



3 May 2021

Dear Expert Members of the Council for International Education

Subject: Response to the Consultation Paper on the new Australian Strategy for International Education

The Australian Collaborative Education Network (ACEN), professional association for Work-Integrated Learning (WIL) in Australia, agrees that enhancing international students' employability outcomes is critical. Not only will this empower individual students to achieve their career goals, their enhanced employability outcomes will attract prospective students and help to make Australia a study destination of choice.

It is noted that the recent NPILF model, intended to increase industry engagement in university curriculum to enhance employability, targets domestic students only. We feel it is important, therefore, that the new Strategy similarly addresses higher education's capacity and resourcing for enhancing employability among international students.

It is now widely understood that WIL is a key platform for enhancing the employability of domestic and international students. WIL, as noted by Universities Australia (2019), comes in many forms. Significant progress has been made in diversifying WIL to increase scale and ensure that as many students as possible, including international students, are able to experience and benefit from WIL.

WIL's important role in developing student employability has been recognised in government-funded projects, such as the WIL to Work project, supported by the Department of Education, Skills and Employment's Enabling Growth and Innovation project fund. The developed online modules have helped many international students nationwide to develop the skills needed to thrive during their WIL experience.

We note that WIL featured in the National Strategy for International Education 2025 (Australian Government, 2016), particularly under strengthening of the student experience and engaging students with industry. We are concerned that WIL is not mentioned in the Consultation Paper for the Australian Strategy for 2021-2030, given its critical role in developing future-capable graduates.

We feel that supporting the delivery of quality WIL among international students, as well as increasing their participation in WIL, continue to be a key priority for the new Strategy. Australia has worked hard to improve international students access to WIL, their participation now almost comparable to domestic students (Universities Australia, 2019).

International students' appetite for WIL is well known. We would also like to highlight recent evidence of the value that outbound WIL (e.g. international internships) brings to our domestic graduates. Graduate Outcomes Survey data from 80,000 graduates indicates that a global WIL experience increases the chance of employment among new graduates (ACEN, 2020).

We would also like to emphasise the current threat to international students' participation in WIL, one that we urge the Expert Members of the Council for International Education to address if Australia is to remain globally competitive over the next decade.

The Department of Home Affairs' apparent change in interpretation of WIL and the 40-hour fortnight work limitation for Student visa holders is likely to have a significant impact on Australia's ability to remain globally competitive in the international education market.

As the Expert Members of the Council for International Education will be aware, most Student visa holders are only permitted to work a maximum of 40 hours per fortnight when their course is in session and unlimited hours when their course is out of session. Schedule 8 of the Migration Act Regulations 1994 specifies that work won't count towards the 40-hour limitation if the work was specified as a requirement of the course when the course particulars were entered in the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS). The Department of Home Affairs released an update in mid-2018 which outlined that only mandatory work placements were excluded from the 40-hour limit.

This ruling means that international student visa holders who undertake units with work placement hours that have not been registered as mandatory on CRICOS i.e. the hours are components of elective units, will have these hours counted towards their 40 hour per fortnight work limitation whilst their course is in session.

This issue could have a significant impact on international student take-up of elective work placements across all universities. It will particularly impact on disciplines where placements are traditionally elective, e.g. Science, Business, Law, IT, Arts and Humanities. Work experience as part of the course is a critical factor in international students' choice of study location. Any limitation on international students' ability to undertake work experience as part of their studies is likely to significantly impact Australia's ability to compete in the global international education market.

It is critical that the Australian Government reconsiders this visa condition and allows elective work placements to be excluded from the 40-hour work limit.

If appropriate, we would be keen to provide additional detail on any of these points, or WIL more generally, to the Expert Members of the Council for International Education.

Best regards



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References

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