

RESPONSE TO THE DEPARTMENT OF EDUCATION, SKILLS AND EMPLOYMENT CONSULTATION PAPER FOR THE NEW AUSTRALIAN STRATEGY FOR INTERNATIONAL EDUCATION 2021–30

18 May 2021

Universities Australia welcomes the opportunity to make a submission to the Council for International Education's consultation process for the development of the new Australian Strategy for International Education 2020-30. Universities Australia is the peak body representing Australia's 39 comprehensive universities.

This submission is comprised of three parts:

- **Part 1** is Universities Australia's overarching submission addressing the range of issues pertinent to the university sector.
- **Part 2** outlines suggested goals and recommendations for the Strategy.
- **Part 3** responds to the discussion questions posed in the Department of Education, Skills and Employment consultation paper.

PART 1: A NEW AUSTRALIAN STRATEGY FOR INTERNATIONAL EDUCATION

INTRODUCTION

The story of international education in Australia is not restricted to the most recent few decades. The internationalisation of the Australian education industry started in 1923 with the arrival of N.Y Shah, a student from China who studied teaching at The University of Sydney. Following this modest start, Australia experienced a steady flow of students from a range of countries in the Asia Pacific region throughout the 1950s and 1960s. Many of these students started their Australian education experience at an Australian school, then sat matriculation exams and embarked on a course of university study. By 1966, international students comprised 8.9 per cent of full-time university students. Immigration settings were such that students who had lived in Australia for five years were eligible to apply for Australian citizenship¹.

This influx of private overseas students coincided with the launch of the Colombo Plan in 1951. The plan was designed to strengthen and promote partnerships within Asia and the Pacific, contribute to regional stability as well as contribute towards social and economic development in the area.

¹ <https://theconversation.com/how-universities-came-to-rely-on-international-students-138796>

Subsequent government inquiries further ratified objectives to be adopted by the Australian Government that cemented Australia's position as a leading destination for international students. This included adopting policies that would:

- contribute to the social and economic development of people and institutions in developing countries, especially those in the Asia and Pacific region, by granting them access to Australia's education and training resources;
- increase cultural exchange and to improve the quality of Australia's educational and training resources; and
- serve Australia's interests by improving communication and understanding of Australia.

Educational aid was seen as a reliable and effective way to build ties with countries within the region. Over time scholarship programs were extended to additional countries beyond the original Colombo Plan area. While students gained an education in a wide range of subjects, from practical qualifications such as agriculture and infrastructure construction, courses in science, engineering, health and education accounted for more than 70 per cent of students during the 1950s and 60 per cent in the 1960s. The Colombo Plan was widely viewed as a means to 'generate goodwill and prestige for Australia', as 'returning students had 'something of a snowball effect' as they took up positions of influence'².

Embracing the educational aid aspect of the Colombo Plan and the increasing number of private international students in Australia throughout the 1950s and 1960s also brought benefits to the population at home, broadening Australians' perspectives of our neighbours and helped to shape reforms that were the precursor to the cessation of the White Australia policy³. Menzies noted in his memoirs that 'daily association of Australians with students and scholars from Asian countries has greatly widened the experience and understanding of our own people'⁴.

By the time the Colombo Plan wound up in the early 1980s, more than 20,000 Colombo Plan students had studied in Australian institutions. These students took their newly acquired skills and knowledge back to their home countries, making valuable contributions around the region, or migrated to Australia permanently under skilled migration programs.

Since then, the economic benefits of international education have dominated the conversation and taken precedence over the other meaningful contributions made by international students to both the sector and the broader community. This fixation on economic benefits of international education represents a significant shift from the sector's aid-driven origins and the desire to contribute to regional stability and to provide a greater understanding of Australia in the region.

Looking to our region and embracing a return to these original driving factors behind the internationalisation of Australia's education sector would provide a solid foundation for the new international education strategy. There's no doubt that the international education sector has made a significant/substantial contribution to Australia's economy during recent decades, but it is perhaps timely to now reframe the narrative to focus once again on the broad social benefit that education brings, not just to individual students, but their communities and nations.

CONSIDERATIONS FOR THE STRATEGY'S DEVELOPMENT

Two-phase approach – recovery, then stability and growth

The development of the new Australian Strategy for International Education 2021–30 (the Strategy) provides an opportunity to reshape the future of international education at a time where the importance and value of the sector to Australia as a country has been made painfully clear. The impacts of the COVID-19

² <https://press-files.anu.edu.au/downloads/press/p52161/pdf/book.pdf>, pp. 151-2; 181-182

³ *Ibid.*, p. 212-3

⁴ R.G. Menzies, *The measure of the years*, London, Cassell, 1970, p. 48, In <https://press-files.anu.edu.au/downloads/press/p52161/pdf/book.pdf> p. 213

pandemic have hit the sector hard, with repercussions being felt throughout the country. Students, institutions, accommodation providers, as well as tourism and other businesses who provide services for and benefit from international students have all been significantly affected. Student enrolments, and more critically, commencements, are down, accommodation buildings are lying dormant, small businesses dependent upon international students are suffering and in some cases closing down. Given the immediacy of the COVID-19-induced crisis, the Strategy must include a focus on short-term measures that will enable the sector to recover and rebuild a strong platform for stability and growth.

Short-term measures to support and revitalise the sector must be complemented with a balanced strategic approach that is also bold and forward thinking. Focusing primarily on future-proofing Australia's international education sector against a future pandemic-like event may result in a Strategy that lacks the foresight necessary to position Australia as a destination of choice for future generations of international students.

The Strategy must be developed within a context that acknowledges the stark contrast between the current state of crisis and the sector's track record of growth and success over the past several decades. Pre-pandemic, the sector educated 756,636 students in Australia in 2019⁵ and contributed \$40.3 billion to the Australian economy during that same year⁶. The sector directly or indirectly supports almost 250,000 jobs across the nation⁷.

The real and immediate challenges facing the sector must be acknowledged within the context of this previous success. Approaching the new Strategy from the perspective that the basic model of international education in Australia is broken is not warranted, nor will it be constructive for the sector. Rather, the Strategy must acknowledge the basis of the sector's success, and establish medium- to long-term goals that will facilitate stability and/or growth within the post-COVID-19 landscape. This landscape will be dramatically altered, and the Strategy must incorporate a robust understanding of how both traditional and non-traditional source countries will be affected, including their appetite and capacity for an overseas education experience.

Acknowledging the sector's complexity and heterogeneity will also be critical to developing an effective new Strategy – a 'one-size-fits-all' approach is unlikely to be suitable. The various educational offerings and student cohorts that the various areas of the sector cater to have a diversity of needs and challenges that will require a similarly diverse range of support.

Diversification

In a system that currently attracts students from more than 140 different countries, it is not clear what a focus on greater diversification would entail in practice. The Strategy must clearly define this before any strategic goals can be set, let alone implemented. Does diversification mean a significant increase in students from non-traditional source countries, with an overall increase in total student numbers? Or, a redistribution of the ratio of students from the current two leading source markets to those from other countries? Either of these scenarios will likely be challenging to implement, particularly in a post-COVID-19 environment.

The sector operates under market conditions, providing education according to demand. It may not be possible to dramatically alter the composition of the international student population if demand for an Australian education experience remains high.

Pre-COVID-19, a concern raised by some commentators was a perceived 'over-reliance' on students from China. In 2019, students from China accounted for 37 per cent of all international students in Australia.

⁵ <https://internationaleducation.gov.au/research/datavisualisations/Pages/Student-number.aspx>

⁶ <https://internationaleducation.gov.au/research/research-snapshots/Documents/RS%20Education%20export%202019.pdf>

⁷ https://internationaleducation.gov.au/research/research-snapshots/Documents/RS_Export%20income%20infographic%202019.pdf

However, data collated by UNESCO shows that Chinese students account for a similar proportion of the international student cohort in the UK, the US, Canada and New Zealand⁸.

While no one expected or predicted the disruption the sector has experienced during the past 18 months, it is worth noting that Chinese students are the only cohort whose enrolments have shown resilience through the pandemic. Aggregate data across the university sector indicates that 2021 commencements of students from China were higher than in 2020 (possibly in part due to a large number of deferrals in 2020), while there were significant decreases in commencements of students from other countries. While this signal is by no means consistent across the sector, with solid figures from a small number of institutions distorting the decrease in numbers seen in the majority of universities, it is clear that the Chinese student cohort has in fact become even more important to some parts of the university sector.

Expanding the numbers of students from non-traditional source countries will require a concerted and consistent Commonwealth Government effort. As the only actor with an established presence across the globe, this network will need to be deployed to promote a unified and consistent message. A key consideration could be whether the Department of Education, Skills and Employment's (DESE) Education Counsellor network is optimally arranged, with Counsellors in the right places.

Prior to Austrade assuming responsibility for promoting international education, this role was carried out by Australia Education International (AEI), which had developed a depth of knowledge and understanding of the sector. Given the unique and specific characteristics of international education compared to other aspects of Australia's trade offerings, revisiting the model under which AEI operated could also be considered.

With respect to diversifying the course offerings for international students, it is again important to understand that international education operates under free market conditions. Providers respond to the needs of prospective students and their parents. Students will make rational decisions according to their own self-interest and those interests are driven by a range of factors, the majority of which sit outside the influence of providers.

Offshore/online delivery and transnational education

There is a significant focus upon offshore and online delivery in the materials produced for the Strategy consultation. Universities Australia is concerned that undue emphasis is being placed on this mode of delivery. While universities and other providers performed a rapid pivot to online delivery during the early stages of the COVID-19 pandemic, this was done out of necessity, in the face of a crisis that presented challenges of a scale and nature surpassing any others the sector has endured.

While hybrid and blended models do offer some flexibility and versatility to both providers and students, they cannot entirely replace a traditional in-country, in-person learning experience for international students. An Australian education experience provides students with a high-quality qualification, but an important draw card for Australian international education is the opportunity to learn and live in Australia, to enjoy and explore our country, embrace our unique lifestyle, and become a part of our community.

It cannot be assumed that Australian international education can retain the same level of cachet through online delivery to students located offshore. Even the simple practicalities, such as differences in time zones, of delivering high quality education products to students both onshore and offshore would present major obstacles. Rigorous analysis of both students' and providers preferences and capabilities is required to support any proposition of expanded offshore and online delivery.

Should diversification include expanded transnational education (TNE) and joint program offerings, it is essential to first determine if there is adequate demand for this type of education offering. Transnational education is expensive and challenging to establish, and presents a significantly greater risk to providers than educating students onshore in Australia.

⁸ <http://uis.unesco.org/en/uis-student-flow#slideoutmenu>

There is currently a lack of evidence to support providers making significant undertakings in this area, including analysis of:

- levels of risk associated with TNE;
- current and potential demand for TNE offerings in various countries;
- return on investment and profitability; and
- participation levels and accessibility of TNE offerings.

The analysis should also include investigation of the regulatory and policy settings both in Australia and other countries and where government efforts would be best placed to remove barriers and support greater engagement between Australian institutions and overseas partners.

It must also be acknowledged that TNE is not a viable option for all providers. Some universities have already made considerable efforts to establish TNE ventures in various countries, while other universities are simply not in a position to dedicate the significant resources needed to build an overseas presence. As such, TNE must be seen as an addition to onshore provision of international education, rather than a replacement. It is also worth noting that around 60 per cent of international students' economic contribution is made through spending on their accommodation and living costs while in Australia⁹.

Cohesion across government

There are multiple government departments that have a role to play in international education, including DESE, the Department of Home Affairs, the Department of Foreign Affairs and Trade, and the Department of Health. While there is currently a level of interaction between these agencies, there is still some disconnect between areas of government and their various agendas and international engagement programs.

Other important players are the state and territory government agencies that support international education within their jurisdictions. The lack of coordination between the Commonwealth and state and territory governments has been keenly felt as the sector attempts to develop plans for the safe return of international students to universities throughout 2020 and 2021. This process has involved a multitude of state and territory actors, federal agencies and at least three federal ministers.

Consideration should be given to how the Strategy will align and/or complement state and territory strategies and initiatives to support international students. The priority for the Commonwealth Government should be to move away from the current fragmented approach to international education in support of a cohesive all-of-Government effort in promoting and supporting Australia's education brand. This would enable development of a coordinated national image with a clear strategy to guide the sectors' efforts.

The new Strategy will also be an opportunity to reflect on the composition and role of the Council for International Education. Although the Council is comprised of several ministerial members, supported by expert members from the sector, there remains a lack of cohesion across the various areas of government that deal with aspects of international education. The Council has also maintained a relatively low profile throughout the COVID-19 pandemic, a time when the sector would have benefited from a consolidated and cooperative effort between government and the sector.

It would be useful to consider if a new body or agency should be established that would perform a coordination and consolidation role across the various areas of government. There are a number of models under which this could be constructed, for example, along the lines of the Office of the Chief Scientist, wherein an advisory body with appropriate expertise is embedded, yet retains significant autonomy from, the government.

⁹ <https://www.alantudge.com.au/latest-news/challenges-and-opportunities-in-international-education/>

The current strategy, the Australian Strategy for International Education 2025, was signed off by the then Minister for International Education and Tourism – a strong signal that at that time at least, the government of the day appreciated the value of the sector, and the importance of oversight at a ministerial level.

Enhanced cohesion across government would potentially also lead to more effective use of free trade agreements and other bi-lateral and multi-lateral agreements to facilitate trade policy that better supports export of services. Issues such as regulatory barriers and constraints set by other governments on qualifications and standards recognition could be pursued with more targeted efforts to achieve beneficial outcomes for the sector.

Change the narrative around international education

Prior to the pandemic, some negative commentary regarding the sector had been gaining traction in some quarters of the media and general public. The Strategy should include effective initiatives that work to highlight and promote the value of international students to Australia that move beyond the blunt economic contribution international education makes to the economy. More nuanced and sophisticated ways of promoting the value of the international education sector are needed to help the sector recover and regain momentum post-COVID-19.

This could be pursued via a broad communications campaign developed in consultation in the sector, noting that any such campaign would likely require significant funding.

Our role at home and in our region

A strong international education sector enhances the education experience for Australian students. Studying and living alongside students from a diverse range of countries broadens domestic students' experience and improves their cultural competencies. Students establish enduring connections that form the basis of global networks.

These personal networks extend and broaden, consolidating Australia's regional presence. International graduates return to their home countries with not only a high-quality education, but also an understanding of Australian life, and Australian democracy and governance. Educating successive generations of our regions' citizens, some of whom will go on to become influential leaders in both government and business in their own countries, strengthens our role as a leader within the region and builds ties that contribute to regional stability and benefit our own national security. Australia's efforts and contributions to date in educating students from our close neighbours have had extremely positive outcomes. The return of skilled and qualified graduates to these nations has benefited the region, consistent with the values Australia embodies and promotes throughout the region.

The Strategy could work to support this through a strong focus on our role within the Indo-Pacific region. This could take the form of a return to 'education-as-aid' through an expansion of the Australia Awards program, the New Colombo Plan or other targeted programs with dedicated funding.

Students at the centre

The Strategy should consider practical ways to support students and promote a positive environment for international students across all sectors. Given that this is an issue that affects all students, regardless of their study location across Australia, or their type or level of study, this is an ideal avenue for Commonwealth-supported initiatives to not only boost providers' capacity in this area. The Government could also consider providers, external to education institutions, that are also critical to student wellbeing. This would include a range of services integral to international students' physical and mental health, as well as other community services.

The Department of Health has indicated that they will be exploring potential 'reform' to the Overseas Student Health Cover (OSHC) Deed of Agreement, which sets out the minimum requirements for overseas

student health insurance policies. OSHC is an important consideration for international students and while the Deed of Agreement itself is perhaps peripheral to more critical aspects of student experience, any potential reforms to the deed should be considered within the context of the Strategy's goals.

Many international students suffered extreme financial and psychological hardship during COVID-19, which is likely ongoing for many students. Students received support from state and territory governments and universities did their best to support their students during the most intense periods of need. However, the lack of a coherent and nationally consistent package of support resulted in international students feeling abandoned and unwelcome in Australia. This breach of trust will take considerable effort to repair.

The student voice will be critical in repairing this relationship, as well as ensuring that both educational and student wellbeing offerings are meeting students' needs. Noting that the international student cohort is comprised of students from more than 140 different countries, there is a diversity of cultural backgrounds and experience that shape students' needs and the ways they interact with institutional, community and government services. Effective consultation with international students, including co-design of services that cater to the diversity of international students' needs, is paramount.

Outbound opportunities

Australia's international education sector should not concentrate solely on educating international students from other countries – international exposure is an increasingly important part of Australian students' learning experience. Within the university context, 19 per cent of undergraduate students undertake a student mobility opportunity¹⁰, and international contact is a common feature throughout postgraduate research experiences. Universities appreciate how highly students value these experiences and should be supported to enhance their capacity to provide for their students.

The loss of the Endeavour Program was felt across the sector. The program provided a valuable opportunity for students and early- and mid-career researchers to build their international networks and leadership capabilities. Reestablishment of the Endeavour Program or a similar initiative would provide significant benefits to Australia's domestic cohort and broaden the reach of Australia's education networks.

Similarly, it would be timely to conduct a review of the New Colombo Plan, with a view to considering the merits of expanding the program to include a broader range of countries. Consideration could also be given to providing targeted opportunities for specific cohorts of students, for example, a dedicated program for Indigenous students. This would require comprehensive consultation and planning, to ensure any such program is fit for purpose and meets the needs of the intended cohort.

Focus on research

A focus on higher degree by research (HDR) students and research collaboration could also be considered in the Strategy. This would be of benefit as research excellence is a critical part of a university's international reputation and contributes significantly to teaching capabilities. While growth in international student numbers within the higher education sector has grown by around 60 per cent over the past 10 years (2008 to 2019), only around 5 per cent of this growth came from the postgraduate research sector¹¹.

As postgraduate research students make a huge contribution to research efforts, it would be advantageous to focus on attracting high quality students to undertake research degrees in Australia. The international postgraduate research student cohort currently draws from a broad diversity of source countries. International research students are of extremely high calibre, and are an integral part of Australia's research ecosystem.

¹⁰ <https://thepienews.com/news/australia-quarter-undergrads-undertake-os-experience/>

¹¹ DESE International student data pivot table, <https://internationaleducation.gov.au/research/international-student-data/pages/default.aspx>

An obvious constraint upon enrolling greater numbers of HDR students is funding. At present, international HDR students can be supported through the Research Training Program (RTP), provided they do not comprise more than 10 per cent of a university's RTP allocations. Prior to 2017, international students were funded through a separate funding stream, the international student postgraduate scholarships (IPRS) program. The impacts of this change in funding mechanism for international HDR students potentially warrants further examination to determine the optimal way to support Australia's research sector. Consideration could also be given to allowing greater discretion in the allocation of RTP funding.

Policy settings

There are several current policy settings that could be examined within the context of the Strategy and potentially adjusted to support the Strategy's goals.

Maximising the contribution of international students to Australia's skilled migration and/or population agendas could be supported through more explicit linkage of international education with skilled migration pathways. This could include a reassessment of whether the inclusion of the genuine temporary entrant criterion within student visa eligibility criteria serves the desired policy outcome, or acts as an obstacle to the ultimate recruitment of skilled workers to support Australia's labour force.

The incentives currently in place to encourage international students to study and work in regional areas should also be examined to determine if they have been successful (although noting that they have only been recently introduced). This would include analysis of the impact of:

- Destination Australia on encouraging international students to choose regional providers; and
- the additional time allowed for graduates on 485 visas who have studied and worked in regional areas.

This is also an opportunity to assess whether current student visa settings meet students' needs. There is an increasing appetite among international students for work experience and internship opportunities. Acknowledging that this is an increasingly critical component of providing an education experience that results in career-literate, job-ready graduates, barriers to participation in such initiatives must be removed. This includes the inclusion of time spent participating an internship or work placement towards the 40 hours per fortnight of employment allowed to international students under their visa conditions. This requirement should be adjusted so that work-integrated learning experiences are not counted towards the 40 hour per fortnight limit.

PART 2: LIST OF RECOMMENDATIONS

The Strategy must contain a comprehensive plan that will support the sector through the immediate post-COVID-19 recovery, as well as over the longer term. Clearly defined goals and milestones, with measurable metrics or deliverables, should be set. Regular reviews and assessment against these metrics will ensure the Strategy is on track to meet its goals or if any adjustments are necessary.

Universities Australia suggests the following goals for the sector:

SHORT-TERM

Two-phase approach – recovery, then stability and growth

Recommendation 1. Support and facilitate plans for the return of international students.

Metric/outcome: Each state or territory successfully brings a set number of continuing students back to Australia.

Recommendation 2. Maintain current visa flexibility measures implemented in response to the pandemic until travel restrictions are fully lifted.

Metric/outcome: International students unable to return to Australia because of travel restrictions are not disadvantaged due to circumstances beyond their control.

Recommendation 3. Acknowledge the contribution international students make to our broader education systems and determine the mechanisms that will ensure this contribution is optimised.

- Work to bring international students numbers back to within pre-COVID-19 levels.

Metric/outcome: A consistent and sustainable level of international students in Australia.

MEDIUM- TO LONG-TERM

Diversification

Recommendation 4. Provide more consistent and integrated messaging and promotion regarding Australia’s education offerings and Australia as a study destination.

- Examine Austrade’s role in promoting and supporting Australia’s international education sector, including a comparison with the British Council and/or Campus France.
- Consider if the previous model under which Australia Education International operated would provide enhanced and more comprehensive support to the sector.

Metric/outcome: Improved and more consistent messaging and understanding of the Australian international education sector in overseas markets.

Offshore/online delivery and transnational education (TNE)

Recommendation 5. Conduct a rigorous and comprehensive research and analysis project examining online delivery and TNE opportunities. This would include:

- comprehensive risk evaluation and assessment of TNE ventures;
- determination of the current and potential demand for online and TNE offerings;
- return on investment and profitability analysis; and
- assessment of participation rates and accessibility of TNE offerings.

Metric/outcome: Improved market understandings and increased capacity to evaluate and meet demand for various educational offerings.

Cohesion across government

Recommendation 6. Improve cohesion across the various areas of government that interact with and support the international education sector

- Examine the structure and role of the Council for International Education and consider if the current model provides the optimal level of support to the sector.
- Consider the establishment of a new dedicated body/agency to work across the various areas of government and provide an integrative approach to support the international education sector. This group could be comprised of senior (Deputy Secretary) government officials from all relevant government departments:
 - » The Department of Education, Skills and Employment;
 - » The Department of Foreign Affairs and Trade;
 - » The Department of Home Affairs; and
 - » The Department of Health.

Metric/outcome: Streamlined and improved interaction between the Commonwealth Government, state and territory governments and the sector.

Change the narrative around international education

Recommendation 7. Develop and adequately fund a comprehensive communications campaign in conjunction with the sector to promote the diversity of the international education sector and the value it brings to Australian communities.

Metric/outcome: Improved public awareness of the international education sector and increased public support.

Our role at home and in our region

Recommendation 8. Revisiting the origins of international education in Australia, augment and further develop programs to support students from our neighbours in the Indo-Pacific region.

- Consider expansion of the Australia Awards.
- Consider expansion of the New Colombo Plan.
- Develop a new and targeted scholarship program for students from the Indo-Pacific region, perhaps geared towards specific disciplines.

Metric/outcome: Improved relations with neighbouring countries in the region, bolstering regional stability and security.

Students at the centre

Recommendation 9. Enhanced support for positive international student experience

- Explore the barriers and challenges to students seeking support services and where gaps between services provided by institutions and community services exist.
- Improve institutions' capacity to provide effective student support programs.
- Provide increased support to community services that provide support for international students.

Metric/outcome: Improved student experience and rebuilding of Australia's reputation as a positive and welcoming country for international students.

Increased positive responses to international student experience surveys.

Measures of engagement with institutional programs.

Recommendation 10. Ensure programs and support services for international students are fit for purpose and developed in consultation with both providers and international students.

Metric/outcome: Improved consideration of students' perspectives and needs in program design.

Outbound opportunities

Recommendation 11. Expand the outward bound student mobility offerings across the sector.

- Expand New Colombo Plan to include a broader range of countries and focus on provision of opportunities for disadvantaged groups.
- Consider developing programs to promote and support mobility throughout the postgraduate research sector.

Metric/outcome: Improved access to and participation in outward student mobility for Australian students.

Increased globalisation across the undergraduate, postgraduate and research sectors.

Focus on research

Recommendation 12. Increase the contribution of international HDR students to Australia's research ecosystem.

- Identify areas within the HDR landscape for targeted funding/scholarship programs to encourage international research students to come to Australia.
- Analyse the transition from IPRS to inclusion of international HDR students within the RTS and if this change has been beneficial or detrimental or indifferent to international HDR student enrolments.

Metric/outcome: Increased numbers of international HDR students, particularly in areas of critical research.

Policy settings

Recommendation 13. Examine Australia’s current post-study work rights and establish a more explicit link between international education and skilled migration.

- Extend the time allowed on a 485 visa.
- Consider allowing additional time on a 485 visa according to discipline, targeting areas of skills shortages and labour force needs.
- Conduct an awareness campaign to improve employers’ understanding of the 485 visa conditions to encourage greater employment of international graduates.

Metric/outcome: Increased proportion of international students graduating from Australian institutions taking up options for skilled migration on skilled visa types.

Recommendation 14. Adjust student visa settings to better accommodate and facilitate student internship and work-integrated-learning opportunities for international students.

- Ensure that participation in work-integrated learning experiences does not count towards the 40 hour per fortnight limit for time spent in employment for international students.

Metric/outcome: Improved employment prospects for international students.

Increased satisfaction with education experience among international students.

PART 3: RESPONSE TO DESE CONSULTATION PAPER QUESTIONS

1. What are the key priorities for a new Australian Strategy for international education?

- It is crucial to distinguish the need for both short- and long-term priorities in the Strategy. The Strategy should acknowledge the need for a recovery phase, to allow the sector to recuperate from the repercussions of the pandemic, particularly universities in regional areas or universities which have suffered significant deficits. This must be complemented by goals to support a stabilisation and growth phase.
- There is a need for improved coordination across government and stakeholders in the sector. The sector interacts with numerous government actors, in both the Commonwealth and state and territory governments, without a clear and established centre of coordination. This could be led by a dedicated body or agency established to coordinate and consolidate efforts across government to support international education.
- Any proposal to expand offshore/online delivery, including transnational education, should be approached in a measured manner. These delivery models should be an additional offering and not a replacement for the in-country study experience. While institutions have made rapid pivots to online delivery, this was done out of necessity due to the global pandemic. Preliminary surveys and student feedback have indicated that it is not the preferred mode of delivery.
- Continued flexibility and understanding from the Department of Home Affairs surrounding student visas settings will significantly assist in the retention of international students at Australian institutions, and the future growth of the sector. In consideration of recent changes that Australia's competitor countries have made to their immigration settings, the Strategy must consider exploring and establishing a more explicit link between international students and skilled migration. A failure to respond with equally competitive incentives may lead to significant impacts on Australia's international student numbers and knowledge workforce.

2. Students should be at the centre of the new Strategy. How can Australian education providers deliver the best possible student experience both now and in the future?

- To ensure that students remain at the centre of Australia's education sector, it could be helpful to hold consultations with student from key representative groups such as CISA to see what would best serve the interests of the student cohort.
- Universities are currently doing their utmost to support their students who remain offshore but it is by no means a straightforward task to provide holistic educational and student wellbeing services remotely. It is critical to acknowledge these challenges, accepting the reality that it is unlikely to offer the level of support international students receive in Australia to offshore students.

3. What changes are needed to make Australia more globally competitive over the next decade?

- i. Policy and regulatory flexibility are important in enabling providers to innovate. How can we utilise these settings to pursue opportunities, and in what other ways can we work together to ensure Australia remains globally competitive?
 - Maintaining robust yet competitive visa settings comparable to our 'competitor' countries is an important component in maintaining Australia's reputation as a destination of choice for both international students and skilled migrants. The post-study work visa is also often the entry to the academic workforce, in which Australia competes on a global scale for these highly skilled graduates. Failing to acknowledge or explore the possibility of enhancing the link between international education and migration could well disadvantage Australia in the long-term.

4. How can providers, governments and stakeholders work together to achieve diversification opportunities (for example of disciplines, source countries, study destinations and delivery models)?

- The Strategy needs to be clear on whether diversification means a redistribution of student numbers in regard to source country, a deliberate shift away from traditional source countries, or a strong push to increase student numbers from non-traditional source countries, meaning an increase in total student numbers. While superficially similar, each of these definitions would have distinct ramifications for the development of the Strategy.
- It could be useful to examine the role and structure of the Council for International Education to ascertain if this model is offering optimal support for the sector. This could include consideration of the establishment of a new cross-departmental agency/body, comprised of senior departmental officials, that could provide integrative support to the sector.
- It is also important to acknowledge that international education operates within a market context and is driven primarily by student demand, which can be difficult to influence and shape.

5. What are the necessary skills for the future that students should be prepared for?

- i. How can Australia improve employability outcomes for international students, ensuring they have the necessary skills to compete in a globally competitive labour market?
 - Continuing to provide a high-quality education experience.
 - Increase access to work experience opportunities for international students.
 - Although online delivery and work is becoming increasingly more common, there should not be an overemphasis on digital skills and delivery. International students have demonstrated that there is still a significant desire for an in-country learning experience. It is through this in-country experience that international students gain critical 'soft skills', such as learning to adapt to a new society, and language, often within the context of being away from the family home for the first time.

6. How do we create a uniquely Australian education experience?

- i. What is our value proposition for both international and domestic students?
 - An Australian educational experience offers the prospect of gaining a high-quality, globally recognised qualification, coupled with the opportunity to live and learn in Australia.
- ii. How do we offer an Australian education experience while complementing the value of Australian offshore and online education?
 - It is broadly acknowledged that the in-country study experience is equally as important as the Australian qualification for international students. Therefore, the Australian value proposition hinges considerably on students being able to travel to Australia safely. Until this can be achieved, Australia can remain open and flexible with visa extensions in order to avoid losing students due to their choosing to continue their studies in other competitor countries.
 - Offshore/online education should be an additional offering to in-country study opportunities. This choice will give students the freedom to choose their desired Australian education experience whilst still having access to a high-quality education experience offered by globally competitive Australian providers.

7. Community support for the international education sector is important for the sector's social licence. How can the benefits this sector provides to Australia be better understood by wider community?

- There have been some negative aspects of domestic sentiment and media commentary regarding international students both prior to and during the pandemic. This sentiment could be shifted through a comprehensive communications campaign to demonstrate to the Australian

public the broad benefits that international students offer to Australian society. This campaign could also be used to debunk some common myths about international students, e.g. international students using education as a pathway to residency or international students taking Australians' jobs.

8. What else should the Council for International Education and the Australian Government consider in developing the new Strategy?

- There needs to be clarity regarding ownership of the Strategy, with a clear delineation between the roles and priorities of government and the various sub-sectors.
- The Strategy should contain clear objectives/goals, coupled with accountability measures to enable effective review and evaluation of progress.