



## Submission: Australian Strategy for International Education 2021-2030 Consultation Paper

The Independent Education Union of Australia (IEU) welcomes the opportunity to provide feedback regarding the Australian Government's *Australian Strategy for International Education 2021-2030 Consultation Paper*.

### 1. About IEU

IEU represents 75,000 teachers, support staff and ancillary staff in non-government education institutions across Australia and consistently engages in industrial and education debate at both national and state levels through its Education and Industrial Committees.

With respect to the VET and ELICOS sectors, our membership includes teachers, trainers, assessors and ancillary staff in non-government education institutions and our advocacy for the sector is informed by a member-based committees and working parties convened at the state and territory levels.

### 2. Context of Response

To clarify the context within which we provide our feedback on the Consultation Paper, it is necessary to acknowledge that there are four primary markets for international students in Australia:

1. **Schooling:** The enrolment of younger students from other countries in Australian schools, with the purpose of obtaining school-level qualifications (e.g. Senior Certificates).
2. **English Language Intensive Courses for Overseas Students (ELICOS):** Which are primarily provided by stand-alone ELICOS colleges, which may or may not be affiliated with providers of further education (vocational or university education).
3. **Vocational Education and Training (VET):** Education and training focussed on providing skills for work, which may be delivered to students still enrolled in secondary schooling, or to adult students seeking to acquire new, or upgrade existing, work-related skills. VET may be delivered by state-owned Technical and Further Education (TAFE) colleges, or by private VET providers.

4. University Education: Education and training provided by a recognised university which may, but need not necessarily, focus on work-related skills and competencies.

Our members work in the school, VET and ELICOS sectors and our comments do not, therefore, refer specifically to international education as it is enacted in the university sector, although they may have some relevance in this context.

### 3. Response to Discussion Questions

#### 2.1 What are the key priorities for a new Australian Strategy for international education?

Evidence from our membership, independent investigations by various media outlets and the government's own data on student enrolments [1] indicates that these sectors have been heavily impacted by a reduction in numbers of international students (the sole market for the ELICOS sector) as a consequence of the COVID-19 pandemic and a significant proportion of providers have been forced to suspend, or cease, operations, leaving large numbers of staff unemployed.

With ongoing restrictions on numbers of international students, and the ongoing uncertainty around vaccination roll-out, it is unclear when and if the VET and ELICOS sectors will recover.

In that context, it is particularly important that Australia develops a clear strategy to support providers to transition to the changed education landscape and the priorities for that strategy can be identified as follows:

1. In the short-term, governments at all levels should extend wage subsidies to the VET and ELICOS sectors to ensure that qualified and experienced staff remain in the sector, to provide education for international students when international borders are re-opened and to continue to deliver quality education experiences for domestic students.
2. In the longer-term, the emphasis should be on reforms that support and encourage professionalisation of the VET and ELICOS sectors as this is essential to the provision of the quality educational experiences required to maintain Australia's status as a destination of preference for international students.

In a more general sense, we would also argue that a key priority for the new strategy should be to ensure that international engagement benefits a range of faculties, including education and the arts, and that it is not centralised within science and technology faculties.

#### 2.2. 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?

Our union agrees that a central objective of the sector should be to provide learners with a world-leading experience. We would, however, caution that the ability of a given provider to achieve this objective is crucially dependent on teaching staff and the extent to which their working conditions provide a secure, professional teaching and learning environment.

Our union has consistently argued that the greatest challenge facing the VET and ELICOS sectors is an overreliance on casual and short-term modes of employment for teachers,

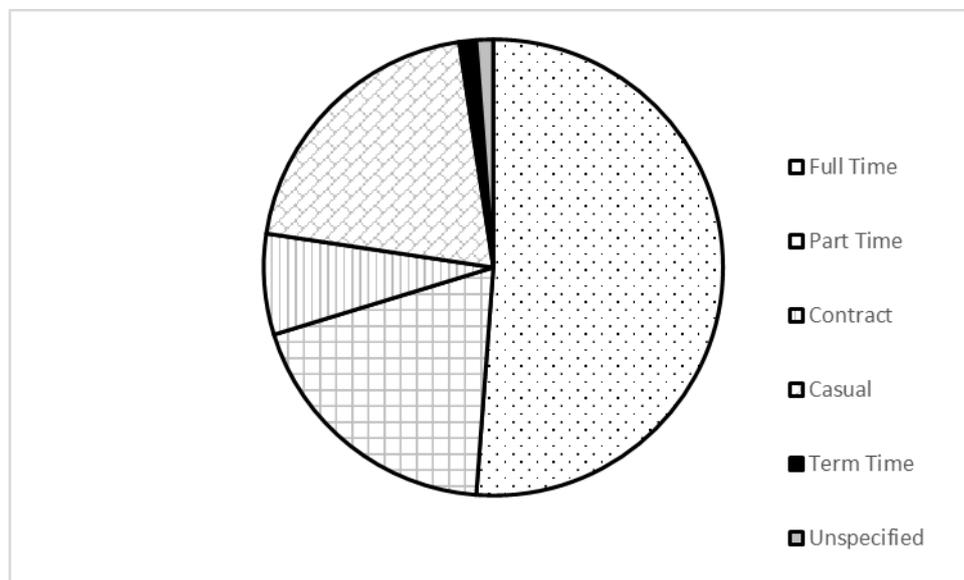
trainers and assessors because this has a direct effect on the quality of education offered to students.

Several recent studies have demonstrated that teachers' working conditions are inextricably linked to student outcomes, with favourable work conditions predicting higher rates of student achievement/growth in a number of subject areas [2-4], including English language learning [3].

Analysis of membership data from our Queensland and Northern Territory Branch clearly indicates that the VET and ELICOS sectors rely heavily on teachers employed on casual and short-term contracts (Fig. 1), with just 51% of staff employed on a full-time basis and even those who are employed full-time work under Award (and sometimes lesser) conditions that are significantly less favourable than others within the education sector.

Typically, these colleges are also open for 48-50 weeks per year, and employment arrangements are so tenuous that trainers feel that they need to work all year just to make ends meet. This leads to a 'factory' approach to education, which all-too-often results in sub-standard educational outcomes. It is difficult for trainers to provide quality education if they are teaching non-stop all year, and have no time for reflection on their practice, or for rest and recuperation.

These factors work together to significantly constrain the quality of learning experience provided to students and are a source of significant professional frustration for our members, who have little to no access to planning, preparation and correction time or professional development activities.



**Figure 1: Mode of employment, QNT Branch Members**

Any effort to maintain and enhance quality assurance mechanisms and policy frameworks must, therefore, address not only conditions for students, but also the working conditions of those providing instruction.

To achieve this goal, government funding and regulation should be distributed in ways that support quality, independent, not-for-profit training providers who employ qualified educators delivering individualised learning and challenge the current dominance of providers who deliver limited practical skills development for students.

It is also important to note that the increase in online and virtual learning to support VET qualification completions, and partial completions, does not recognise the diverse learning needs of many participants in this sector and will ultimately provide Australia with an unskilled labour force in essential and growth areas including health and construction. A skilled tradesperson needs extensive practical training, rather than online learning.

Domestic students should also benefit from the global context with continued support to complete part of their study overseas. This provision should also be available to students in the VET as well as the university sector.

One further initiative that could assist in professionalisation of the sector would be the introduction of registration/accreditation of VET and ELICOS teachers, similar to schemes for teachers in schools.

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

Australia's capacity to compete in the international education sector is dependent on supports that enable stable, high-quality providers.

Given that the need for stand-alone English study co-exists with a need for transition to further study, it is imperative that the sector continue to cater to both. It is important however, to note that there have been numerous media reports of declining English standards for international students (e.g. [5-7]). In addressing public concern around this issue, Government should be compelled to do more to support students in successfully learning English. In this context, the working conditions of English Language Teachers are of substantial importance.

At present, the sector is characterised by high levels of casual and short-term employees (Fig. 1). This lack of investment in teachers is the single greatest threat to quality of educational outcomes and Government should be actively seeking to professionalise the sector, rather than creating conditions which not only allow, but reward, business operators who undermine the professionalism of their own staff by providing insecure, unstable working conditions.

While it is important that there is flexibility within the sector, this cannot come at the expense of working conditions as these are essential for quality educational outcomes.

Another point of note is that, in determining metrics for measurement of successful transitions to work and further study, it is essential to measure course completion rates, rather than course commencements.

In terms of branding of the sector more broadly, if the intention is to highlight the quality of Australian offerings compared to their international competitors, moves to enhance the professionalism of the Australian workforce should be a fundamental goal. Ideally,

practitioners should also be supported to undertake research into effective VET and ELICOS pedagogies.

In this context, it is also important to recognise that the agility which allowed selected providers to remain operational through the COVID-19 pandemic was based on utilisation of technology-based solutions, but that this response will not enhance Australia's position in the international market in the long-term.

To 'future proof' young people in the emerging landscape they need Interactive and social engagement opportunities in their development of transferrable skills. In addition to flexible online learning, it is essential to retain and renew the quality, face-to-face delivery that blends theoretical learning with the development of practical and transferrable skills like communication, collaboration, initiative and problem solving.

Australia's capacity to deliver these in a cross-cultural context is a key factor setting it apart from its competitors and it is this, rather than a wholesale shift to on-line learning, which will secure the industry's long-term future.

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

Our union would caution that, as the VET and ELICOS sectors respond to the changes to the education landscape as a result of the COVID-19 pandemic, the primary focus of reform should be to enhance the quality of education provided for students, rather than the pursuit of specific international education markets. Only by focussing on the quality of education offered to both domestic and international students will the sector become a truly robust, leading destination for students from a diversity of nations.

Similarly, any specialisation in specific disciplines should emerge from the unique Australian education and training landscape, rather than trying to match the needs of other nations. An emphasis on quality education, and the working conditions that are conducive to it, will allow Australian providers to emerge as world leaders and sustain that position over the long-term.

With respect to models of delivery, it is likely that delivery of quality education will require individual providers to offer a variety of teaching and learning experiences within individual units and we would, therefore, caution against over-investment in any one mode of delivery. As for discipline areas, decisions about how best to deliver learning programs should be made by professional educators, responding to the unique and situated learning needs of specific cohorts and individuals and not mandated, or incentivised through differential access to funding and resources.

It is also worth noting that more fluid movement between the higher education and VET sectors, and a bespoke approach to tailoring qualifications to suit a variety of student aspirations, is likely to characterise education markets for future generations.

Realisation of such an approach is likely to require revision of the Australian Qualifications Framework, allowing credit points from different sectors to be merged to form new qualifications.

Data that identifies the growing and emerging employment sectors is readily available and opportunities for students to design their own learning around a mandatory core will increase their engagement in growth areas as students seek opportunities to bring their own strengths and passions in to their qualifications.

**2.5. 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?**

Extensive research, and research-informed policy has, for some time, indicated that students require a balance of fundamental skills and domain-specific knowledge in order to transition from education to employment, and to navigate career changes over the course of their life. The ELICOS sector in particular has a key role in provision of fundamental English language proficiency for those from non-English-speaking backgrounds and should, therefore, be adequately and appropriately resourced.

Similarly, the VET sector plays a key role in development of industry-specific skills, but decades of haphazard reform have weakened, rather than strengthened, the capacity of the sector to respond to industry needs. While TAFE has a vital role in setting benchmarks for the VET sector, and in effective and efficient provision of training within the regions, private RTOs offer an opportunity to respond rapidly to changing needs of various industries.

Unfortunately however, the emphasis on agility has eroded the quality of education provided by many of these organisations. As professional educators, our members routinely report that their employers' failure to provide secure, professional employment to teachers, trainers and assessors undermines the quality of learning experience that can be provided to students. Unless and until employers are compelled to invest in the provision of quality education, other reforms will fail to meet the needs of students and industry.

Face-to-face delivery by skilled teachers is a key means of ensuring support for diverse learning needs and diversified programs. It is, for example, common for VET students to require literacy and business services skills embedded in their training. Some lack of completion and poorer employment outcomes in the VET sector can be attributed to this as students, regardless of how skilled they may be in an industry area, need cross-disciplinary skills to apply for work, promote their work, quote for jobs *et cetera*. In the university sector students are required to complete electives that enrich their broader education and the VET system of the future should provide similar opportunities for VET students.

**2.6. How do we create a uniquely Australian education experience? i. What is our value proposition for both international and domestic students? ii. How do we offer an Australian education experience while complementing the value of Australian offshore and online education?**

The primary goal of the VET and ELICOS sectors should be provision of quality education. Were the quality issues of the current system addressed, international students would be more inclined to choose Australia as their preferred location and that preference would persist through further disruption.

As indicated in response to other discussion questions, historical reforms to the sector have seriously undermined the quality of education on offer in the VET and ELICOS sectors and, without incentives to enhance the quality of education on offer, many private providers will

continue to offer substandard education which will, in turn, have a negative impact on Australia's reputation as a provider of international education.

### **2.7. 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?**

In an Australian context, disparaging views of the VET and ELICOS sectors are a direct consequence of successive waves of ineffective, destabilising, reform.

A 2015 Productivity Commission inquiry [8] clearly established that inadequate government support for, and regulation of, the VET sector has led to proliferation of unscrupulous operators, and the exploitation of students from vulnerable cohorts.

Attempts to encourage excessive commercialism in the sector are a driving force behind initiatives such as the recent development of professional standards for Further Education and Training practitioners in Queensland [9, 10].

These standards, in conjunction with other changes to the operation and delivery of vocational training in Queensland, and nationally, are expected to lead to increased emphasis on the quality of the training received by vocational students and the quality of vocational trainers and assessors delivering this training.

This parallels changes in the school education sector over the past decade and IEUA-QNT commends the initiative as a means of recognising and enhancing the professional standing of VET practitioners.

In the current regulatory and operational environment however, the ability of individual VET practitioners to engage with initiatives such as the introduction of professional standards is limited by the extent to which their employment conditions provide a secure, professional teaching and learning environment.

At present, the sector is over-reliant on employees on short-term, casual contracts (Fig. 1) and there is potential for the burden of compliance with, and certification against, the standards to be borne by the individual, with little to no flow-through to the provision of quality education.

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

As indicated in response to the previous discussion questions, any strategy for international education must consider how government might best support provision of quality education. This is the only effective way to ensure sustainability of the sector after decades of destabilising reform.

A significant impact of this reform has been a long-term trend of declining employment conditions for teachers, trainers and assessors which must be reversed to ensure that these vital education workers are able to provide both domestic and international students with quality learning programs.

As the sector recovers from the disruption caused by the COVID-19 pandemic, it is also essential that use of digital learning platforms is tempered with provision of face-to-face learning experiences as these are essential to the development of enabling skills such as literacy, numeracy and business operation. An over-reliance on on-line learning will not

deliver the quality of education required to maintain Australia's position as a destination of choice for overseas students.

#### **4. Concluding Comments**

Our union strongly supports greater recognition of the contribution of the VET and ELICOS sectors to the education sector more broadly. We would however, argue that reforms designed solely to support employers do relatively little to support the teachers and instructors who carry out the essential work within the sector, and are therefore, likely to undermine the quality of education on offer.

Current working conditions for VET and ELICOS educators are far below the standard enjoyed by their counterparts in other sectors (e.g. schools and universities). This does little to promote the attractiveness of the profession and this, in turn, does little to ensure that best practice prevails. Without professional pay and conditions, any attempt to raise the quality, and – importantly - perceived quality, of instruction provided is futile.

We would therefore suggest that government aim for an international engagement strategy which includes specific commitments aimed at raising pay and conditions for those who work in the sector.



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**Federal Secretary**  
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**11 May 2021**

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