



INDEPENDENT  
HIGHER EDUCATION  
AUSTRALIA

A photograph of four students sitting around a table, engaged in a study session. They are looking at books and papers. The scene is brightly lit, suggesting a modern educational environment. The students are diverse in appearance, representing international students.

# IHEA'S SUBMISSION: AUSTRALIAN STRATEGY FOR INTERNATIONAL EDUCATION 2021-30

12 May 2021



**Submission to:** The Department of Education, Skills and Employment  
**Response to:** *Australia's new International Education Strategy*

## **Independent Higher Education Australia**

IHEA is a peak body for Australia's registered and accredited independent higher education providers with campuses across Australia.

The majority of Australian independent providers are members and educate students in a range of disciplines including Law, Agricultural Science, Architecture, Business, Accounting, Tourism and Hospitality, Education, Health Sciences, Theology, Creative Arts, Information Technology and Social Science. IHEA members are higher education institutions with both for-profit and not-for-profit models and educate domestic and international students in undergraduate and postgraduate programs.

The Australian independent higher education sector comprises more than 140,000 students and 120 institutions, with independent providers variously accredited to offer courses across the full AQF range.

Membership of IHEA is only open to providers that are registered with the Australian regulator – Tertiary Education Quality and Standards Agency (TEQSA). Membership is also conditional on continued compliance with IHEA's Code of Good Practice.

**IHEA's primary goal is promoting equity, choice and diversity for all Australian higher education students.**

## **Executive Summary:**

IHEA members thank the Department of Education, Skills and Employment and the Council for International Education for the opportunity to provide feedback into the consultation on Australia's New International Education Strategy.

The key points of IHEA's submission are:

- The Strategy needs to formulate goals to guide and align decision-making and messaging by all sector stakeholders and government agencies and jurisdictions
- The Strategy needs to be underpinned by strong social licence developed by better integration of international students into Australian society
- The proposed appointment of an International Education Champion to lead coordination of the industry across all levels of government, agencies and elements of the sector; build community confidence and endorsement of the industry; and support stakeholder achievement of the measures of success identified by the Strategy
- The sector needs better access to data and intelligence about markets, products, student expectations and competitors
- There needs to be a review of the ESOS Act, visa settings and regulations that govern the sector to align them to the new Strategy
- Online learning needs to feed into Australia's international education offering differently with quality assurance in place and without unnecessary or outdated restrictions
- Post-Study Work Rights and migration settings need to be redeveloped to ensure Australia remains competitive in the global market and that the benefits of international education can be felt and recognised by the broader community
- The government should provide assistance to independent providers to access foreign markets effectively and encourage diversity

## **IHEA's Response to the Consultation Questions:**

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

The Strategy's objective should be to formulate a vision and set of goals for Australian international education stakeholders to work towards and to guide their decision-making. Actions and policy settings need to be directed towards this common purpose and vision for a thriving and sustainable international education sector. It needs to determine measures of success for the sector and provide guidance on how to achieve them.

The key underpinning of the Strategy will be social licence and public and government support for international education in Australia. A unified approach between different education sectors is required to ensure that the Australian public sees the economic and also social value international education has for the broader community.

There is a need to better recognise and encourage pathways for international students and to ensure the Strategy acknowledges and affirms the progression from secondary school, through ELICOS, Vocational Education and Training and Higher Education. The interdependence of all sectors needs to be considered and connections between them developed in order to create a strategy that integrates different sectors of international education and aligns policy to allow all sectors to thrive.

The other priority should be to ensure that there is a unified approach to policies and messaging for international education between the states and federal government. At the moment these different jurisdictions are responsible for various areas of international education, such as schools, higher education, marketing and agreements and treaties with different source markets. Each state has its own target source countries and policies relating to international education and international students and it is often seen as a divided and incoherent framework in which providers, agents and students must operate. Bringing the various jurisdictions together behind a unified strategy and message for international education is crucial to the ongoing success of the sector.

Some discussions during the consultations about the new National Strategy have proposed various initiatives to address this short coming in the way the sector operates, but underpinning these proposals is a recognition of the existence of the problem. Adding layers of bureaucracy will not assist the sector, but finding the right mechanism to provide a unified voice is absolutely crucial.

There needs to be a champion for international education that can oversee the different jurisdictions and elements in the sector and bring them together into unified and coherent planning and policies. That champion can bring a voice and control messaging about international education in Australia as well as being a visible commitment from government to the sector. The champion could also create accountability for stakeholders meeting different measures of success as determined in the Strategy and its action plan. IHEA's proposal on this is explored further below.

### **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?**

IHEA members are very supportive of the "Students at the Centre" focus of the new National Strategy. To make Australian higher education successful, it needs to be student centric and this applies as much to international students as domestic. This means that students should be provided with all the support and auxiliary services they need to successfully complete their studies. They also need to be given opportunities and encouragement to integrate and participate in Australian society as much as possible.

The focus of our international education should be achieving outcomes for the students. Those outcomes will be centred around learning, employability, skills development, migration and also life experience more generally. Students will come to Australia and study with Australian providers for a variety of reasons and with potentially very different aims. Gearing policies too narrowly to provide for only some of these outcomes to be achieved would be counter-productive to a thriving and diverse sector.

Data and intelligence is crucial to understanding different source markets and student cohorts and their motivations for undertaking study with a foreign provider. IEAA's valuable report from June 2018 provided some good recommendations about the provision and use of data on international

education in and by the sector.<sup>1</sup> This report provides a good guide as to the gaps that could be filled to assist the sector in accessing data necessary to make important decisions about international education programs. The pre-EVCC data group provides a good forum for interaction between those in the government gathering and analysing data and the stakeholders in the sector using it. That group and the data it generates and shares has become particularly useful during the pandemic. The extra data provided to peak bodies and the sector more generally during this time has shown the capability of different government departments to cooperate to provide data and analysis that greatly benefits the sector and the continuation and expansion of this is necessary for its future success.

Providers also need to understand the markets they are in and prospective markets and opportunities around the globe for expansion and development of offerings so that the education offered fulfills student demand and expectations. There is also a need, therefore, for good data and intelligence on competitor markets and what they offer as their value proposition. To remain globally competitive, the sector needs to understand what it is offering and why that represents value to the international student and how to differentiate that from other nations seeking to compete with Australia.

It is important to ensure that students coming to Australia or studying with an Australian provider receive the education and skills that they are seeking, contextualised for their specific circumstances and outcomes sought.

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

COVID-19 has shown providers and students what is possible in an online learning environment. Providers and students had to quickly adapt to the rapidly changing situation at the beginning of the pandemic, but since then they have developed better skills and understanding of teaching and pedagogy in the online learning space.

Years ago, online teaching and learning was very different and the student experience was nothing like a classroom environment. Generally speaking, lecturers, trainers and teachers have enhanced their understanding of online pedagogy and what is possible in online delivery so that the experience offered has been greatly advanced.

Given these changes and adaptations in recent years, it is important to review what is meant by the term online learning and to rethink biases against this type of learning and delivery. The reputation of online learning in external markets in the past has been poor. Regulations around the extent of delivery that could occur online as part of a qualification were designed to respond to these older views of the online learning space. With the advances in technology and teaching capabilities, this policy needs to be reconsidered.

Online and offshore offerings need to be balanced, however, with the ability to study onshore for those who want to. Recent studies have shown that the vast majority of international students want to travel to study at an international provider.<sup>2</sup> Opportunities presented by offshore delivery, third party provision, online and mixed offshore and onshore delivery should all be considered, but in the context of retaining onshore delivery as the core offering for students.

There is a need to ensure there is maximum flexibility of opportunity of offerings for international students. They should be able to study through various modes of delivery while also having access to the classroom, Australian society, Post-Study Work Rights and migration pathways. Work rights need to be accessible to more students and accessible through different modes of study.

The new Strategy needs to include some new thinking about the migration restrictions and the idea that all students coming into Australia need to be “Genuine Temporary Students”. The taboo of students who want to remain in Australia and seek permanent migration outcomes needs to be

---

<sup>1</sup> International Education Association of Australia, *International Education Data Gaps: Sector Perspectives*, Consultation Report, June 2018.

<sup>2</sup> Jonathan Chew, *Navitas Agent Perception Report: Findings from Agent Research Conducted in March 2021*, Navitas, April 2021; IDP, *International Student Crossroads*, May 2020, available at: [Resources | IDP Connect \(idp-connect.com\)](https://www.idpconnect.com/resources)

addressed and making all students attest to their intention leave Australia when they complete their study needs to be rethought. Ensuring the student is a genuine student is important, but Australia should be seeking to attract students to study here and go on to be the best and brightest of the country and make a valuable contribution to Australian society. This is of particular benefit to Australia where we encourage students studying in areas of skills need. Offering a clearer and easier path to migration for these students would serve both Australia's and their interests. This will be what ensures Australia remains competitive.

**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?**

IHEA members are concerned with the current uncertainty around Post-Study Work Rights and the visa settings for international students. For students who travel to Australia to study (or would have if they could) with the motivation of continuing on after completion of their qualification to gain work experience and a career, it is important to protect Australia's reputation by ensuring that students are given what they were/are promised. Those promises also need to meet current expectations about what is possible and desirable in terms of mode of delivery and location of the student beyond the pandemic. Other countries have been much further advanced than Australia in this policy area, particularly with their Post-Study Work Rights settings, and it is hard for Australian providers to compete while Australia's position remains unclear. These settings need to be explored in the context of short term and longer-term outlook to ensure Australian providers are not left behind.

Given the advances in education and the changing nature of the geopolitical context Australia finds itself in over the 20 years since the ESOS Act was passed, it is time to review the legislation thoroughly to ensure that it creates the right settings for Australia's international education sector to prosper. The ESOS regulations need to align with the new Strategy to ensure the outcomes being sought are able to be achieved. Contradictory policies determined by the regulator, visa settings and education policy will undermine the achievement of the Strategy.

TEQSA's approach to online delivery during COVID-19 assisted many providers in being able to transition online to continue to educate international and domestic students. The justification for restrictions around online delivery need to be reconsidered in light of the advances made during the pandemic. Quality assurance and regulation needs to be maintained to ensure that the reputation of the sector is not diminished, but where quality can be assured, other barriers to innovation in the delivery mode and offerings to international students should be reconsidered.

The development of the Undergraduate Certificate as a swift response to COVID recovery and the need for rapid reskilling, showed how the sector could innovate quickly when it was necessary. Further work could be done to ensure that quality educational products can be delivered to international students to meet the demand of different cohorts. The other lesson from the development of the Undergraduate Certificate is the possibilities of innovation that can occur when the sector and the regulator work together towards this common aim.

Barriers to this kind of innovation that are created by visa settings or other elements of the regulatory environment need to be removed through more flexible approaches to visa restrictions and requirements and reconsideration of the reasoning behind their implementation. After the review of the ESOS Act and the delivery of the new National Strategy, the Department of Home Affairs should review the visa settings for international students to ensure all elements of regulation and policy are aligned to achieving the outcomes and goals of the National Strategy.

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

IHEA members need the government to provide better support for independent providers and smaller institutions to access international markets. Diversification into varied source countries requires a good understanding of those markets and an analysis of the opportunities that are most viable. This often presents an obstacle for smaller providers as they do not have the resources for market

analysis. One way to encourage diversification in source markets is to assist smaller providers overcome this barrier.

There is also a need to offer diversity to attract it. If public universities remain the only focus for overseas markets, then there is an issue in the diversity of supply. Students in different countries may be attracted to the distinct offerings and strengths of independent and smaller institutions and this should be utilised to attract more diversity.

There is also a need to ensure that profits can be repatriated from the partner country to provide an incentive to access students there. Where a provider makes an investment in offshore delivery and TNE, there needs to be a return on that investment. It is harder to justify operations in these markets when profits cannot be repatriated to Australia. Government assistance for smaller providers to access markets and intelligence on different source countries and also providing the structural setting necessary to lower the risk and cost of the investment would encourage greater diversity and innovation from Australian providers.

To ensure the reputation of the Australian provider is protected in third party relationships for overseas delivery, government needs to assist in providing infrastructure that allows for relationships to develop with quality, reliable global partners. Conducting diplomacy and negotiating agreements with foreign governments to make accessing different markets easier and less risky would be beneficial to developing diversification opportunities.

Relationships between governments are important to provide the supply side of international education and to allow interchange between markets. Programs that allow for exchange experiences and for the soft power elements of international education to become more visible to the broader community are important to opening up markets and gaining community awareness and support for international education. Expansion of programs such as the New Colombo Plan to independent higher education providers would be one step towards this goal. Allowing more Australian students to benefit from the exchange experience and international education would go a long way to assuring the public of the positive outcomes that can be achieved through study abroad.

Education agents can also fulfill a valuable role in stimulating diversification of markets and courses, particularly for smaller providers. Utilising quality agents to provide access and understanding of a foreign market creates opportunities for sourcing students seeking to study at an Australian provider. For this to be most effective, a regime for certification of education agents should be developed to ensure the proper training and effectiveness of the agents in facilitating genuine student entry into Australia. This would assist providers and students to identify the best agents with the deepest understanding of the Australian educational and migration system.

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

The skills that are necessary for students to have in the future is dependent on the student's intention when enrolling to study at an Australian institution. Students who seek employment in Australia may need very different skills to those who seek to return their home country that has a different economic and social context for their career. Data suggests that at least initially, around half of international students who study in Australia remain in Australia and half return to their home countries to seek employment.<sup>3</sup> In the longer term, about 20 per cent remain in Australia as permanent residents.<sup>4</sup> Students need to be able to access the skills that suit their desired future prospects.

In general, a focus on soft skills, such as problem solving, communication, teamwork, adaptability and resilience are increasingly demanded of graduates. Employers want graduates with skills beyond their qualification. It is the people skills that are developed through, but also around, the educational experience that create employability for graduates. Innovative pedagogy needs to be created to allow for the development of these skills while students are studying.

It is also important that the education is contextualised in the opportunity to develop these skills through means other than simply the education side of students' Australian experience. Being able to work while they study, and to volunteer as well as participate as fully as possible in Australian society

---

<sup>3</sup> Douglas Proctor, *The Social Impact of International Education*, International Research Roundtable 2016, Outcomes Report, International Education Association of Australia, p. 10.

<sup>4</sup> Bob Birrell, *Overseas Students are Driving Australia's Net Overseas Migration Tide*, The Australian Population Research Institute Research Report, April 2019, p. 14.

allows for these other skills to develop alongside the skills and knowledge derived from the education. The recent changes to the CRICOS requirements and the exemption for courses that allow students to gain short qualifications that assist with employment was a recognition of this and a positive move for employability and skills development. The more integrated into Australian society the student has the opportunity to become, the more these human skills will develop. This will also assist with developing understanding and support for international education among the broader Australian community.

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

IHEA members would like to see some more flexibility in offerings encouraged by the potential of micro-credentials and short course offerings to international students. Offering training and skills that are needed for reskilling and upskilling has the potential to appeal to new markets of international students, both in terms of source country and type of student.

This also needs to be balanced with the need to ensure and protect the quality of the educational experience being offered to international students. Finding mechanisms that allow for the delivery and recognition of quality shorter qualifications and training would benefit the sector. Student cohorts that are different to those who seek to gain full degrees could be accessed. Those seeking to upskill, reskill or retrain could be given opportunity to do so in Australia and with Australian providers offshore.

Work Integrated Learning is an important aspect of developing a student's employability and is becoming more common place in the educational experience.<sup>5</sup> International students, though, are less likely to undertake WIL placements and to gain the benefits for their employability that derive from foreign work experience. A recent study conducted by Universities Australia identifies some key barriers for international students undertaking WIL.<sup>6</sup> Work needs to be done to ensure that international students are given support to be able to access the same opportunities as domestic students and engage in WIL to develop skills that are crucial to employability and career outcomes. Students with experience in the Australian workforce are much more likely to find employment.

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

A uniquely Australian education experience relies heavily on physical presence in Australia. In order to experience Australian culture and society, students need to live and interact within it. Australian education has a global reputation for quality. Other nations also offer quality education. The value proposition for international students comes from the combination of factors that Australia has to offer; the quality, pricing, living in a safe and healthy society, Post-Study Work Rights and policies around migration and employability, including work rights while studying, all feed into the experience.

In order to make it "uniquely Australian", those settings need to present a point of difference from other markets and represent value for international students. All of the aspects listed above need to be combined with Australia remaining a safe and welcoming destination for international students. Damage to that reputation that has been created through the pandemic needs to be repaired to restore demand for an Australian educational experience.<sup>7</sup> The policies and statements that caused that damage also need to be assessed and learned from to ensure the problem is avoided in the future.

## **I. What is our value proposition for both international and domestic students?**

At the heart of Australia's value proposition is a high-quality education and qualification that is recognised widely across the globe. An educational experience that creates opportunities and

---

<sup>5</sup> D. Jackson, "The Contribution of Work-Integrated Learning to Undergraduate Employability Skill Outcomes", *Asia-Pacific Journal of Cooperative Education*, 14(2), 2013, 99-115.

<sup>6</sup> Universities Australia, *Work Integrated Learning in Universities: Final Report*, April 2019, pp. 20-25.

<sup>7</sup> Jonathan Chew, *Navitas Agent Perception Report: Findings from Agent Research Conducted in March 2021*, Navitas, April 2021; IDP, *International Student Crossroads*, May 2020, available at: [Resources | IDP Connect \(idp-connect.com\)](https://www.idpconnect.com/resources)

pathways to further study or career prospects is what students value and so Australia offering its education within the right migration, visa, regulatory and educational policies is key for international students and also to domestic students.

The Federal Government has worked on ensuring that Australian qualifications are recognised overseas. The Lisbon and Tokyo Conventions, and the UNESCO Global Convention and other treaties relating to mutual recognition of higher education qualifications between countries have been a positive step in advancing this aim. The more widely accepted and recognised Australian qualifications are at all levels, the greater the potential benefit of an Australian education. Opportunities to expand that recognition, including of different delivery modes and options, should be sought and acted on.

Ultimately, each student has an individual understanding and expectation of what represents a value proposition for them and so understanding the student voice is crucial. The Council for International Students Australia is a good example of a student representative body that could be more effectively used to ensure that the Australian government and public can appreciate international students. It cannot be expected to do this, however, without more financial support and resources so that it can operate in a way that provides greater access to the student voice for sector stakeholders.

Domestic student bodies should also be given a greater hearing in policies and issues that impact them. Ensuring that domestic students feel enfranchised and heard is important to creating the social licence for international students to come to Australia and to ensure that those international students are welcomed and embraced into the communities they enter.

Being able to be adaptable and responsive to the messages that domestic and international students pass onto the sector is another crucial element to ensuring that the value proposition is maximised. Overregulation and outdated policy settings do not serve the sector well and there needs to be mechanisms for interaction between different stakeholders in the sector to come together to present a voice to government to amend policies and regulatory settings where necessary. The International Education Stakeholders Forum, and other sector bodies could be more effectively used for this purpose.

## **II. How do we offer an Australian education experience while complementing the value of Australian offshore and online education?**

IHEA members see value in offering a variety of educational experiences to international students to meet the different needs, motivations and expectations of students. The core delivery and experience demanded by international students will remain onshore education. Most students are motivated to study at a foreign provider by the experience of travelling and living in a different environment and gaining experience abroad.<sup>8</sup> The key to innovating and expanding offerings, however, is flexibility and meeting the demands of a range of students. Some students would prefer to remain in their home country while studying at least part, if not all of their qualification.<sup>9</sup> Being able to attract and offer products to all of these students is important to the continued success of Australia's international education sector.

Providing the outcomes students seek from their education, in terms of employment, further study, migration or other opportunities, in a way that is unique to Australia is the key to offering value to offshore and online education. Allowing more flexible eligibility to Post-Study Work Rights and migration pathways is an important element to this.

Lifting the reputation of online learning abroad, through the development of quality online delivery, is also important to expanding the offshore market for Australian education. It is also important that the Australian government focuses on ensuring that foreign markets are receptive to Australian providers and the delivery of Australian education in their countries. Treaties and agreements that create an environment that is conducive to partnering with

---

<sup>8</sup> IDP, *Digital International Student Survey 2019*, accessed at: <https://resources.idp-connect.com/digitalinternationalstudentsurvey2019>

<sup>9</sup> IDP, *Digital International Student Survey 2019*, accessed at: <https://resources.idp-connect.com/digitalinternationalstudentsurvey2019>

providers offshore and that ensure there is a value proposition for Australian providers to operate in the offshore environment are needed. Target markets need to be identified through the gathering of good data and intelligence and appropriate support given to providers to take advantage of opportunities as they arise.

## **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 the wider community?**

IHEA members see the need for a whole of government buy in to the benefits of international education for the nation. Each state government as well as the federal government and its agencies need to be aligned in their support for the sector. Playing politics with international students does not assist the sector to thrive. The whole of government needs to buy in to the value and importance of international education and the Strategy that is designed to support it to ensure its future success. Government messaging at all levels then needs to reflect the agreed strategy for the sector so that Australian society is not given mixed signals about the importance and value of international education or the value of international students for our country and the Indo-Pacific region.

Well-intentioned policies, such as regionally focused incentives for international students, can inadvertently lead to messaging that problems, such as urban congestion, should be blamed on international students. Careful thought needs to be given to issues that arise and a positive approach taken to resolving them. Sector consultation and engagement is also important. Students should not be coerced into decisions that do not represent their best interests or are misaligned with the achievement of the outcomes they are seeking when enrolling with Australian providers. Policies can be used to guide some elements of the sector but should not cross over into diminishing the value offering of an Australian education.

Campaigns led by sector stakeholders and government departments and agencies will also play a crucial role in building social licence and community support for international education in Australia. Cooperation between government and the sector on these campaigns is necessary to show the government's commitment to making international education a success. Without a whole of government, and unified jurisdictional approach to achieving the objectives identified by the sector through this Strategy and the action plans that flow from it, there will not be success. All elements of the sector and government need to work together to assure and educate the community of the benefits international students bring to Australia and to them.

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

In order to achieve the platform on which the success of the new National Strategy needs to be built, that is a strong community and government commitment to international education, IHEA advocates for the appointment of an International Education champion. This would need to be someone who is widely respected and understands international education and its value to Australian society. Ideally, a business or foreign affairs background would provide the right sort of experience for this person to bring to the role.

An international education champion would also need to be able to lead cohesion across jurisdictions to reduce the barriers to the success of international education through strong policy settings to support stakeholder alignment. This would provide the disparate elements of the international education sector with a strong and unified voice and a conduit to government and also a point of accountability to ensure the measures of success are being achieved.

The existing mechanisms through which the sector is brought together, the International Education Stakeholders Forum, the Education Visa Consultative Committee and the Council for International Education are all useful and serve a good purpose. These bodies could be used more effectively, however, if there was deeper interaction on key policy decisions and more genuine consultation with them. These bodies could monitor the new Strategy and ensure the sector is aligned in working towards its aims. An international education champion would be able to represent each of these

bodies and stakeholders more generally and sit above them to be the visible and audible representative of the sector and its interests to the community and government.

The action plan and next steps of the process of the development of the new National Strategy are crucial to its success. Sector buy in to the process is paramount and to ensure this, the consultation process needs to give providers and other stakeholders a voice. The action plan that sits under the Strategy and helps implement it will be where most sector stakeholders individually have responsibility for it and so their involvement and participation in developing those action plans and the next steps of the consultation process is crucial.

IHEA thanks the Department of Education, Skills and Employment for the opportunity to provide this submission.

**Contacts:**

**Independent Higher Education Australia**

Author:

Dr. Sally Burt

Policy & Research Manager

Email: [sally.burt@ihea.edu.au](mailto:sally.burt@ihea.edu.au)

Phone: (03) 9642 5212

IHEA CEO:

Mr Simon Finn

Email: [simon.finn@ihea.edu.au](mailto:simon.finn@ihea.edu.au)

Phone: (03) 9642 5212