provide information on how the figure of was determined for the above occupation/s (e.g. surveys).**

The average annual salary for a Forensic Accountant in Australia ranges from \$90,000 to \$110,000 (seek.com.au September 2025). [Other sources](#) show that an entry level Forensic Accountant earns closer to \$105,000 in Australia and an average base salary is \$147,303.

**14. Are you aware of any recent changes to registration and/or membership requirements for any of the above occupation/s?**

☐ Yes

☒ No

**If possible, could you please elaborate on what these changes are to registration and/or membership requirements for any of the above occupation/s?**

We are not aware of any major recent changes to the core registration or membership requirements for forensic accountants in Australia. The typical pathway remains:

- Completion of a relevant bachelor's degree (e.g., accounting, commerce, management)
- Completion of the Chartered Accountants (CA) Program (or equivalent)
- Membership in a recognised professional body (CA ANZ, CPA Australia, or IPA).
- For those seeking formal recognition as a specialist, completion of the CA ANZ Forensic Accounting Specialisation and meeting practical experience requirements.

The APES 215 Forensic Accounting Services standard remains the key professional and ethical standard for forensic accountants in Australia. The most recent revision took effect for engagements commencing on or after 1 January 2020, and there have been no further updates since then. Members must continue to comply with APES 215 and the CA ANZ regulations (CR6 and CR6D) for specialisation.



15. Based on feedback from your members or information held by your organisation, do you expect demand for skilled workers in any of the above occupation/s to increase, decrease or remain stable within the next 5 years?

☒ Increase

☐ Remain stable

☐ Decrease

☐ I don't know

**If possible, please describe what factors lead you to expect the demand to *increase/decrease* for the above occupation/s?**

The demand for forensic accountants in Australia is steadily increasing. This growth is being driven by rising corporate fraud, money laundering, and other incidences of cybercrime and complex financial crimes, the impact of AI and technological developments, and increasingly stringent legal and regulatory requirements. CA ANZ introduced its CA Forensic Accounting Specialisation in response to this demand and to provide formal recognition of the skills, knowledge, and experience of forensic accountants, particularly in areas such as legal disputes, fraud investigations, and expert court evidence. It aims to elevate the professional standing of our members working in this increasingly vital field.

# Appendix C

## CA ANZ Survey Response – Financial Adviser

1. Has your organisation received feedback (either directly or through surveys) from its members or persons it provides services to, on barriers to hiring Australian workers in the above occupation/s?

☒ Yes

☐ No

☐ I don't know

**If possible, please provide more information and evidence on these barriers to hiring Australian workers in the above occupation/s.**

The total number of financial advisers in Australia has declined over the past six years, the annual number of new entrants remains low, and departure rates high, due to various factors including the burdensome regulatory framework and associated costs for advisers.

There were 178 new entrants on the Financial Advisers Register (FAR) in 2023, rising to around 200 in 2024. Around 700 to 1,000 advisers are estimated to leave the industry annually. The total number of financial advisers on the FAR declined from around 26,500 in 2019 to around 15,300 by July 2025.

**CA ANZ advocates for enabling all Australians to access strategic financial advice by allowing qualified accountants to provide it. We do not support adding Financial Adviser (OSCA code 212131) to the CSOL, as temporary skilled migration is not an appropriate path to address Australian workforce shortages in this occupation.**

Australians should be able to plan their retirement journey without hassle or complication. However, it can be difficult for people to understand how superannuation, taxation, age pension and aged care regulatory settings work together, and how to produce the best possible outcome over the long-term. This complexity has created a void where 11.8 million Australians are seeking advice, but there are not enough financial advisers to meet the demand.

Chartered Accountants are highly trained and skilled professionals who can solve this issue, but the regulatory environment needs urgent reform to allow CA ANZ members in public practice to support their clients with their everyday financial challenges. This can be achieved by amending the *Corporations Regulations 2001* to allow a qualified accountant, who is a member of a major accounting body, to provide strategic financial advice. CA ANZ estimates that this regulatory reform will increase the number of professional financial advisers in Australia.

We have long advocated for reforming entry pathways for professional advisers qualifications given their [widely acknowledged flaws](#) and have actively engaged with government on these important reforms since consultation began in Australia

More recently, CA ANZ made several submissions to Treasury, including on the government's proposal to [amend the education and training standards for relevant providers](#) and on the [ten years 'experienced](#)

[adviser pathway](#) where we recommended extending the timeframe. We also participated in a private submission on financial adviser education standards with the Joint Association Working Group.

CA ANZ actively engaged in consultations on the Quality of Advice Review, and the government's response to the recommendations of the Review, including reforms to the regulation of financial advice through the Delivering Better Financial Outcome (DBFO) package, making several [submissions to Treasury](#).

We continue to engage closely in the government's [reform of the education standards for professional financial advisers](#) which build on the DBFO package to help address the current shortage of financial advisers and meet the future demand for financial advice.

**2. Are entry-level pathways available to Australian workers for any of the above occupation/s?**

☒ Yes

☐ No

☐ I don't know

**If possible, please provide more information on these entry-level pathways available to Australian workers in the above occupation/s.**

The financial adviser standards and entry for new entrants and existing advisers in Australia are outlined [on the Treasury website](#).

In summary, the following requirements must be met to become a financial adviser in Australia:

- completion of an approved qualification, with the list of approved qualifications limited to those focused specifically on financial advice
- completion of a 1,600 hour professional year
- completion of the financial adviser exam, and
- continuing professional education.

**3. To what extent do persons in the above occupation/s need to be residing in Australia?**

☐ Required to be in Australia

☒ Highly desirable to be in Australia

☐ Somewhat desirable to be in Australia

☐ No preference or requirement to be in Australia

☐ Desirable to be outside Australia

☐ I don't know

**If possible, can you explain why you answered**

A key component of financial advice is retirement planning advice. This type of advice is best provided by a person who is residing in Australia and has strong, current knowledge of the Australian tax, superannuation, aged care and aged pensions systems and how they work together. Financial advisers need to stay up to date with the continuous changes in these areas.

**4. Generally, how much work experience do you understand Australian employers seek when looking for workers to fill vacancies in the above occupation/s?**

☒ 4 or more years

☐ 3 years

☐ 2 years

☐ 1 year

☐ None

☐ I don't know

**5. Based on feedback from your members or the work of your organisations, how important is it that work experience in the above occupation/s to be Australian work experience?**

☐ Not at all

☐ A little bit

☐ Important

☒ Very Important

☐ I don't know

**6. What do you understand is the most common qualification level held by workers in the above occupation/s?**

*Qualification level refers to the Australian Classifications Framework (AQF).*

☐ Doctoral Degree/PhD

☐ Masters Degree

☐ Graduate Diploma or Graduate Certificate or Honours Degree

☒ Bachelor Degree or Vocational Degree

☐ Undergraduate Certificate

☐ Associate Degree, Advanced Diploma or Diploma qualification

☐ Certificate IV or III qualification

☐ None of the above

☐ I don't know

7. **Based on feedback from your members or information collected by your organisation on visa intentions, are Employer Sponsored Skilled Visa holders recruited in any of the above occupation/s (either within or outside your organisation/members' organisations)?**

☐ Yes

☒ No

☐ I don't know

**Based on feedback from your members or information held by your organisation, what factors might lead to a business seeking to sponsor an applicant for a skilled visa in any of the above occupation/s?**

One possible reason is the shortage of financial advisers in Australia. However, CA ANZ does not consider this a suitable reason, in itself, to use the migration pathway for this occupation.

8. **Based on feedback from your members or information held by your organisation, do visa applicants or visa holders experience difficulties in having their qualifications recognised in any of the above occupation/s?**

☒ Yes

☐ No

☐ I don't know

Recognition of overseas financial advice qualifications can be a challenge. It requires meeting the criteria for assessment of a foreign qualification and this may need to be done on a case-by- case basis. Further details are [on the Treasury website](#).

**If applicable, please provide more information and evidence on the difficulties visa applicants or visa holders experience in having their qualification/s recognised in the above occupation/s.**

9. **Based on feedback from your members or information held by your organisation, do skilled visa holders experience difficulties with attaining Australian registration or licensing in any of the above occupation/s?**

☒ Yes

☐ No

☐ Not applicable

☐ I don't know

To become a financial adviser in Australia, an individual must:

- complete an approved qualification, with the list of approved qualifications limited to those focused specifically on financial advice
- complete a 1,600 hour professional year
- complete the financial adviser exam, and
- undertake continuing professional education.

This process takes around four to five years to complete from commencement of study to registration, making it unsuitable for a new entrant on a temporary visa.

Further, the migration skills assessment system does not recognise the professional year or licensing requirements for financial advisers in Australia.

**10. Based on feedback from your members or information held by your organisation, are the employability, communication or other soft skills of visa holders in any of the above occupation/s at a different level to those of Australian workers?**

- ☐ Yes, above Australian workers
- ☐ Yes, below Australian workers
- ☒ No, about the same
- ☐ I don't know

Context is important. It depends on the individual financial adviser, if they are onshore or offshore, and the type of client they will be servicing in Australia.

Onshore migrants may have stronger employability, communication and other soft skills than offshore migrants, equivalent to that of Australian workers, based on their local networks and knowledge of the Australian culture and context.

If the financial adviser is part of an internationally recognised member body, their communication, employability and other soft skills gained through CPD, and networking will be transferable in Australia.

Our member feedback indicates that employability and other soft skills of some migrant applicants for financial adviser roles may at times be at a different level to those of local workers. This could be due to the lack of local experience.

**11. Based on feedback from your members or information held by your organisation, are there other difficulties faced by skilled visa holders in any of the above occupation/s?**

- ☒ Yes
- ☐ No

Financial advice is based on trust. This can be difficult for people to develop if they are new to the country or will only be here for a short time on a temporary skilled visa.

Financial and retirement planning advice often requires taking a long term view and developing a trusted client and adviser relationship over the long term. Many employers will not consider a person on a temporary skilled visa a suitable candidate to provide such advice.

**12. Do you have knowledge of the wages paid to skilled visa holders for any of the above occupation/s?**

☒ Yes

☐ No

**13. How much do employees in the skilled occupation/s above typically earn before tax or other approved deductions?**

☐ Hourly \_\_\_\_\_

☐ Daily \_\_\_\_\_

☐ Weekly \_\_\_\_\_

☐ Fortnightly \_\_\_\_\_

☐ Monthly \_\_\_\_\_

☐ Yearly 110,000 \_\_\_\_\_

**If possible, please provide information on how the figure of was determined for the above occupation/s (e.g. surveys).**

The average annual salary for Financial Advisers in Australia ranges from \$110,000 to \$130,000 (seek.com.au September 2025). In CA ANZ's experience, Financial Adviser salaries can be negotiated with an employer. Starting salaries for new entrants are around \$80,000 to \$90,000 and can increase to the range of \$120,000 to \$140,000 based on a few years of local experience, with incentives and bonuses on top. Heads of Financial Advice businesses can earn higher salaries in the range of \$190,000 to \$230,000, with New South Wales and Victoria typically the highest earning markets.

**14. Are you aware of any recent changes to registration and/or membership requirements for any of the above occupation/s?**

☒ Yes

☐ No

The new financial adviser education and training standards and the code of ethics for licensed financial advisers in Australia are outlined on the [Treasury website](#). Recent changes are outlined in the former Treasurer and Minister for Financial Services [media release](#) on 10 February 2025.

**15. Based on feedback from your members or information held by your organisation, do you expect demand for skilled workers in any of the above occupation/s to increase, decrease or remain stable within the next 5 years?**

☒ Increase

☐ Remain stable

☐ Decrease

☐ I don't know

**If possible, please describe what factors lead you to expect the demand to increase/decrease for the above occupation/s.**

CA ANZ expects demand for financial advice to rise within the next five years in response to Australia's increasing retirement population and intergenerational wealth transfer.

The growing complexity of Australia's tax, superannuation, retirement income, aged care and aged pension systems is also increasing demand for advice from qualified, professional financial advisers.

Small businesses will increasingly seek advice to fill common capability gaps such as cashflow management, financial management and investment strategies.



# Appendix D

## About us

Chartered Accountants Australia and New Zealand (CA ANZ) represents more than 140,000 financial professionals, supporting them to build value and make a difference to the businesses, organisations and communities in which they work and live. Around the world, Chartered Accountants are known for their integrity, financial skills, adaptability and the rigour of their professional education and training.

CA ANZ promotes the Chartered Accountant (CA) designation and high ethical standards, delivers world-class services and life-long education to members and advocates for the public good. We protect the reputation of the designation by ensuring members continue to comply with a code of ethics, backed by a robust discipline process. We also monitor Chartered Accountants who offer services directly to the public.

CA ANZ is a professional accrediting body and a TEQSA registered provider of higher education.

Our flagship CA Program, the pathway to becoming a Chartered Accountant, combines rigorous education with practical experience. Ongoing professional development helps members shape business decisions and remain relevant in a changing world.

We actively engage with governments, regulators and standard-setters on behalf of members and the profession to advocate in the public interest. Our thought leadership promotes prosperity in Australia and New Zealand.

Our support of the profession extends to affiliations with international accounting organisations.

We are a member of the International Federation of Accountants and are connected globally through Chartered Accountants Worldwide and the Global Accounting Alliance. Chartered Accountants Worldwide brings together members of 16 chartered accounting institutes to create a community of more than 1.8 million Chartered Accountants and students in more than 190 countries. CA ANZ is a founding member of the Global Accounting Alliance which is made up of 10 leading accounting bodies that together promote quality services, share information and collaborate on important international issues.

We also have a strategic alliance with the Association of Chartered Certified Accountants. The alliance represents more than 870,000 current and next generation accounting professionals across 179 countries and is one of the largest accounting alliances in the world providing the full range of accounting qualification.