

31 March 2021

**Mr Phindiwe Mbhele**  
**Director-General**  
**Department of Home Affairs**  
17<sup>th</sup> Floor, 236 Johannes Ramokhoase  
Pretoria  
0001

By e-mail: [cswv@dha.gov.za](mailto:cswv@dha.gov.za)

Dear Mr Mbhele

## **WRITTEN SUBMISSION ON THE DRAFT CRITICAL SKILLS LIST (44164)**

### **1. BUSINESS UNITY SOUTH AFRICA (“BUSA”)**

Business Unity South Africa (BUSA) is a confederation of business organisations including chambers of commerce and industry, professional associations, corporate associations and unisectoral organisations. It represents South African business on macro-economic and high-level issues that affect it at the national and international levels. BUSA’s function is to ensure that business plays a constructive role in the country’s economic growth, development, and transformation and to create an environment in which businesses of all sizes and in all sectors, can thrive, expand and be competitive.

As the principal representative of business in South Africa, BUSA represents the views of its members in a number of national structures and bodies, both statutory and non-statutory. BUSA also represents businesses’ interests in the National Economic Development and Labour Council (NEDLAC). Internationally, BUSA is a member of the International Organisation of Employers (IOE), the Pan-African Employers’ Confederation (PEC) the Africa Employers’ Group and the Southern Africa Development Community (SADC) Employers’ Group. BUSA is also the official representative of business at the International Labour Organisation (ILO), the African Union (AU) Social Affairs Commission, B-20, the Organisation for Economic Cooperation and Development (OECD) and World Trade Organisation.

### **2. Introduction**

Business thanks the Department of Home Affairs for the opportunity to provide comments on the Draft Critical Skills List (2020). The Draft Critical Skills List is of importance to Business as it informs labour migration and Business access to work permits in order to hire skilled foreign nationals. We believe that The List is crucial to the Private sector and there is significant risk to excluding Critical Skills that will unlock growth at scale. Business is of the view that clarity is needed regarding omissions in the Critical Skills List especially in instances

where sectors are unable to unlock and attract new business into the country due to critical skills being omitted from the Critical Skills List despite meeting the definition.

We note that a number of our members have participated extensively in the Department of Higher Education, Science and Technology consultation processes for the Occupations in Higher Demand; Priority Occupations List and the Critical Skills List and have appreciated the collaborative and constructive nature of these engagements.

**3. BUSA members have identified the areas below that require further clarity:**

1. Technical Report for the 2020 Critical Skills List: This list was submitted by the Department of Higher Education, Science and Technology to the Department of Home Affairs without due consultation with business after it has been published in November 2020.
2. Clarity on Expanded Definitions for Critical Skills: Clarity is required on whether the expanded definitions defined in the Occupation in Higher Demand List extends to the current Draft DHA Critical Skills List (with implications that Skills currently identified as being left off the Critical Skills List could indeed be included).
3. Sector insights as well as subject matter expertise are required to correct erroneous NQF levels such as External Auditors at NQFL7.
4. We note that there are several different pathways into a working role in which a person builds the right expertise and skills for a job but are not necessarily matched with an accredited certificate or qualification. Many of these individuals would therefore not be supported in their application with the criteria set out in the Draft Critical Skills List (2020).

**4. Critical Skills Omissions**

BUSA canvassed its members, received the below submissions and would like to note that the list is not intended to be exhaustive. Our members will be submitting detailed and sector-specific input to the Department of Home Affairs.

OFO Code	Occupation	Professional Body
2015-653101	Automotive Motor Mechanic	
2015-651202	Welder	
2015-312201	Production/Operations Supervisor (Manufacturing)	

2015-832901	Metal Engineering Process Worker	
2015-651302	Boiler Maker	
2915-671101	Electrician	
2015-721901	Product Assembler	
2015-653306	Diesel Mechanic	
2015-653303	Mechanical Fitter	
2015-214101	Industrial Engineer	
Not Assigned	Foreign Language or Multilingual skills	
251203	ICT Developer	Information Technology Professionals SA (preferable)
2019-134205	Clinic Manager (specialised Health Service)	Health Professions Council of South Africa
2019-331101	Dealer	Merger and Acquisition Principal
2019-331201	Credit Analyst	Senior Credit Analyst/Manager
2019-341110	Associate Legal	Legal Advisor
2017-263101	Development Finance Project Analyst/specialist	Chartered Institute of Development Finance
2017-242402	Specialist product trainer	All relevant professional bodies.
2019-422202	Inbound contact centre consultant Specialisation:	This occupation is currently referenced as requiring a qualification equal to an NQF Level 2, however the same

	<p>Multilingual voice and non-voice contact centre consultant for the following languages:</p> <ul style="list-style-type: none"> <li>• Swahili</li> <li>• Portuguese</li> <li>• German</li> <li>• Swiss</li> <li>• Flemish</li> <li>• Greek</li> <li>• Swedish</li> <li>• Dnaish</li> <li>• Italian</li> <li>• Dutch</li> <li>• Spanish</li> <li>• Manderin</li> <li>• French</li> </ul>	<p>level of education and aptitude is required of inbound contact centre consultants as outbound contact centre consultants which is between an NQF Level 4, 5 &amp; 6 qualification</p> <p>All relevant professional bodies.</p>
2019-422202	<p>Outbound contact centre consultant</p> <p>Specialisation: Multilingual voice and non-voice contact centre consultant for the following languages:</p> <ul style="list-style-type: none"> <li>• Swahili</li> <li>• Portuguese</li> <li>• German</li> <li>• Swiss</li> <li>• Flemish</li> <li>• Greek</li> <li>• Swedish</li> <li>• Danish</li> <li>• Italian</li> <li>• Dutch</li> <li>• Spanish</li> <li>• Mandarin</li> <li>• French</li> </ul>	<p>This occupation requires a qualification level between NQF Level 4-6.</p>
2019-251202	<p>Programmer Analyst:</p> <p>While this occupation is currently included on the DHA Draft CSL, it has not been made clear whether or not the alternative titles or specialisation delineated in the Government Gazette Vol. 662 No. 43621 17 August 2020 (DHET) are formally adopted and therefore include:</p> <p>Business Analyst</p>	<p>All relevant professional bodies.</p>

2019-133102	<p>ICT Project Manager:</p> <p>Currently this is strictly accommodated within ICT, yet Project Managers are critical skills within Global Business Services including the need for project managers in contact centre operations including legal specific project managers</p>	All relevant professional bodies.
2019-251201	<p>Software developer</p> <p>The Global Business Services sector requires the accommodation of specialisation DevOps Engineer not currently included as an alternative title or specialisation</p>	All relevant professional bodies.
2019-252101	<p>Database Designer and Administrator</p> <p>The Global Businesses Services sector requires the accommodation of specialisation NoSQL Data Architects / Developers as a specialisation which is not currently a specialisation or alternative title</p>	All relevant professional bodies.
2019-252301	<p>Computer Network and Systems Engineer</p> <p>While this occupation is currently included on the DHA Draft CSL, it has not been made clear whether or not the alternative titles or specialisation delineated in the Government Gazette Vol. 662 No. 43621 17 August 2020 (DHET) are formally adopted and therefore include:</p> <p>Cisco Engineer</p>	All relevant professional bodies.
2019-216602	<p>Illustrator</p> <p>While this occupation is currently included on the DHA Draft CSL, it has not been made clear whether or not the alternative titles or specialisation delineated in the Government Gazette Vol. 662 No. 43621 17 August 2020 (DHET) are formally adopted and therefore include:</p> <p>Gamification illustrator (or specialist)</p>	All relevant professional bodies.
2019-251202	<p>Programmer Analyst</p>	All relevant professional bodies.

	<p>While this occupation is currently included on the DHA Draft CSL, it has not been made clear whether or not the alternative titles or specialisation delineated in the Government Gazette Vol. 662 No. 43621 17 August 2020 (DHET) are formally adopted and therefore include:</p> <p>Cloud Architect</p>	
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#### 5. New Roles:

OFO Code	Occupation	Professional Body
	Artificial Intelligence Specialist	
	Sales Director	No
	Marketing Director	No
	Manufacturing Director	Engineering Society
	Customer Service & Logistics Director	No
	Digital Commercial Director	No
	E-Commerce Director	No
	Finance Director	CA Institute
	General Manager	No
	Data Scientist Manager	No
	Legal Specialists with International Regulatory Experience	No
	Contact Centre Director	All relevant professional bodies.
	Digital and Transformation Manager (Six sigma specialist)	All relevant professional bodies.

**6. Included roles with current minimum qualification requirement issues:**

2019-241102	Management Accountant  Specialisation: Chartered Finance Analyst (CFAs)/ Financial Analysts Requirements for experience with international tax has been an issue with the critical skills visa related to this occupation.	All relevant professional bodies.
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**7. Conclusion**

In a rapidly changing labour market, with many businesses striving for economic recovery and sustainability, cognisance needs to be taken of the new world of work and how work is evolving. The impact on this critical skills list, is that due to the labour market changes, skills need to maximise opportunities which may arise, may not yet have been recognised.

BUSA trusts that DHA recognises the challenges and changes faced by many sectors, and DHA adopts a flexible and agile approach to emerging and new critical skills requirements, to enable economic growth, which may not have been articulated in this process, and is responsive to these needs. BUSA appreciates the opportunity provided by the Department of Home Affairs to provide into the Draft Critical Skills List (2020).

Kind regards



**Cas Coovadia**  
Chief Executive Officer