

# **Jobs and Skills Australia**

## **2025-26 Work Plan Development**

**Submission – February 2025**

# Table of contents

<b>Acknowledgement of Country</b>	<b>3</b>
<b>Background</b>	<b>3</b>
<b>Strengthening Jobs and Skills Australia’s role</b>	<b>5</b>
Key Outcome 1. Fostering Inclusive Participation - broadening employment opportunities through identifying and removing barriers for people and communities	5
Key Outcome 2. Understanding today’s workforce – building the evidence base to inform and address current and emerging labour market and skills needs	6
Key Outcome 3. Shaping Australia’s future workforce – projecting forward to plan for the opportunities and challenges for our nation’s future workforce needs	8
Key Outcome 4. Optimising pathways and system architecture – monitoring, analysing and advising on the effectiveness of the national skills system	9
Key Outcome 5. Activating an informed dialogue – convening stakeholders across the skills system, to provide the best evidence and advice, on Australia’s current and future workforce and skills needs	10
Capacity and Cohort Studies	11
<b>Appendix: Job and Skills Australia’s opportunity to Activate Australia’s Skills</b>	<b>12</b>
A major overlooked issue: underutilisation of Australia’s skilled migrants	12

# Acknowledgement of Country

SSI acknowledges the Aboriginal and Torres Strait Islander peoples as the First Australians and Traditional Custodians of the lands where we live, learn and work. We pay respect to Elders past and present and recognise their continuous connection to Country.

## Background

SSI welcomes the opportunity to provide this submission to Jobs and Skills Australia's public consultation on its 2025-26 Work Plan.

SSI is a national non-for-profit organisation that delivers a range of human services that connect individuals, families, and children from diverse backgrounds with opportunities – including settlement support, disability inclusion programs, community engagement initiatives and training and employment pathways. At the heart of everything we do is a drive for equality, empathy, and celebration of every individual.

SSI was founded in Sydney in 2000 with the aim of helping newly arrived refugees settle in Australia. Over time, our expertise in working with people from diverse cultural and linguistic (CALD) backgrounds served as the foundation for a gradual expansion into other social services and geographical areas.

In 2018, SSI merged with Queensland-based Access Community Services, and in 2019 opened in Victoria, providing an extensive footprint across the eastern coast of Australia. In 2023-24, SSI supported more than 60,000 people across almost 60 programs and community-based services nationally. We are also a leading provider of evidence-based insights into the social sector and are known as an organisation that can reach communities considered by many to be 'hard to reach'.

SSI delivers several employment services programs funded by the Australian Government including the Disability Employment Services program and the Local Jobs Program. Until mid 2024, SSI delivered ParentsNext and the Home Care Workforce Support Program. Over 2017 – 2024, SSI delivered the Refugee Employment Support Program funded by the NSW Government. SSI is a Jobs Victoria partner, delivering tailored employment assistance to people from culturally and linguistically diverse (CALD) backgrounds in Western and Southern Melbourne.

Due to the locations where SSI deliver these programs, a large proportion of participants are from CALD and refugee backgrounds, and we also work with Aboriginal and Torres Strait Islander participants and others in these regions.

SSI is the convener of Activate Australia's Skills, a non-partisan campaign that is endorsed and supported by a wide cross-section of over 90 businesses, unions, social services and community organisations.<sup>1</sup> Our supporters represent interests from across the full spectrum of ideas and perspectives but are united in our desire to improve skills and qualifications recognition policy to address the workforce shortages in Australian communities, families and businesses.

The barriers within Australia's overseas qualifications recognition system that are preventing skilled migrants from working in their fields to alleviate skills shortages are outlined in the [Activate Australia's Skills Blueprint](#) report. To address this, Activate Australia's Skills is calling for the implementation of four key reforms:

- Establish one national governance system including an Ombudsman/Commissioner;

- Create a seamless process with reduced red tape;
- Remove cost and information barriers through financial support and an online portal;
- Set up migrant employment pathways hubs with skills recognition navigators to get qualified people working in their professions again.

It is from this perspective informed by several service delivery domains, that SSI contributes to this public consultation on the 2025-26 Work Plan.

SSI's submission responds mostly to Key Consultation 3 as it relates to all of the Work Plan's Key Outcomes.

# Strengthening Jobs and Skills Australia’s role

In response to Key Consultation Question 3, **SSI recommends that** Jobs and Skills Australia include the impact (or realisation) of the three key pillars (tertiary education, Vocational Education and Training [VET] and skilled migration)<sup>2</sup> on Australia’s current and future workforce, within Jobs and Skills Australia’s outcomes and 2025-26 Work Plan. In particular, consider the translation of Australia’s skilled migration program into labour market outcomes and migrant skills underutilisation as part of analysing labour market imbalances (which cuts across several functions outlined in Section 9 of the Jobs and Skills Australia Act 2022).

**SSI recommends that** each of the five Key Outcomes respectively include the following specific areas of focus:

## Key Outcome 1. Fostering Inclusive Participation - broadening employment opportunities through identifying and removing barriers for people and communities

- Consider specific barriers for skilled migrants, such those created by Australia’s system for recognising overseas skills and qualifications, as part of analysing labour market barriers impeding workforce participation. This system plays a critical role in realising the policy intent and goals of the skilled migration program, to address workforce skills shortages via tapping into the talents of overseas-trained migrants.
- Recommends Jobs and Skills Australia conduct cohort studies focused on migrant women specifically in its 2025-26 Work Plan. Migrant women are 1.2 times more likely to be underutilised compared to their male counterparts.<sup>3</sup> SSI appreciates our inclusion in a Jobs and Skills Australia facilitated stakeholder consultation in late 2024, where prioritising research of the barriers and opportunities related to women and intersectionality in relation to culturally and linguistically diverse women is being progressed.

*Response to specific Work Plan priorities*

Priorities		Key Consultation Question 3 - Missing key areas of focus
Key Outcome 1. Fostering inclusive participation		
Ongoing and emerging work (2024-25)	Providing regular insights on regional labour markets including	
	<ul style="list-style-type: none"> <li>• continuing the Regional Labour Market Indicator (RLMI) framework</li> </ul>	Regional labour markets should also track, where possible, level of underutilisation of both Australian-born and migrant workers; prioritised by skills in shortage across key industries

## Key Outcome 2. Understanding today’s workforce – building the evidence base to inform and address current and emerging labour market and skills needs

**SSI recommends that** Key Outcome 2 includes understanding employment outcomes for Australia’s skilled migrant workforce, including whether skilled migrants are working in the fields for which they were granted a skilled migration visa.

Further, **SSI recommends that** Jobs and Skills Australia’s commitment to supporting the Australian Government’s implementation of its Migration Strategy include providing analysis and advice on the issue of migrant skills underutilisation and potential solutions, including reforms to Australia’s system for recognising overseas skills, qualifications and experience. The Migration Strategy’s Action Plan specifically envisages this, stating the Australian Government’s commitment to, “improve the approach to skills recognition and assessment to better unlock the potential of migrants”; one key measure of which is to “Improve the approach to skills recognition and assessment to better unlock the potential of migrants”.<sup>4</sup> Working on the issue of migrant skills underutilisation and potential solutions, is integral to providing “robust intelligence on skills imbalances to ensure the system is aligned to address present and evolving skills needs”.<sup>5</sup>

*Response to specific Work Plan priorities*

Priorities	Key Consultation Question 3 - Missing key areas of focus	
<b>Key Outcome 2. Understanding today’s workforce</b>		
<b>Major Projects</b>	<b>Understanding labour market pressures and drivers</b>	
	<ul style="list-style-type: none"> <li>developing the Core Skills Occupations List for temporary skilled migration (annual)</li> </ul>	Add: analyse migration pathways against occupations in the Core Skills Occupations List and/or the Occupation Shortage List and the employment outcomes of skilled migrants (i.e. whether migrants are working at the skill level they were assessed and approved for in the migration pathway). This would offer more nuanced insights on skills shortages and areas of the workforce that could be better utilised  This broader scope aligns strongly with the Migration Strategy's direction that Jobs and Skills Australia in this area, "analyse whether migration is an appropriate path to address the identified shortages, considering how well migrants do in the labour market upon arrival" <sup>6</sup>
	<ul style="list-style-type: none"> <li>producing the Occupation Shortage List (annual)</li> </ul>	
	<ul style="list-style-type: none"> <li>publishing insights about skills shortage drivers, including new longitudinal data asset to better understand training gap and retention gap drivers</li> </ul>	The Work Plan states with respect to this priority, "Our preliminary analysis to date of skills shortage drivers has been based on numerous different datasets. Increased use of longitudinal data to assess labour market transitions will create a deeper understanding of where worker retention may play a significant role in skills shortages". <sup>7</sup> SSI suggests this work collate datasets and longitudinal data which examine skilled migrants’ underutilisation. Alternatively, a new priority should be created to scope how to collate this data

<b>Priorities</b>		<b>Key Consultation Question 3 - Missing key areas of focus</b>
<b>Key Outcome 2. Understanding today's workforce</b>		
<b>Ongoing and emerging work (2024-25)</b>	<b>Examining current and emerging labour market conditions through regular releases</b>	
	<ul style="list-style-type: none"> <li>•Survey of Employers who Recently Advertised (SERA)</li> <li>•The Occupation Shortage Report</li> <li>•Recruitment Experiences and Outlook Survey (REOS)</li> <li>•Recruitment Insights Report</li> <li>•Internet Vacancy Index (IVI)</li> <li>•Nowcast of Employment by Region and Occupation (NERO)</li> <li>•Small Area Labour Markets</li> <li>•Australian Labour Market for Migrants</li> <li>•Quarterly Labour Market Update</li> <li>•International Labour Market Update</li> <li>•Jobs and Skills Atlas (annual)</li> </ul>	<p>Consideration should be made to analyse the level of underutilised skilled migrants by skill level, occupation and industry for each regular release, where appropriate</p>

## Key Outcome 3. Shaping Australia’s future workforce – projecting forward to plan for the opportunities and challenges for our nation’s future workforce needs

The underutilisation of skilled migrants presents a current challenge but a significant future opportunity for Australia’s workforce. Improving the transition and outcome of skilled migrants into the labour market would allow more workers to fully participate in the labour market, be more productive and increase the resilience, diversity and adaptability of Australia’s future workforce to changing global contexts. This would also improve Australia’s international competitiveness in attracting and retaining global talent for emerging skills and industries. **SSI recommends that** Jobs and Skills Australia prioritise this issue in the 2025-26 Work Plan.

*Response to specific Work Plan priorities*

Priorities	Key Consultation Question 3 - Missing key areas of focus	
<b>Key Outcome 3. Shaping australia’s future workforce</b>		
	<b>Developing a forward outlook of workforce and skills needs</b>	
<b>Major Projects</b>	<ul style="list-style-type: none"> <li>• Building a national skills supply and demand framework to assess the supply of skills across the economy over time and identify future supply</li> </ul>	<p>This national skills supply and demand framework must also include tracking and analysing supply with respect to level of skilled migrants working in roles that fully reflect their skills and qualifications; including the extent and levels of underutilisation, (i.e. how many skill levels lower is a person working)</p>
<b>Ongoing and emerging work (2024-25)</b>	<ul style="list-style-type: none"> <li>• Leveraging our analytic insights to support initiatives relating to the Employment White Paper, Future Made in Australia, Homes for Australia Plan, care and support economy, clean energy and net zero transformation, digital transformation and defence industry, the VET Workforce Blueprint, the National Agreement on Closing the Gap, the Australian Disability Strategy, and the Working for Women National Gender Strategy - <b>Note, capacity studies are considered key focus for Key Outcome 3</b></li> </ul>	<p>Refer to Capacity and Cohort Studies section below</p>

## Key Outcome 4. Optimising pathways and system architecture – monitoring, analysing and advising on the effectiveness of the national skills system

SSI recommends that this outcome should be broadened to include analysing, assessing and monitoring the efficacy of the interaction and connection between Australia’s migration skills assessment system and the (onshore) overseas skills and qualifications recognition system for employment purposes. Taking a holistic lens is key to realising the policy intent of Australia’s skilled migration program. This is aligned with the scope envisaged by the Migration Strategy, which states:

*“the key body for advising on Australia’s skills needs, Jobs and Skills Australia will help ensure local workers’ skills and job opportunities are prioritised, and the migration system is guided to areas of best use. **Jobs and Skills Australia’s role in the migration system will mature over time and will look to take into account not just the ‘what’ and ‘where’, but also the ‘why’ and ‘how’ with respect to occupations in shortage. This will help ensure migration complements the domestic skills and training system.**”<sup>8</sup> (SSI bold text)*

Response to specific Work Plan priorities

Priorities	Key Consultation Question 3 - Missing key areas of focus	
<b>Key Outcome 4. Optimising pathways and system architecture</b>		
<b>Major Projects</b>	<b>Driving a connected skills system and supporting delivery of reforms to the national skills architecture</b>	
	<ul style="list-style-type: none"> <li>consulting on the approach to develop a national skills taxonomy</li> </ul>	While SSI recognises that the national skills taxonomy’s intention is to "underpin an integrated tertiary system, and help Australia understand and keep pace with rapidly changing skills needs", <sup>9</sup> this taxonomy should be expanded to employment systems also, including its use in occupational licensing and registration and the recognition of overseas acquired skills
	<ul style="list-style-type: none"> <li>assisting with developing and reporting against an outcomes framework for the National Skills Agreement#</li> </ul>	Such an outcomes framework must also include tracking outcomes with respect to the extent that skilled migrants work in roles/at the skill level they were granted skilled visas for and the levels of underutilisation (i.e. how many skill levels lower is a person working)
<b>Ongoing and emerging work (2024-25)</b>	<b>Enabling responsive pathways and labour market transitions</b>	
	<ul style="list-style-type: none"> <li>providing advice to support implementation of Australia’s Migration Strategy and International Education and Skills Strategic Framework</li> </ul>	This should include analysing, assessing and monitoring the efficacy of the interaction and connection between Australia’s migration skills assessment system and the onshore skills and qualifications recognition system for employment purposes. Taking a holistic lens is key to realising Australia’s skilled migration program’s policy intent. This aligns with the Migration Strategy <sup>10</sup>
	<ul style="list-style-type: none"> <li>producing datasets to map VET and higher education pathways into occupations</li> </ul>	Datasets should also be produced to map migration pathways into occupations and to identify skilled migrants' employment outcomes

## Key Outcome 5. Activating an informed dialogue – convening stakeholders across the skills system, to provide the best evidence and advice, on Australia’s current and future workforce and skills needs

Australia’s underutilisation of migrant skills ranks fifth highest among OECD countries.<sup>11</sup> **SSI recommends that** Jobs and Skills Australia should facilitate cross-sector discussion and reflection on this issue (involving industries, businesses, unions, education institutions and migrant communities), as part of Jobs and Skills Australia’s approach on this outcome.

The scale of Australia’s underutilisation of its skilled migrants already in the country is not investigated or monitored on an ongoing basis at a cross-sector, cross-industry and economy-wide level. Jobs and Skills Australia is uniquely positioned to do this through its 2025-26 Work Plan. By doing so, Jobs and Skills Australia can play a critical role in raising awareness of a major, overlooked and untapped gap in the functioning of Australia’s labour market, and that of the skills and migration systems. Analysis and advice on this issue would greatly support decision makers to make policy and program reforms that in reality, translate to employment outcomes that fully utilise migrant’s skills.

### Response to specific Work Plan priorities

Priorities	Key Consultation Question 3 - Missing key areas of focus	
<b>Key Outcome 5. Activating and informed dialogue</b>		
<b>Major Projects</b>	<b>Leading the conversation on workforce and skills issues</b>	
	<ul style="list-style-type: none"> <li>publishing the 2024 Jobs and Skills Report</li> </ul>	Going forward, Jobs and Skills reports should include analysis and insights on the scale and impact of migrants’ skills underutilisation. Raising awareness of this would also contribute towards further dialogue from all stakeholders to address this issue
	<b>Collaborating for impact and workforce capability development</b>	
	<ul style="list-style-type: none"> <li>sharing data and insights with Jobs and Skills Councils and partnering on national priorities and relevant projects</li> </ul>	Broadening data and insights shared to Jobs and Skills Councils to include the issue of migrants’ skills underutilisation and opportunities to improve Australia’s occupational licensing and registration system and recognition of overseas skills qualifications, will enable Councils to provide input on addressing this issue for their respective industries
<ul style="list-style-type: none"> <li>working with states and territories on new data tools and relevant projects</li> </ul>	Jobs and Skills Australia is asked to work with states and territories on identifying opportunities to develop new data tools and relevant projects to better measure and track the employment outcomes of skilled migrants (including those on state-sponsored visas) and monitor the issue of skilled migrants’ underutilisation across jurisdictions	

## Capacity and Cohort Studies

With respect to the Work Plan's capacity and cohort studies, **SSI recommends that** Jobs and Skills Australia's scope of work be expanded to examine the level of underutilisation of migrant women's skills as part of the assessing women's economic equality and safety project which is currently underway. Examining the role and impact of Australia's system for recognising overseas skills, qualifications and experience on migrant women's employment outcomes should also be included. Migrant women are 1.2 times more likely to be underutilised compared to their male counterparts.<sup>12</sup> NATSEM research has found that while the longer a migrant or refugee woman has been in Australia, the more likely she is to be employed, the less likely to be unemployed and the more likely to participate in the labour force, this is unlikely to be at a level commensurate with her skills and qualifications.<sup>13</sup>

**Authorised by:** Sandy Fitter, Group Head, Stakeholder Relations, Research and Policy

**Contact:** Tri Nguyen, Social Policy Lead, [tringuyen@ssi.org.au](mailto:tringuyen@ssi.org.au)

**Date:** 25 February 2025

# Appendix: Job and Skills Australia's opportunity to Activate Australia's Skills

Jobs and Skills Australia's remit, to help "boost Australia's productivity and economic health, by leading research and analysis"<sup>14</sup> places it in a prime position to highlight the opportunity for decision makers to both address Australia's skills shortages and the protracted underutilisation of Australia's overseas trained workforce.

## A major overlooked issue: underutilisation of Australia's skilled migrants

The cost of living is rising, waiting lists for essential services are getting longer, productivity has flatlined and businesses cannot find the workers they need.<sup>15</sup> The solution: activate Australia's overseas-trained workforce to boost the supply of much-needed skills.

Right now, almost half (44%) of qualified permanent migrants in Australia are unable to work in their fields. This equates to over 620,000 people who are working below their level of skill and qualification – while we have critical worker shortages.<sup>16</sup> Of this group, 3 out of 5 (60%) arrived through the skilled migration stream.<sup>17</sup> Women are 1.2 times more likely to be underutilised than men.<sup>18</sup> The skills mismatch is not due to the fields in which migrants are qualified. In fact, the skills in demand by Australian industries have strong alignment with the skills of Australia's permanent migrants – the top five qualifications underutilised migrants hold include Management/Commerce, Engineering and Related Technologies, Health and Information Technology.<sup>19</sup> Skills shortages are a bottleneck on economic growth and significantly impact local communities and businesses. According to Deloitte Access Economics, **\$9 billion could also be added to Australia's economy each year if permanent migrants living in Australia worked in jobs that matched their skills at the same rate as Australian-born workers.** This would help boost productivity and increase the overall workforce at an industry level.<sup>20</sup>

Most discussion of migration as a response to labour and skills shortages focusses on policies to increase the number and assessment of migrants coming into the country. The assumption made is that once skilled migrants enter the country, they will automatically fill the workforce shortages. This clearly does not occur. This is a lost opportunity as many migrants and refugees who are already here are under-employed or working in positions well below their skill and qualification level (even if they are in paid work). Australia's percentage of workers who are mismatched between their skills and job requirements has historically been higher than other OECD countries.<sup>21</sup>

Australia's bureaucratic and expensive system for recognising overseas skills and qualifications and the disconnect between migration and employment systems are major drivers of migrant skills underutilisation. Successive governments have tinkered with the system, creating sporadic, incremental and short-term changes or exceptions for certain industries or professions, when system-wide reform is needed.<sup>22</sup>

Jobs and Skills Australia can play a major role in investigating and advising decision makers on the scale of the problem of Australia's underutilisation of skilled migrants and provide policy recommendations that will both alleviate this issue and skills shortages.

## References

- <sup>1</sup> Activate Australia's Skills. (2024). *Activate Australia's Skills – About*. Retrieved from <https://activateaustralia.org.au/about/>
- <sup>2</sup> Jobs and Skills Australia. (2024). *Context – the role of Jobs and Skills Australia*. Retrieved from [https://www.jobsandskills.gov.au/publications/towards-national-jobs-and-skills-roadmap-summary/context#:~:text=Three%20key%20pillars%20of%20the%20national%20skills%20system%20are%3A%20vocational%20education%20and%20training%20\(VET\)%2C%20higher%20education%2C%20and%20migration%20\(Figure%201\).](https://www.jobsandskills.gov.au/publications/towards-national-jobs-and-skills-roadmap-summary/context#:~:text=Three%20key%20pillars%20of%20the%20national%20skills%20system%20are%3A%20vocational%20education%20and%20training%20(VET)%2C%20higher%20education%2C%20and%20migration%20(Figure%201).)
- <sup>3</sup> Activate Australia's Skills. (2024). *Activate Australia's skills handout*. Op. cit.
- <sup>4</sup> Australian Government. (2024). *Migration Strategy - Action Plan*. Retrieved from <https://immi.homeaffairs.gov.au/programs-subsite/migration-strategy/Documents/migration-strategy-action-plan.pdf>
- <sup>5</sup> Ibid.
- <sup>6</sup> Australian Government. (2024). *Migration Strategy: Getting migration working for the nation. For workers. For businesses. For all Australians*. Retrieved from <https://immi.homeaffairs.gov.au/programs-subsite/migration-strategy/Documents/migration-strategy.pdf>
- <sup>7</sup> Jobs and Skills Australia. (2024). *Jobs and Skills Australia Work Plan 2024-25*. Retrieved from <https://www.jobsandskills.gov.au/download/19684/2024-25-work-plan/2866/jobs-and-skills-australia-2024-25-work-plan/pdf>
- <sup>8</sup> Australian Government (2024). *Migration Strategy: Getting migration working*. Op. cit.
- <sup>9</sup> Jobs and Skills Australia. (2024). *Work Plan 2024-25*. Op. cit.
- <sup>10</sup> Australian Government (2024). *Migration Strategy: Getting migration working*. Op. cit.
- <sup>11</sup> Barker, A. (2022). *Skills Recognition 2022*. Committee for Economic Development of Australia. Retrieved from <https://cedakenticomedia.blob.core.windows.net/cedamediatest/kentico/media/attachments/ceda-skills-recognition.pdf>
- <sup>12</sup> Activate Australia's Skills. (2024). *Handout*. Op. cit.
- <sup>13</sup> Batainah, H. S., Hawkins, J., & Miranti, R. (2022). *Untapped potential: trends and disparities in the economic participation of migrant and refugee women in Australia*. NATSEM/Settlement Services International. Retrieved from [https://apo.org.au/sites/default/files/resource-files/2022-12/apo-nid321021\\_1.pdf](https://apo.org.au/sites/default/files/resource-files/2022-12/apo-nid321021_1.pdf)
- <sup>14</sup> Jobs and Skills Australia (2025). *Jobs and Skills Australia 2025-26 Work Plan development Public consultation paper January 2025*. Retrieved from [https://www.jobsandskills.gov.au/sites/default/files/2025-01/jobs\\_and\\_skills\\_australia\\_2025-26\\_work\\_plan\\_development\\_-\\_public\\_consultation\\_paper.docx](https://www.jobsandskills.gov.au/sites/default/files/2025-01/jobs_and_skills_australia_2025-26_work_plan_development_-_public_consultation_paper.docx)
- <sup>15</sup> Jiang, L., & Nguyen, T. (2024). *Skilled & ready: A blueprint for activating Australia's overseas-trained workforce*. Retrieved from [https://activateaustralia.org.au/wp-content/uploads/2024/10/Activate-Australia-Skills\\_Blueprint-for-Reform\\_Oct-2024\\_WEB-1.pdf](https://activateaustralia.org.au/wp-content/uploads/2024/10/Activate-Australia-Skills_Blueprint-for-Reform_Oct-2024_WEB-1.pdf)
- <sup>16</sup> Deloitte Access Economics. (2024). *Billion Dollar Benefit: The economic impact of unlocking the skills potential of migrants in Australia*. Retrieved from [https://www.ssi.org.au/wp-content/uploads/2024/06/DAE\\_SSI\\_Skills\\_Mismatch\\_Report\\_19062024\\_WEB.pdf](https://www.ssi.org.au/wp-content/uploads/2024/06/DAE_SSI_Skills_Mismatch_Report_19062024_WEB.pdf)
- <sup>17</sup> Ibid.
- <sup>18</sup> Activate Australia's Skills. (2024). *Handout*. Op. cit.
- <sup>19</sup> Ibid.
- <sup>20</sup> Ibid.
- <sup>21</sup> Ibid.
- <sup>22</sup> Jiang & Nguyen (2024). Op. cit.