![IEAA - International Education Association of Australia]

IEAA Submission
Response to Australian Strategy for International Education (together with an additional feedback attachment)

May 2021

1. **What do you see as the key priorities for a new Australian strategy for international education?**

The first two priorities address the specific needs of the recovery phase (2021–2023), while the final three cover the full life of the strategy (2021–2030):

A. ROADMAP FOR A RETURN TO TRAVEL

While recognising that the public health response must remain paramount, we call for a clear plan and schedule for the return of international students to Australia.[1] We recommend a robust COVID-safe system with a clear timetable be established to manage the return of students in a safe and responsible manner.[2]

B. ACKNOWLEDGE AND SUPPORT STUDENTS AFFECTED BY THE PANDEMIC

International students experienced significant disruption to their studies whether they were onshore or offshore, including financial losses as the global economic situation impacted the flow of funds from family or part-time jobs. Social isolation, incidents of racism and anxiety over family and friends added to stress levels, as demonstrated in the Social License Report.[3] These students and graduates face significant financial and career challenges as many work experience opportunities remain closed to them.

We acknowledge the increased policy flexibility shown regarding eligibility for Post Study Work Rights (PSWR) to date and advocate for the application of the general principle that students affected by the pandemic in 2020 and for the duration of the recovery period, should be able to access PSWR whether or not they are able to travel to Australia.

C. EMBRACE THE GLOBAL CLASSROOM

As the differences between onshore, offshore, in person, online and transnational education become blurred, we must embrace the concept of studying 'with' rather than 'in' Australia. Blended delivery models, online learning, virtual student mobility and online recruitment will continue to play a significant role in future, in combination with in-person delivery modes. This presents an opportunity for Australia to actively embrace these changes, leverage digital technologies and lead the way in designing new operating admissions and teaching models fit for the 21st century.

---

[1] IDP Connect Crossroads IV, International student choices and motivations increasingly driven by the availability of face-to-face teaching, and of prospective international students willing to pay in part or in full for quarantine. 28 April 2021.

[2] This could be a staged approach which might include travel corridors, testing, vaccination and quarantine. Giving students greater certainty about when they might be able to travel to Australia and allowing providers to plan for their return would have many personal and sectoral benefits. It would also offer partial protection from the loss of students to major competitors such as the UK which is offering international students Vaccine Priority and eligibility for a 2-year post study work visa https://www.studyin-uk.in/studying-in-the-uk-coronavirus/

[3] Lawrence, R. IEAA and ENZ Social License Report: Domestic and International Students across Australia and New Zealand. February 2021.

To succeed, this approach will require investment in upskilling academics and staff and in updating the policy and regulatory environment to create a seamless and flexible framework that facilitates easy transfer and recognition between different study modes and locations.

D. INVEST IN GRADUATE CAREER SUCCESS

See Q5.

E. SUPPORT FURTHER EXPANSION OF LEARNING ABROAD

See Q6.1.

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?**

The Social License Report cited above highlighted that many international students in Australia experienced significant challenges over the past year and are potentially a source of negative advocacy. Addressing these issues is clearly a matter of utmost importance for student wellbeing and for Australia's global reputation.

One of these key concerns relates to the provision of mental health services. A considerable amount of research has been conducted lately to identify and document good practice in this area. Recommended actions are set out clearly in a number of reports, including the Orygen University Mental Health Framework [4] and the Productivity Commission Inquiry Report [5]. Our position is that fully implementing the steps set out in these reports is essential to delivering the best possible student experience.

Another key consideration is how to ensure that the views of international students are heard in a systematic and consistent way at all levels of policy making, from institutional to local, state and national fora. To this end, we recommend that the Strategy incorporate a shift in the status and funding of the Council of International Students Australia (CISA) to move it to a financially sustainable long-term operating model. This would support the expansion of its membership to cover all parts of the sector so that any international student in Australia could be a member of CISA.

Lastly, we propose a collaboration with IEAA to expand the *Broaden our Horizons* program, our community campaign to highlight the benefits of international students to our industry connections.

---

[4] Orygen. Australian University Mental Health Framework report. Melbourne: Orygen 2020.

[5] Productivity Commission 2020, *Mental Health*, Report no. 95, Canberra.

ieaa.org.au

This could form part of a larger campaign to communicate the importance of Australia's international education sector to the broader community. [6]

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

In addition to delivering on its core promise of a high-quality study experience, Australia can create a compelling global position by introducing a world-leading, ***career success package***, which includes:

- A commitment to offer every international student a Work Integrated Learning (WIL) experience (either in person or virtual). To facilitate this, WIL should not count towards the 40 hours per fortnight onshore limit. [7]
- Free workplace communications training for students. [8]
- A program of career networking events facilitated by government, industry and education providers. In line with the global classroom approach, this should aim to develop connections and competencies which support students' ability to enter the workforce anywhere in the world. [9]
- A campaign for all Australian qualifications to be recognised and accredited globally, whether undertaken in person or online.
- A focus on providing transparency of information on purpose-built student accommodation (PBSA). [10]

Secondly, our visa, ***PSWR and work rights settings*** must be globally competitive to support this employability focus. They should also facilitate ease of transfer between different modes and locations.

---

[6] https://broadenourhorizons.com.au/insights/ This campaign should demonstrate the long-term contribution international students make to the community, and stress how important it is to ensure that they experience a safe and welcoming environment. It should be supported by consistent, welcoming messaging from across all government departments that include strong public statements in support of international education and anti-racist policy making.

[7] In contrast, New Zealand does not count time spent on work experience toward the 20-hour per week threshold. https://www.govt.nz/browse/immigration-and-visas/get-a-new-zealand-student-visa/working-while-on-a-student-visa

[8] This could potentially be developed by ELICOS providers in partnership with industry

[9] Useful models to consider include the Australia Awards professional linkages workshop - https://www.dfat.gov.au/sites/default/files/australia-awards-linkages-good-practice-guide.pdf and the City of Sydney and City of Melbourne WIL Ambassador programs.

[10] See separate PBSA industry submission.

ieaa.org.au

As part of this holistic approach, we advocate the following:

- The introduction of a graduate route to permanent residency or additional PSWR in areas of skills shortage. This could be a robust two-stage process that rewards industry-specific experience, for example by providing an additional automatic one-year extension if the applicant has a graduate job.
- Offshore online study should continue to count towards PSWR for all students who are unable to enter Australia due to the pandemic so they are not penalised for circumstances outside their control.
- Consideration should be given to recognising offshore study in Australian Transnational Education (TNE) programs as eligible for PSWR or to providing some other form of recognition, for example, through credits towards migration applications.[11] We also welcome the reframing of the 'Study in Australia' proposition as 'Study with Australia' and the Strategy's aspiration that international students should receive a world-class experience studying with Australia regardless of their location or mode of study.

Supporting this more blended approach to learning aligns closely with growing student concern around environmental issues, as demonstrated by a recent survey where 66 per cent of prospective international students said that the commitment to the sustainability of the country that the university is located in was an important consideration in their choice of study destination. [12]

In addition, we recommend further investment in our future-focused teaching capacity, working in partnership with IEAA and education providers to provide training for academics in how to deliver a world-leading online and blended education experience, including how to facilitate a diverse classroom.

3.1 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?

A paradigm shift has occurred since the pandemic and the old distinctions between studying onshore, offshore, online, in person or blended are increasingly redundant. Australia is well placed to thrive in this new, dynamic environment thanks to its established network of transnational operations and offshore campuses, its early adoption of learning technology and its commitment to employability and innovation.

To support the sector in this dynamic environment, however, the policy and regulatory settings need to be updated to incorporate:

---

[11] There are at least 150,000 students studying Australian award programs in HE and VET either in TNE-partnered delivery or in Australian branch campuses (data from 2019).

[12] Times Higher Education, Student Pulse Report. April 2021.

ieaa.org.au

- A review of the ESOS Act and National Code to ensure they support emerging study patterns, for example, by extending consumer protection to students studying online and offshore.[13] As mentioned in our response to Q2, there is a need to place greater focus on the provision of mental health services, and this requires a strengthened regulatory framework which removes the current restrictions on delivering support and mental health services to students offshore and supports the transition to the global classroom. It also requires a review of the OSHC Deed to ensure the requirements on approved suppliers deliver adequate cover.
- TEQSA to consider maintaining some of the shorter term COVID-related flexibility it has introduced over the longer term and to conduct a review of its governance requirements for TNE delivery to ensure appropriate flexibility and alignment to the proposed strategic intent.
- A review of the system of onshore visa transfers to ensure high-quality VET providers are not disadvantaged.
- Increased investment to boost ASQA's capacity to monitor and apply the current regulatory requirements to reduce the incidence of poaching and ensure all providers deliver to the required standard.

Wage theft and workplace exploitation remain a major issue with one report finding that 49 per cent of surveyed international students were paid below the basic statutory minimum wage and 77 per cent were paid below the minimum casual hourly wage. The Migrant Workers' Taskforce report[14] puts forward several recommendations to address this problem; the actions of most relevance to this Strategy include:

- The need for specific reference to be made in the National Code of Practice for Providers of Education and Training to Overseas Students that education providers should assist international students experiencing workplace exploitation.
- The recommendation that a firewall be established between the Fair Work Ombudsman (FWO) and the Department of Home Affairs (DHA) to ensure that complaints of workplace exploitation can be investigated without impacting students' visas, and
- The need for providers' reporting requirements to be amended to ensure they are not obliged to report students who have exceeded the 40-hour per fortnight threshold due to possible workplace exploitation.

Foreign arrangements: in our view, there would be value in the Government providing support for institutions to have robust agreements that do not negatively impact Australia's foreign policy objectives.

---

[13] This could address existing gaps and anomalies, such as those relating to guardianship and WIL requirements.

[14] Report of the Migrant Workers' Taskforce, Commonwealth of Australia, 2019.

ieaa.org.au

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

Achieving a greater balance of international students from a wider variety of countries who enter into a broader range of disciplines will enhance the learning experience for all students and reduce the financial risk of those institutions, which currently depend on a narrow range of source countries or regions.

While acknowledging that the scale of demand from China and India makes this a significant challenge, we have identified several possible actions to support this aspiration:

- Achieving diversification of study destinations within Australia by maintaining the PSWR bonuses and scholarships to study in regional centres. [15]
- Increasing the number of applicants to the school sector by promoting schools under one umbrella brand.
- Through judicious use of scholarships, specifically by:
    - introducing inbound scholarships in disciplines that are under-represented and relate to skills shortages. This could potentially re-establish the concept of excellence to attract STEM students and top talent. [16]
    - expanding the range of countries covered by the Australia Awards.
    - introducing new scholarships for emerging markets, e.g. Africa and LATAM.
- Investing further in Austrade's virtual student recruitment capacity which has the potential to target students in non-traditional locations and new and emerging markets, including inbound non-award exchange and study abroad students which represent an important diversity component for many universities.
- Supporting the promotion of Australia's reputation and brand in the field of online learning, transnational education and pathways programs.
- Encouraging providers to capitalise on the emerging opportunities around sustainability, for example by investing in the development of new global programs around climate change and renewable energy. [17]

---

[15] Pre-COVID, about 80% of onshore international students studied in Sydney, Melbourne and Brisbane. Place-based incentives are needed to encourage more international students to study elsewhere in Australia. Education, migration and regional development policy are fundamentally linked. Growth in international student numbers in non-metropolitan Australia would benefit the nation as a whole by working to ease congestion and drive down the cost of housing in our capitals and facilitate international links outside major cities. Boosting international student numbers at regional universities will grow regional economies. There are professional skills needs in the regions and a requirement to diversify the sector. International education is a significant way to address these issues.

[16] The example provided by the Equity and Merit Scholarship Scheme that was in place in the late 1980s and early 1990s offers a valuable example of how to open up the international education sector to a diverse range of students from a diverse range of backgrounds. By differentiating on the basis of equity and merit, with associated differences in scholarship benefits, the Australian government was able to offer scholarships to students from a large variety of nations and broaden the market from which Australian higher education institutions were drawing from.

[17] The growing demand for programs in this field is backed up by data from the Times Higher Education Student Pulse Report. 67% of surveyed international students said that the availability of degree programmes in specific sustainability-related disciplines was an important factor in their choice of study destination. April 2021.

To achieve greater diversification of our sector, we believe a more holistic, joined-up approach is required which coordinates the government and sectoral response at all stages of the student journey from application through to graduation and encompassing Australia's global alumni. Consideration should be given to appointing a high-level *International Education Commissioner* who can encourage diversification and serve as an advocate for the sector, advised by the expert members of the Council for International Education.

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

Improving graduate employability outcomes is a key priority and we recommend following the list of vital skills for future career readiness designed by the National Association of Colleges and Employers (NACE), which include the following: [18]

- **Career and self-development:** proactively develop oneself and one's career through continual personal and professional learning, awareness of one's strengths and weaknesses, navigation of career opportunities, and networking to build relationships within and without one's organisation.
- **Leadership:** recognise and capitalise on personal and team strengths to achieve organisational goals. Entrepreunerial training and mentorship should be available to appropriate students who show a particular interest in this area.
- **Communication:** clearly and effectively exchange information, ideas, facts, and perspectives with persons inside and outside of an organization.
- **Professionalism:** knowing work environments differ greatly, understand and demonstrate effective work habits, and act in the interest of the larger community and workplace.
- **Critical thinking:** identify and respond to needs based upon an understanding of situational context and logical analysis of relevant information.
- **Teamwork:** build and maintain collaborative relationships to work effectively toward common goals, while appreciating diverse viewpoints and shared responsibilities.
- **Equity & inclusion:** demonstrate the awareness, attitude, knowledge, respect and skills required to equitably engage and include people from different local and global cultures. Engage in anti-racist practices that actively challenge the systems, structures, and policies of racism.
- **Technology:** understand and leverage technologies ethically to enhance efficiencies, complete tasks, and accomplish goals.
- **Global citizen:** being able to work in a culturally diverse environment

---

[18] https://www.naceweb.org/career-readiness/competencies/career-readiness-defined/

In addition to the above list, the experience of the pandemic has clearly demonstrated that graduates must have strong digital skills to complement these core career readiness competencies.

A final important skill set that is emerging is that of sustainability. Many institutions around the world are increasingly embedding the Sustainable Development Goals across their curriculum in the knowledge that students with the knowledge a perspective to address global challenges will be sought after by employers and in the greatest demand for our future world. [19]

5.1 How can Australia improve employability outcomes for international students, ensuring students have the necessary the skills to compete in a globally competitive labour market?

A whole-of-sector approach is needed to deliver on this aspiration, including institutions investing in curriculum design, a sector-wide commitment to make WIL available to all and the introduction of a holistic *career success package* (as outlined in our response to Question 3).

We also recommend the following key actions:

- Utilise the government's reach and industry connections to educate employers about the benefits of employing international students and graduates and to dispel some of the myths.
- Continue to support a paid internship program in areas of skill shortages and regional areas.
- Work with the sector to develop a set of employability skills modules based on the skillset outlined in Q.5, and to run career-focused seminars and networking events for students (on and offshore).
- Create a GOS-I to track and report on international graduate outcomes over the long term.
- Develop a fund to support academics to utilise Collaborative Online International Learning (COIL) techniques (also known as 'internationalisation at home') to inject diverse international perspectives and teamwork into students' study experience.
- Education providers could also be encouraged to work more collaboratively with industry to determine the specific skills required to grow the key priority sectors, to refine coursework to ensure students are developing the identified skills required and to create employment pathways for students that complete the coursework.
- Provide opportunities for students and alumni to take part in volunteering programs.

---

[19] Times Higher Education Student Pulse Report. 69 per cent of surveyed international students believe it is important for their future career prospects that they can demonstrate to employers that they have developed into a sustainable citizen. April 2021.

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

The Australian education system is underpinned by a core egalitarian value – that quality education can be accessed by all. Class, culture and socio-economic background are not a prerequisite to further education within the Australian context; we instead value aspiration, effort and progression through a scaffolded system that provides a place for everyone. [20]

Rather than working to 'create' a uniquely Australian education experience, we can ensure that our educational institutions are of high quality, teach excellent courses, provide well-designed support services and take a whole-of-community approach to education. Focusing on these foundational aspects will allow the 'quality' to be the unique selling point of Australian international education.

That said, there are some specific ways in which we can complement that core offer and make an Australian education at any level a compelling proposition globally, most notably by:

- Implementing the *career success package* outlined above.
- Ensuring that visa and work right settings are dynamic and remain globally competitive.
- Reframing our conception of 'an Australian education' to encompass online, in person and blended modes of learning, at both onshore and offshore study locations. The education leaders of the future will be those who pull off this challenging task and who are able to offer study packages in fluid combinations which are responsive to learners' needs and contexts.

It is also recommended that we develop online modules which provide an overview of Indigenous cultures and history to enable all international students to gain an understanding of the first nations people of Australia.

A distinctly Australian education experience could be defined by the three strategy themes:

- Connected – students are connected/engaged with their education provider, fellow students (domestic and international) and the Australian community.
- Creative – educational and support initiatives that cater for the need of every students' aspirations. We need to unpack the international student experience and identify the different components and acknowledge that an international student experience is unique to the student. How do we cater to this? What elements of this unpacked experience can be delivered offshore?
- Caring – how do we let students know that we genuinely care for them as an individual? Providing support and services that address their specific needs.

---

[20] Commenmts made by Rachel Simmons, COO, UP Education at IEAA Members webinar.

ieaa.org.au

6.1 What is our value proposition for both international and domestic students?

The value proposition for students is simple: an internationalised study experience offers significant benefits and this holds as true for Australian students as it does for their international counterparts. Learning abroad (LA) brings many advantages to individual students, institutions and Australia as a whole and should form a core component of this strategy. It is often the 'lost part' of the international education story.

Employers in multi-cultural Australia expect employees to be culturally competent and having international students in the classroom means domestic students can learn alongside students from all over the world, often making lifelong friendships and sparking their own interest in studying abroad. Around 100,000 students in Australia are missing out on the opportunity to participate in LA programs due to the travel restrictions this year and last. This is a significant loss as 84 per cent of students rate LA as important or very important to their education experience.[21]

There is good evidence to support this view; in one study, 85 per cent of graduates indicated that learning abroad had a positive impact on developing skills to support their professional role.[22]

As part of a bold vision for international education in Australia, we call for an ambitious goal to be set where all domestic students have access[23] to a global education via education abroad at some stage in their education journey, noting this could be achieved virtually or in-person and through a variety of different programs, including COIL, internships, short programs, study abroad or exchange. This would represent a significant increase in the current participation level (23 per cent of domestic undergraduate students studied abroad in 2019).

To support this aspiration, some policy changes would be needed:

- The New Colombo Plan (NCP) should be expanded beyond its current range to include schools, independent institutions, a greater range of VET programs and postgraduate university degrees as well as a broader range of countries.

---

[21] StudyMove Report: Measuring the Impact of COVID-19 in Learning Abroad. November 2020.

[22] Potts, D. (2020), 'Career outcomes of learning abroad: national report', International Education Association of Australia (IEAA). Retrieved from www.ieaa.org.au.

[23] Though many institutions have strategies for inclusion in LA in place, the percentage of students from equity categories as a proportion of the total number of learning abroad experiences from our institutions remains relatively low. A Government-led initiative to provide access and support to all students, including students in all equity categories (low SES, English as a second language, students with a disability, first in family, Indigenous students) is needed. This could be done through tailored messaging about the benefits – personal and professional – of participating in a learning abroad program and also through tailored NCP funding specific to these categories.

ieaa.org.au

- Consideration should be given to offering a retrospective opportunity to engage in learning abroad to the 100,000 students who missed out due to the pandemic.
- Additional support should be provided at all levels to incentivise foreign language learning.
- Internationalisation of the curriculum: a fund could be established to build capacity to deliver high-quality virtual internship, COIL and other online forms of learning abroad.
- A data hub on outbound international mobility should be created to capture the extent of Australia's engagement in the bilateral side of international education.

6.2 How do we offer an Australian education experience while complementing the value of Australian offshore and online education?

One possible solution would be to introduce a network of high-connectivity Australian Study hubs in key overseas markets to facilitate engagement with providers in Australia. This could have the benefit of ensuring a high-quality connection can be maintained even in locations where internet connection strength, reliability or access are an issue. When public health considerations allow, they could also be used as delivery sites for lectures, seminars and networking events for students or prospective students interested in studying with Australia.

These hubs would not need a specially designated physical presence but could be a space within an agent's office or a partner or feeder institution, as long as they have high-quality audio and video.

7. What else should the Council for International Education and the Australian Government consider in developing a new strategy?

While we are naturally keen to support the sector to recover its global position, we would like to take the opportunity of this pause to reset our aspirations for the long-term size and make-up of the sector, recognising that constant growth would not be sustainable in the long term. Our preferred approach is therefore to prioritise value over volume. Under this approach, we seek to internationalise the curriculum and deliver a world-class study experience for all students, to improve satisfaction levels and graduate outcomes for international students, and to innovate and improve our global classroom, whether in Australia, offshore, online or in some combination.

One tangible way of encouraging greater high-value engagement with the Australian education system could be to introduce incentives for students to study with Australia at multiple levels, e.g. continuing on from the school sector through to postgraduate level.

A key part of supporting this is the understanding that in the long-term, our standing and global competitiveness depends on forging sustainable, bilateral relationships that value

the needs and aspirations of other countries, that are responsive to emerging technologies and changing study patterns, and that support the long-term career goals of students at all levels. To support this aspiration, we would advocate for the network of Australia's

Education Counsellors to be expanded to allow them to focus more keenly on bilateral education relationships and industry connections rather than on trade more broadly.

We would also support the creation of a single data hub to collect and disseminate all international education-related data and capture the full extent of the richness of our sector.

8. **Do you have any additional comments or feedback to share?**

Given the considerable financial distress faced by international students onshore at the onset of the pandemic, we would urge consideration be given to establishing a support fund to provide coordinated pastoral support and financial assistance to students in future should the need arise.

======================