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ASSOCIATION OF MARKET AND SOCIAL RESEARCH ORGANISATIONS

Skilled Migration Occupation Lists
Stakeholder Engagement Team
Department of Jobs and Small Business

Sent by email: SkilledMigrationList@employment.gov.au
cc: employerpolicy@homeaffairs.gov.au
michael.willard@homeaffairs.gov.au

20 June 2018

Dear Sir/Madam,

RE: SKILLED MIGRATION OCCUPATION LISTS CONSULTATION
Market Research Analyst ANZSCO Code 225112
Marketing Specialist ANZSCO Code 225113

Thank you for providing the Association of Market and Social Research Organisations (AMSRO) the opportunity to provide comment on the Department of Jobs and Small Business ("the Department") Traffic Light Bulletin published in June 2018.

AMSRO is the national peak industry body representing over 90 market and social research companies throughout Australia. The research, data and insights industry turned over one billion dollars in 2016¹. AMSRO represents approximately 70% of industry turnover with member organisations employing over 5,000 people of which, over 1,300 are full-time professionals.

Market and social research is an important service that benefits all Australians. From political polls and television ratings, to surveys of customer satisfaction and the development of products and services, as well as studies on public health or the income and labour dynamics in Australia, market and social research provides valuable information about the society in which we live. This information helps government, commercial and not-for-profit organisations make informed decisions based upon the interests and needs of their constituents, clients and the general public.

Since the announcement of the visa reform in April 2017, AMSRO member organisation employers have raised a number of serious concerns about the removal of the **Market Research Analyst** position and agree that its ongoing exclusion will have a significant and adverse impact on short and long-term growth, productivity and revenue for the market and social research industry.

In light of this, in December 2017, AMSRO provided a consultation paper² to the Department in support of listing the occupation of Market Research Analyst to the Medium and Long-term Strategic Skills List

¹ AMSRO-ESOMAR 2016 report - <https://www.esomar.org/knowledge-center/reports-publications>

² AMSRO DoE submission (dated 1 December 2017 appended)

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MLTSSL. While we welcome the addition of the occupation to the Regional Occupation List in January 2018, regrettably, it has not been listed on either the MLTSSL – which is where it is most needed.

The skill shortage and inadequate numbers to fill experienced and senior position vacancies in the occupation of Market Research Analyst remains a critical issue for the market research industry across capital cities where the majority of market and social research companies operate including those in NSW and Victoria in particular.

AMSRO would also like to take this opportunity to address the skill shortage in experienced and senior roles in the closely related occupation of **Marketing Specialist** and recommend that this occupation, currently on the Short-term Skilled Occupation List (STSOL) also be listed on the MLTSSL. Given the inadequacies of ANZSCO descriptors in general and for Market Research Analyst in particular, see below, as well as the increasing need for agility and multi-tasking in the sector, AMSRO member businesses have found that Marketing Specialist may be a more suitable occupation for some positions.

The growth in the demand for Market Research Analysts and Marketing Specialists, together with the rate of change in the nature of that demand, means that it is imperative that Australia grows its marketing capacity and capability. This is evidenced by the former Department of Employment's own projection that by 2022 employment of marketing professionals will have increased by 10.5% representing an additional 6,700 jobs in the next five years³.

To support our member company needs and inform this submission, AMSRO conducted a member Roundtable in May 2018 (in association with EY). The Roundtable was attended by AMSRO's leading member organisations, closely followed by a second poll conducted during May 2018 with a majority of the large employers in the industry. Data from this poll is provided in the attached Skill Shortage Table and referred to in this submission.

Member company data and commentary from CEOs and other senior executive representatives of member business included in this submission is therefore based on current industry intelligence including from the following companies which have agreed to be identified – Fiftyfive5, EY Sweeney, The Social Research Centre and WPP companies, including the Kantar Group.

All members emphasised their growing concerns around the following key areas:

- **Skill shortage**

The skill shortage remain critical and in fact, has escalated. Data from member feedback shows that over the past 12 months there has been an increasing number of job vacancies for experienced senior talent with many roles remaining unfilled for up to 12 months and employers unable to find suitable, experienced local candidates to fill the role.

³ Department of Jobs and Small Business, *2017 Employment Projections*. Available from: <<http://lmip.gov.au/default.aspx?LMIP/EmploymentProjections>>. [30 May 2018]

In addition, the sector in Australia is maturing and has relied on skilled and experienced professionals from overseas to help the sector grow in Australia. Members polled in May 2018 consistently reported that the local labour market cannot provide the highly experienced niche skills required for senior roles. *See Skill Shortage table and commentary below and attached.*

AMSRO member employers have not and do not wish to rely on overseas workers as they continue to employ locals first and invest significantly in skilling the Australian labour market. An updated summary analysis of workforce of member employer who responded to polls follows:

Summary analysis of workforce of respondent employers				
	Number of Australian permanent resident and citizen employees	Number of temporary visa holders	Number of Australian interns employed in the past two years	Number of Australian graduates (less than two years post qualification work experience) employed in the past two years
TOTAL	1,257	122 (<10%)	14 (1.1%)	56 (4.45%)

Further, members invest in collaborations with Australian universities to promote the industry to students and graduates as well as to develop suitable courses and examinations.

- **Negative consequences for business**

Market and Social Research is a specialist or ‘niche’ sector and without the ability to hire skilled experienced and senior international workers, the impact on businesses continues to be significant.

AMSRO member CEO’s (consulted in our May 2018 poll) reported the following observations based on the past 12 months:

- A precarious business model with an inability to service clients and accept new projects resulting in a down turn in productivity and profitability
- Engaging staff at the wrong level, both above and below their current capability
- Lengthy delays in filling positions at the mid-senior level, particularly where specialist technical skills are required
- Inability to grow the business and hire more local talent
- Staff shortages and increased workload (and stress) for current staff
- Risk to the jobs of current staff (due to the shortage of experienced staff)
- Decreased learning opportunities for local staff as limited access to international knowledge and expertise
- Less competitiveness in the global market.

AMSRO recommends that:

1. The following ANZSCO occupations are moved to the MLTSSL to alleviate the shortage of skilled senior and experienced professionals:
 - **Market Research Analyst ANZSCO Code 225112**
 - **Marketing Specialist ANZSCO Code 225113**
2. That the escalating productivity and profitability issues impacting business be recognised, and changes implemented to alleviate the loss to companies and overall growth of the industry.
3. Caveats are imposed to reflect the niche and highly specialised skills in shortage in the industry.
4. Classification issues relating to an outdated ANZSCO system are changed to accurately reflect the role of the Market Research Analyst.
5. The frequency of updating the lists is revised to allow employers adequate planning time to meet the needs of their business operations and clients.

Listing Market Research Analyst and Marketing Specialist on the MLTSSL, and not the STSOL, is vital for the growth of our industry and the services we provide to Australian business and government. Unless an occupation is on MLTSSL with a potential pathway to permanent residence it is very difficult for employers to attract and retain the best international talent to Australia.

We would welcome the opportunity to engage further with the Department on this issue when appropriate.

Yours sincerely,



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1. SKILL SHORTAGE - INADEQUATE NUMBERS TO FILL SENIOR POSITION VACANCIES

Employers will not seek to sponsor temporary visa holders who do not have the skills they require. The exercise is an expensive undertaking by employers and if there is local talent available, a business cost they would rather avoid.

The skill shortage issue is driven by supply and demand and while our industry invests heavily in professional development (*as evidenced in our earlier submission*), particularly graduate programs, there remains a critical skilled labour shortage across experienced to senior levels which represents a local workforce gap that needs to be supplemented by international talent. (*This is evidenced by sample data presented in our appended Skill Shortage table.*)

The niche demand for experienced and senior Market Research Analyst and Marketing Specialists needs to be understood in the context of the continuing and projected growth in the sector generally, as demonstrated by:

- IBISWorld Industry Report
- Department of Jobs and Small Business Vacancy Report
- Australian Jobs – Occupation Matrix Report – Department of Jobs and Small Business

Data from the IBISWorld Industry Report⁴ indicates that the future demand for market and social research services will continue to grow, with services heavily relied upon by federal, state and local government, advertising firms, media companies and other organisations that require consumer insights and statistical research. With a projected 3.7% growth in employment in Market Research and Statistical Services in Australia from 13,581 positioning to 14,089 positions in 2022-23, the skill shortage issue can only get worse.

Table 1: IBISWorld Statistical data for Market Research and Statistical Services positions in Australia

Key Statistics

Industry Data

	Revenue (\$m)	IVA (\$m)	Establishments (Units)	Enterprises (Units)	Employment (People)	Exports (\$m)	Imports (\$m)	Wages (\$m)	Domestic Demand (\$m)
2008-09	2,350.8	1,158.5	3,427	3,232	13,903	-	-	651.8	-
2009-10	2,500.1	1,212.0	3,450	3,252	14,208	-	-	699.4	-
2010-11	2,544.1	1,201.0	3,307	3,139	14,055	-	-	717.2	-
2011-12	2,824.7	1,287.9	3,132	2,933	14,348	-	-	763.0	-
2012-13	2,711.2	1,258.6	2,967	2,737	14,045	-	-	775.1	-
2013-14	2,661.9	1,258.1	2,929	2,732	13,612	-	-	785.3	-
2014-15	2,755.6	1,323.6	2,875	2,679	13,838	-	-	840.8	-
2015-16	2,934.9	1,387.6	2,815	2,616	13,571	-	-	881.0	-
2016-17	3,115.6	1,454.8	2,852	2,647	13,793	-	-	919.2	-
2017-18	3,004.6	1,442.5	2,811	2,613	13,581	-	-	928.4	-
2018-19	2,984.7	1,447.9	2,795	2,601	13,553	-	-	937.2	-
2019-20	3,027.5	1,473.4	2,809	2,612	13,671	-	-	957.8	-
2020-21	3,202.8	1,541.5	2,842	2,645	14,018	-	-	997.0	-
2021-22	3,334.3	1,592.6	2,856	2,662	14,243	-	-	1,027.4	-
2022-23	3,242.1	1,584.0	2,843	2,647	14,089	-	-	1,036.1	-

⁴ Allday, A 2018, *IBISWorld Industry Report M6950: Market Research and Statistical Services in Australia April 2018*. Available from: IBISWorld. [30 May 2018].

Source: IBISWorld – M6950 – Market Research and Statistical Services in Australia, April 2018. Available from: IBISWorld

The Department of Employment Internet Vacancies Index⁵, see table 2 shows a steady increase in vacancies for Advertising and Marketing Professionals in the past 12 months.

Table 2: Vacancy Report April 2018

ANZSCO_CODE	ANZSCO_TITLE	state	Feb-16	Mar-16	Apr-16	May-16	Jun-16	Jul-16	Aug-16	Sep-16	Oct-16	Nov-16	Dec-16	Jan-17	Feb-17	Mar-17	Apr-17	May-17	Jun-17	Jul-17	Aug-17	Sep-17	Oct-17	Nov-17	Dec-17	Jan-18	Feb-18	Mar-18	Apr-18
2246	Librarians	NSW	21	25	20	20	15	14	16	19	21	24	23	24	19	25	26	29	25	26	25	32	31	29	21	24	25	29	25
2247	Management and Organisation Analysts	NSW	346	402	427	448	455	448	456	462	425	401	344	362	350	413	394	451	433	459	443	453	493	496	437	423	429	514	530
2249	Other Information and Organisation Professionals	NSW	55	60	54	59	59	62	65	68	70	71	59	60	54	70	61	65	64	73	74	68	66	58	53	57	64	76	70
2251	Advertising and Marketing Professionals	NSW	905	1011	1005	1029	1064	1072	1080	1051	1008	952	799	794	815	924	897	922	923	980	1017	1072	1073	1027	860	904	922	1080	1057
2252	ICT Sales Professionals	NSW	18	19	17	18	16	16	15	15	15	14	11	10	9	14	14	16	12	13	13	14	14	12	10	11	12	13	13

Source: Vacancy Report April 2018, Department of Jobs and Small Business. Available from: <http://lmip.gov.au/default.aspx?LMIP/GainInsights/VacancyReport>

Comparable MLTSSL occupation - Management Consultant 224711

The occupation of Management Consultant 224711 which has been moved to the MLTSSL is a comparable occupation to Marketing Specialist and Market Research Analyst as they are in the “professional” category and have comparable skill level requirements.

A comparison of the general labour market data for Management Consultant to Market Research Analyst and Marketing Specialist supports the inclusion of the latter two occupations in the MLTSSL as well:

1. According to the Vacancy Report April 2018, see table 2, there are consistently greater numbers of internet vacancies for Advertising and Marketing Professional positions compared to vacancies for Management and Organisation Analysts positions.
2. According to the Occupation Matrix published by the Department of Jobs and Small Business⁶, see Table 3, Advertising and Marketing Professionals positions have “below average” rate of unemployment, in comparison to the “average” rate of unemployment for Management and Organisation Analysts.
3. There is a higher rate of women (60%) and those working part time (21%) in Advertising and Marketing Professionals positions in Australia, compared to Management and Organisation Analysts with 43% women and 18% part time⁷. This further exacerbates the skill shortage as explained in AMSRO’s previous submission. The high rate of women in the industry means a higher rate of loss of senior female talent with 10 years plus experience due to starting families.

⁵ Department of Jobs and Small Business 2018, *Vacancy Report April 2018*. Available from: <http://lmip.gov.au/default.aspx?LMIP/GainInsights/VacancyReport>. [30 May 2018]

⁶ Department of Jobs and Small Business 2018, *Australian Jobs – Occupation Matrix*. TRIM Reference D18/282124. Available from: <https://docs.jobs.gov.au/documents/australian-jobs-occupation-matrix>. [30 May 2018]

⁷ Department of Jobs and Small Business 2018, *Australian Jobs – Occupation Matrix*. TRIM Reference D18/282124. Available from: <https://docs.jobs.gov.au/documents/australian-jobs-occupation-matrix>. [30 May 2018]

Table 3: Australian Jobs – Occupation Matrix

ANZSCO Major group	ANZSCO Code (4-digit)	Occupation	Employ't Nov 2017 '000	5 year change to Nov 2017 '000	%	Working Part-time %	Female %	Median Age years	Unemploy't Rate 2017	Median Earnings	No Post-school Qual %	Projected Employ't Change %
Administration and Human Resources												
2	2242	Archivists, Curators and Records Managers (P)	7.2	0.7	10.4	29	69	46	Below Average	\$\$\$\$	14	18.3
1	1492	Call or Contact Centre and Customer Service Managers (M)	40.1	7.3	22.4	8	36	41	Below Average	\$\$\$	26	17.3
5	5411	Call or Contact Centre Workers (CA)	32.0	2.0	6.6	37	67	34	Above Average	\$\$	46	4.9
5	5111	Contract, Program and Project Administrators (CA)	121.1	11.5	10.5	21	58	42	Below Average	\$\$\$\$	18	7.4
1	1321	Corporate Services Managers (M)	16.9	-	-	19	62	48	Average	\$\$\$\$	23	6.4
5	5613	Filing and Registry Clerks (CA)	16.7	-3.8	-18.3	44	74	42	Above Average	\$\$	42	4.7
5	5311	General Clerks (CA)	235.6	25.4	12.1	42	85	44	Average	\$\$	43	8.8
1	1323	Human Resource Managers (M)	51.7	3.3	6.7	13	58	44	Average	\$\$\$\$	14	12.9
2	2331	Human Resource Professionals (P)	65.1	7.7	13.4	20	66	37	Average	\$\$\$	20	5.1
5	5412	Information Officers (CA)	65.6	-1.7	-2.5	32	67	39	Average	\$\$	38	10.0
5	5321	Keyboard Operators (CA)	65.1	8.9	15.8	42	85	42	Above Average	\$\$	47	-4.6
5	5614	Mail Sorters (CA)	7.9	-3.8	-32.7	38	57	50	Above Average	\$\$	58	-13.5
2	2247	Management and Organization Analysts (P)	63.7	6.9	12.2	18	43	42	Average	\$\$\$\$	12	15.4
5	5121	Office Managers (CA)	117.6	-6.8	-5.4	34	83	46	Below Average	\$\$\$	39	4.0
5	5211	Personal Assistants (CA)	49.9	-4.9	-8.9	25	99	42	Average	\$\$\$	36	-4.7
5	5421	Receptionists (CA)	180.7	-1.9	-1.0	54	94	41	Above Average	\$	48	-0.5
5	5212	Secretaries (CA)	49.6	-21.1	-29.9	49	95	50	Average	\$\$	48	-24.9
5	5615	Survey Interviewers (CA)	3.3	-2.3	-41.1	84	63	43	Above Average	-	33	-7.4
5	5616	Switchboard Operators (CA)	4.0	-0.6	-13.5	46	81	45	Above Average	-	58	-26.4
Advertising, Public Relations, Media and Arts												
2	2111	Actors, Dancers and Other Entertainers (P)	8.7	3.8	77.0	74	51	33	Above Average	\$\$\$\$	37	4.5
2	2251	Advertising and Marketing Professionals (P)	87.4	32.1	58.1	21	60	34	Below Average	\$\$\$	15	10.5
1	1311	Advertising, Public Relations and Sales Managers (M)	128.5	7.5	6.2	11	39	41	Below Average	\$\$\$\$	23	10.4

Source: Department of Jobs and Small Business 2018. *Australian Jobs – Occupation Matrix*. TRIM Reference D18/282124. Available from: < <https://docs.jobs.gov.au/documents/australian-jobs-occupation-matrix> >

2. NICHE ROLES REQUIRING HIGHLY SPECIALISED SKILLS – THE IMPACT ON BUSINESS

Market and social research is a professional and specialised services industry that relies heavily on its talent. As evidenced in the comments below (recorded in the May 2018 member poll), without the ability to hire highly specialised, international workers, the impact on businesses continues to be significant, with reports of revenue loss, a downturn in productivity, less opportunity for shared knowledge and limited capacity to compete on the global market.

“All other things being equal, we naturally have a preference to hire talent locally. Apart from anything else it is commercially advantageous to do so - the interviewing process is easier, there are no international relocation, logistical or cost issues to deal with, and none of the issues of cultural “fit” potentially encountered with overseas hires. For the same reason we can and do hire bright young graduates locally. The only reason we need to find talent from overseas is because all other things are not equal. In our niche industry, the volume of home grown talent is simply not always sufficient to fill all the available roles we have – this is especially the case at the mid-senior level, where you want to hire people with 5 to 7 years of really solid, often technical expertise in specific research areas – like pricing research, communications testing research or certain niche areas of social research – gambling prevalence or ‘quit smoking’ research for instance. They are niche areas and while you can find decent candidates to fill those roles in large employment markets like the UK, in Australia there are often only a handful of such individuals with the right skills set. It can be like finding a needle in a haystack and so you have to wait months and months for the right candidate to turn up. Sometimes out of desperation this results in hires being made or promotions being given where the candidate is not quite up to scratch, or not quite ready, with negative long-term consequences for everyone. The only other option is not to fill these positions at all, which constrains the growth of the business, and limits our ability to hire generally, including locally. That’s the impact that the removal of the Research

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Analyst position from the eligible list has had – in short, it's holding our whole business back!
Managing Director.

“When we cannot fill positions with suitable candidates, it has an overall effect on the business. Often, we have had to hire at a lower level (due to being unable to fill at the required level) simply because we need the resources. But those resources are at the wrong level, don't have the depth of skill, require extra training and support. Therefore, for more technical tasks we continue to rely on our existing mid-senior level staff to deliver and that puts extra pressure and strain on them. This is not a good strategy at all but we are stuck without the option of 457s. We have had to decide as a business not to submit tenders for certain projects because of a lack of resources and we wouldn't be able to deliver on our high-quality standards. This means that we are not able to have sustainable financial growth as a business. The more specialised research space in Australia continues to grow yet the amount of people in Australia who have the required skills to do this work is still limited. Therefore, engaging appropriate qualified candidates from overseas is a must for the viability of the business moving forward.” Chief Operations Officer.

“We require experienced candidates to fill market research analyst positions in this highly specialised area. The pharmaceutical market research sub-sector in Australia is very small, and the local labour market does not have the critical mass from which to hire sufficient experienced candidates. As such, our business is dependent on supplementing our local recruitment efforts with the recruitment of experienced candidates from large overseas pharmaceutical market research markets such as London and Singapore.” Managing Director.

“We believe that the Universities have really only started in the past few years partnering more with Market Research companies to promote roles in the market research industry. We find that the reputation amongst students still exists where they believe the only jobs available in the market research industry involve sitting in a phone room. This outdated view has previously not encouraged graduates to seek work in the industry and move towards a more “marketing department” position from their degrees. The more involvement that our company has had with the top universities in Australia, going to guest lectures, recently working with University of Sydney on a new Capstone subject in marketing, being part of case study competitions with University marketing societies and advertising online in the Universities Career Hubs, has increased our exposure rapidly and helped to source strong graduates for the companies. The problem we have is that the roles where we find there is a skills gap and where it's harder to recruit for is for the mid to senior level roles, where potentially the more traditional view of market research as an industry had been seen by graduates around that time and not many entered the industry in the past.” Human Resources Director.

“We are not able to train them fast enough so that they will reach the level where we are experiencing a skills gap in the market. We also are experiencing a huge shift in the market research industry regarding data and analytics and competing with consulting companies so we need top talent to be

able to compete with competitors to win work. We have strong junior level employees who are trained in a formal graduate program and are moving through the company but there is still a gap between the experience and skill level that we require talented staff. As the industry is experiencing a downturn in recent years it is harder and harder to bring on a large number of graduates each year.” Human Resources Director.

“Commercial research careers are not as common in Australia, particularly in the space of social research. A lot of people have academic research skills however they don’t always equate to what is required in the commercial space. Qualitative research is on the rise, however is still a ‘new skill’ in Australia. In the past we have always sourced qualitative researchers from the UK due to their intensive qualitative programs. They have far more technical expertise than Australian counterparts”. Managing Director.

“Put simply, there is not enough local talent. We also find that overseas talent has higher levels of education (often post graduate at a minimum) than within Australia. The technical knowledge and commercial experience in the industry surpasses local knowledge. That may be because the industry is relatively small.” Chief Executive Officer.

3. CAVEATS - ADDRESSING THE GOVERNMENT’S CONCERNS

Existing caveats

Marketing Specialist - STSOL

- a) annual earnings at least AUD65,000
- b) annual turnover at least AUD1M
- c) position is not based in a front-line retail setting or predominantly involves direct client transactional interaction on a regular basis

Market Research Analyst - ROL

- a) annual earnings of at least AUD65,000

Proposed caveats

In support of AMSRO’s submission that the industry is suffering from a shortage of specialised skilled and experienced senior talent, member executives polled for this submission agreed (in principle) to the following caveats:

- a) A minimum annual earnings of AUD80,000
- b) At least **three years relevant** work experience
- c) The business has annual turnover of at least AUD1 million
- d) The business has at least five employees.

Additionally, to alleviate any concerns of government and ensure integrity, a further caveat for Market Research Analyst could be developed to exclude duties associated with the following positions:

- Market Research Field Interviewer
- Data Entry
- Field Manager
- Coder

We would welcome the opportunity to refine these proposed caveats more fully with the Department and the Department of Home Affairs.

4. ANZSCO SYSTEM – CLASSIFICATION ISSUES

The current ANZSCO Market Research Analyst classification 225112 is currently defined as:

- Determines the market for new goods and services,
- develops advertising strategies, and
- evaluates the best business sites for commercial organisations.

As per our previous submission (appended), the market and social research industry is a service industry which relies on highly skilled, tertiary qualified, technical research practitioners. The technical skills are a cost of entry and these skills are not currently widely taught in most Australian, or global, tertiary institutions. As a result, talent is scarce both in Australia and internationally, meaning employers must actively compete for that talent and ultimately rely on visa holders.

We believe the current ANZSCO definition does not adequately describe the skilled workforce needs of the industry i.e. the level of professional, technical or communicative skills required by market and social research companies to fill these roles.

It should be noted that, given the level of expertise required in this industry, AMSRO member employers are using the ANZSCO Market Research Analyst position to fill mid to senior level vacancies.

A more accurate description of **Market Research Analyst** would include the following:

- Tertiary degree in a relevant discipline and 3+ years' experience
- Well-developed quantitative research skills including sampling, questionnaire design, statistical analysis, reporting and/or qualitative research skills, with a range of moderation techniques, methods and tools (including focus groups, in-depths, online groups).
- High level (quantitative) competency across data analytics, modelling and programming and/or (qualitative) ability to take live briefs, turn them into qualitative research designs and interpret findings accordingly.
- Superior leadership, presentation, story-telling and project management skills.
- Ability to run a project team and coordinate the workflows of other team members.

- Willingness to mentor and train other research and project support staff.
- Superior ability to use relevant software (SPSS, Microsoft Office (Word, Excel) and other packages relevant to projects, as necessary.
- Ability to document survey procedures and produce publication quality technical and methodological reports.

The appended (with updated data from May 2018) Skill Shortage table which lists vacancies member organisations have not been able to fill from the local labour market in the past 12 months, provides a snapshot of the specialist skills that are typically supplied by skilled workers on temporary visas.

5. FREQUENCY OF UPDATING THE LIST

As per our previous submission (appended) AMSRO commends the Department on its proposal to undertake stakeholder consultation and maintain transparency in its approach, however believes the frequency of list updates (and potential changes) presents major operational issues for employers. A successful business relies on having adequate planning time, sufficient headcount and the necessary infrastructure to ensure a client's needs are met.

CONCLUSION

In summary, Market Research Analyst and Marketing Specialist should be listed on the MLTSSL for the following reasons:

- Industry growth over the next five years requires an increased number of senior and experienced candidates.
- Evidence of the shortage shows job vacancies on the rise with no relief in sight.
- The industry which contributes one billion dollars per year to the economy relies on a small number of highly skilled specialists to supplement the local workforce by filling mid to senior roles, despite genuine and ongoing investment in capacity building.
- Market Research Analyst and Marketing Specialist roles at this level are typically left unfilled for over 6 months.
- Caveats may be implemented to ensure roles filled by visa holders are highly specialised.
- Listing the occupation on the MLTSSL provides the industry with the ability to recruit, compete and retain talent in a highly competitive global market.
- Research impacting government policy and critical business decisions will be accurately and expertly conducted by a robust Research Industry.

Appended:

- Skills Shortage table (attached separately)
- AMSRO submission (dated 1 December 2017 - attached separately)