

## About Us

Vialto Partners is a global organisation that assists businesses and individuals with cross border mobility. Previously PricewaterhouseCoopers' (PWC) Global Mobility business, on 01 May 2022, Vialto Partners became a standalone global business specialising in:

- Immigration
- Mobility policy
- Global remote work
- Business travel
- Employer and employee tax services
- Payroll
- Employee equity and share schemes
- Mobility technology

Vialto Partners employs over 6000 immigration and mobility professionals globally and has a presence in most major locations. In Australia, Vialto Partners has nearly 200 employees across Adelaide, Brisbane, Melbourne, Perth, and Sydney. Vialto Partners provides immigration and tax services to a number of Australia's most high profile companies, multinational corporations with an Australian presence, as well as individuals with their personal immigration and tax requirements.

Vialto Partners advises on migration matters across a broad spectrum of visa subclasses, and employs a dedicated national team of Lawyers and Registered Migration Agents. Further information about Vialto Partners, both in Australia and globally, is available at: <https://vialtopartners.com/>

## Summary of Position

Vialto Partners welcomes the opportunity to make submissions in relation to Jobs and Skills Australia's consultation on the current Core Skills Occupation List ("CSOL"). Throughout these submissions, Vialto Partners seeks to present recommendations on occupation(s)<sup>1</sup> which we, on behalf of our clients, seek to be included in the CSOL. Where appropriate and relevant, a case study will be presented to showcase our clients' first-hand knowledge and experience with the current migration settings.

In the absence of defined Terms of Reference, our submission seeks to focus and elaborate further on the key employment industries in which our major clients operate. These industries are: (1) Mining and Construction; (2) Telecommunications and Technology; (3) Professional Services; and (4) Information and Communications Technology.

## Mining and Construction

Under this industry, Vialto Partners proposes the inclusion of the following occupations to the CSOL:

1. **Production Manager (Mining) - 132233;**
2. **Articulated Truck Driver - 713231;**

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<sup>1</sup> For consistency and alignment with the Submission Guidelines, the various occupations which are referred to throughout this submission are derived from [Occupation Standard Classification for Australia \(OSCA\)](#) (as opposed to ANZSCO - 2022).

3. **Industrial Spray Painter - 731131;**
4. **Crane, Hoist, or Lift Operator - 732131;**
5. **Construction Rigger - 821231;** and
6. **Scaffolder - 821731.**

### *Why should these occupations be included in the CSOL?*

Currently, the CSOL does not incorporate nor adequately capture occupations which truly reflect the needs and demands of employers who operate in this industry. As a result, employers are:

- often left with no choice but to select / nominate alternative occupations on the current CSOL which only *partially* (not fully) align with the offered role(s) in their organisations they seek to fill in order to move ahead with sponsorship; and
- negatively impacted by being unable to fill positions that are of a high skill shortage, critical in nature to the client project(s) and contractual agreements, due to the standard program being unable to support critical positions within the industry. This is exacerbated by the long processing times and bureaucracy required to be approved for a Labour Agreement, specifically a Company Specific Labour Agreement (“CSLA”) where the Designated Area Migration Agreement (“DAMA”) is unable to be utilised.

#### **Case Study 1:**

An ASX-listed company requiring the role of “Mining Manager” to be filled has defaulted to the usage of the occupation of Mining Engineer (excluding Petroleum) - 233611. A better fit for this role would be the occupation of Production Manager (Mining) - 132233, however, this occupation is **not** on the CSOL. Additionally, when hiring a “Crane Operator”, this company has had to use the occupation of Mechanical Engineering Technician - 313934, as the better suited occupation of Crane, Hoist, or Lift Operator - 732131 is also **not** on the CSOL.

### *Why should occupations outside of Skill Levels 1 to 3 be included on the CSOL?*

At present, occupations outside of Skill Levels 1 to 3 do not form part of the CSOL. Vialto Partners submits that this arrangement should be reevaluated considering the increasing difficulty of attracting skilled talent to fill roles falling under these occupations. From 2022 to 2024, the mining and construction industries experienced the most severe skill shortages nationally, raking first and second across all sectors.<sup>2</sup>

To help alleviate pressures in recruiting talent, Vialto Partners recommends the inclusion of a select number of other Skill Level occupations (with emphasis on the above-noted occupations) to the CSOL. Alternatively, Vialto Partners supports consideration of these occupations under the proposed “Essential Skills Pathway”, which was outlined in the Australian Government’s Migration Strategy, but unfortunately, has yet to be developed or implemented. In the meantime, however, we strongly urge the immediate inclusion of these occupations to the CSOL.

Whilst Vialto Partners understands that employers have the option to utilise either the DAMA (depending on the region) or a CSLA to facilitate the nomination of roles at these skill levels, it is important not to overlook the

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<sup>2</sup> Mining and Automotive Skills Alliance, *Mining Research Bulletin - September 2025* (Web Page)  
<<https://ausmasa.org.au/news-and-events/mining-research-bulletin-september-2025/>>.

significant challenges associated with these pathways. Both DAMAs and CSLAs are highly burdensome for employers, as they are administratively complex, document-intensive, and are often subject to unreasonably long processing and approval times. In addition, the pathways under the Labour Agreement often impose a skill assessment required for the visa applicant, where the standard pathway does not. This significantly increases the complexity of sponsoring foreign workers to fill these critical position(s).

### Case Study 2:

A major Australian construction company seeking to sponsor the above-mentioned occupations has had a CSLA application pending since May 2023. This significant delay has, unsurprisingly, prevented the business from filling critical positions, such as Crane, Hoist or Lift Operator - 712111<sup>3</sup>, Construction Rigger - 821231<sup>4</sup>, and Industrial Spray Painter - 731131<sup>5</sup> (all Skill Level 4 occupations). Moreover, such protracted processing times underscore how disruptive and unsustainable this pathway is for employers in an industry already facing acute skills shortages.

The above case studies demonstrate that the CSOL, in its current form, is not reflective of current labour market needs. Vialto Partners therefore calls for the inclusion of the occupations identified above to the CSOL to enable our clients in the mining and construction industry - who are significant users of the migration program - to recruit and retain the skilled workers they require in their organisations.

## Telecommunications and Technology

For this industry, Vialto Partners submits the following occupations be added to the CSOL:

1. **Customer Service Manager - 172132;** and
2. **Telecommunications Engineer - 272331.**

The absence of these occupations on the CSOL has greatly impacted our client, who is one of Australia's largest telecommunications companies. Consequently, our client has had to:

- Utilise an occupation which does not, strictly speaking, align with the offered role(s); and
- Delay the sponsorship of permanent residency under the Employer Nomination Scheme ("ENS") subclass 186 Direct Entry ("DE") stream for certain employees as they are left with no choice but to obtain a fresh positive skills assessment under a new occupation.

We elaborate further on this in the case studies presented below.

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<sup>3</sup> Jobs and Skills Australia, *Occupation Shortage List* (Web Page)

<<https://www.jobsandskills.gov.au/data/occupation-shortages-analysis/occupation-shortage-list>>. This occupation has been in shortage across all States and Territories in Australia since 2022 to present.

<sup>4</sup> Ibid. This occupation is in shortage in NSW, Victoria, and the Northern Territory.

<sup>5</sup> Ibid. This occupation has been in shortage across all States and Territories in Australia since 2023.

### Case Study 3:

An ASX-listed telecommunications company with retail stores across Australia has an ongoing need to recruit Store Managers. Whilst the role they are seeking to fill carries the title of “Manager”, the responsibilities of the role and skill requirements are slightly lower than that required of a Retail Manager (General) - 162131, which is the only potentially relevant occupation currently on the CSOL. A more accurate fit, with consideration of the roles, responsibilities, and skillset required, would have been Customer Service Manager - 172132, but because of its absence from the current CSOL is **not** possible.

Whilst we acknowledge that this issue could be addressed by recommending that the client pursue a CSLA, the significant administrative burden (as outlined earlier) makes this pathway commercially impractical. For a business whose primary focus is to maintain uninterrupted operations across its stores nationwide, the lengthy processing and approval times serve as a major deterrent.

Further, the absence of the occupation of Telecommunications Engineer - 272331 from the CSOL has also affected employees seeking to obtain permanent residency.

### Case Study 4:

Prior to the introduction of the CSOL, several employees whose roles aligned to the occupation of Telecommunications Engineer - 272331 obtained positive skills assessments from the relevant authority in preparation for sponsorship under the Direct Entry (“DE”) pathway. However, with the CSOL taking effect in December 2024 and the subsequent removal of the occupation from the list, these employees have been forced to realign their roles to an alternative occupation listed on the CSOL and obtain new positive skills assessment in order to access the DE pathway. This is punitive, as it imposes unnecessary costs and delays on employees. From an employer perspective, it further delays their ability to secure these workers as permanent employees.

## Professional Services

At present, the current CSOL only captures a business development role in the Information and Communications Technology (ICT) space i.e. ICT Business Development Manager - 221431. Vialto Partners submits that it is crucial that a non-ICT business development role be incorporated into the CSOL, specifically the occupation of **Business Development Manager - 112132**. This is to ensure that roles with a heavy focus on business development and process improvement within banks, technology, and professional services companies are being accurately aligned to the most appropriate occupation. Due to the absence of a non-ICT business development role, our clients have been using the occupation of Management Consultant - 227113.

Whilst the occupation of Management Consultant sufficiently aligns with the roles on offer, it still presents a hurdle to employees who are seeking to apply for the ENS subclass 186 DE pathway. It is well-known that the skills assessing authority for the occupation of Management Consultant, VETASSESS, take a strict approach in who they view as Management Consultants i.e. independent consultants who are employed by a management consulting firm. Consequently, employees who are employed by non-management consulting firms face an uphill battle in securing a positive skills assessment, leaving them with no choice but to wait the required two (2) years to access the Temporary Residence Transition (TRT) stream to access employer sponsored permanent residency.

## Information and Communications Technology

Australia's Information and Communications Technology (ICT) sector is rapidly expanding and evolving, with newer technology roles that employers require not appearing on skilled occupation lists.<sup>6</sup> At present, for our clients operating in the ICT industry, some of the most common occupations in use are Software Engineer and ICT Business Analyst, as both occupations are broad enough to encompass a wide range of roles in the ever-evolving ICT space.

To ensure that the occupation lists keep pace with the dynamic ICT industry and remain reflective of current market demand and employer needs, Vialto Partners recommends the inclusion of additional ICT occupations on the skilled occupations lists, including the CSOL. With a major shift in artificial intelligence (AI) for clients, this is driving the need for specialist ICT occupations, like Cloud Engineers. Of the occupations on the CSOL 2025 target consultation group list, we recommend the following occupations be included:

- Data Architect - 223232;
- Data Engineer - 223233;
- Enterprise Architect - 223431;
- Cloud Architect - 273231.
- Solution Architect - 273233; and
- Cloud Engineer - 273331.

## Conclusion

We trust this submission offers valuable insight into our clients' experiences and that our recommendations will assist in shaping the future of the CSOL. Should you have any questions or would like to discuss any of the points raised in these submissions, please do not hesitate to contact us.

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<sup>6</sup> Accenture Strategy, ICT Industry Landscape Report - Prepared by Accenture for the NSW Skills Board (2023)  
<<https://www.nsw.gov.au/sites/default/files/2023-02/ICT-Industry-Landscape-Report.pdf>>