

English Australia submission

Submission on the Accord Interim Report



Sent to: Australian Universities Accord Panel
Submission via: Upload via the Department of Education website

English Australia Comments

English Australia is the national peak body and professional association for the **English Language Intensive Courses for Overseas Students (ELICOS)** sector of international education. We represent over 110 member colleges throughout Australia. These colleges provide quality English language programs to students and professionals from around the world. Many of our members are attached to tertiary education providers regulated by TEQSA.

Executive Summary:

English Australia welcomes the opportunity to comment on the Australian Universities Accord Interim Report, noting that while the focus is on Australian Universities, the decisions and recommendations that stem from the Accord panel's recommendations are likely to impact elsewhere in the education and international education system.

English Australia's response covers the following areas:

- **International education less as an industry and more as a crucial element of Australia's soft diplomacy, regional prosperity and development**

English Australia urges the panel to broaden its view of international education, knowing that key policy changes may affect communities' lives and economic situation.

- **Reliance on international students and funding**

English Australia works closely with the University sector and has seen the positive impact of welcoming international students both socially and for the sector more broadly beyond the benefits of the revenue earned from student tuition fees.

- **The nexus between migration and education**

English Australia notes there is an opportunity to greatly improve the attractiveness of Australia to high-quality international students and address Australia's many current and future skills shortages by reviewing the current barriers and limitations that are set in competing legislation across all government portfolios and developing clear and transparent pathways for international students in areas of skilled migration.

- **Understanding of international student benefits in the workplace**

English Australia notes that a major hurdle is the eligibility for roles. If employers were to rethink eligibility for the position, they advertise more international students could qualify.

- **Experiences of students while in Australia is paramount**

English Australia supports the view that the "International student experience is paramount." As a destination Australia does do well on this metric but it should strive to do even better.

- **Alumni of Australia act as Ambassadors**

English Australia encourages the panel to recommend more is done by Australian government posts in the country around supporting and nurturing alumni of Australian institutions.

English Australia's response to the Australian Universities Accord Interim Report

International education less as an industry and more as a crucial element of Australia's soft diplomacy, regional prosperity and development

The interim report states:

"The Review sees international education less as an industry and more as a crucial element of Australia's soft diplomacy, regional prosperity and development. This makes the quality of the education we provide even more important." (Page 7)

English Australia supports the panel's view that outcomes of the international education sector should include Australia's soft diplomacy, regional prosperity and development. However, it must be a central tenant to the review that International Education is currently Australia's 4th largest export sector. As such, people's livelihoods, both those who operate businesses within international education and those who benefit from the economic prosperity international brings to communities, depend on it and its success.

It is an industry.

English Australia urges the panel to broaden its view of international education, knowing that key policy changes may affect communities' lives and economic situation.

Reliance on international students and funding

The interim report states:

Infrastructure, workforce development, and research in our universities are not sustainably funded in their own terms. The ability of Australian universities to be sustainable is dependent on their ability to generate income above and beyond government funding. (Page 33)

And

University research activity is currently underwritten by international student revenue and other cross-subsidies, and this creates unacceptable risk to the future. Yet the success of Australian higher education as an international industry has led to a situation where the funding it provides is so great it cannot realistically be replaced by public sources. (Page 34)

The panel's view, as described above, is that International Education is the major funding source that institutions have come to rely on other than the government (and taxpayer) purse, which poses risk. The panel does not propose an alternative funding model.

English Australia works closely with the University sector and has seen the positive impact of welcoming international students both socially and for the sector more broadly beyond the benefits of the revenue earned from student tuition fees.

Institutions' ability to seek funding aside from taxpayer inputs should be celebrated. The role of government should be to support the role of education in society, not further remove itself from funding responsibilities.

The nexus between migration and education

The interim report states:

The extension of post-study work rights (PSWR) for international graduates with degrees corresponding to areas of skills shortage was announced at the Jobs and Skills Summit and will be implemented by the Department of Home Affairs from 1 July 2023. This will contribute to addressing Australia's critical skills shortage, and also contribute to the broader network of Australia's international connections. (Page 65/66)

English Australia supports the panel's view of international students who have studied in Australia addressing skills needs in Australia.

English Australia agrees with the recent comments of Home Affairs Minister Clare O'Neil who noted "the country needed to better use the "amazing resource" of international students after announcing the nation's permanent migration intake would increase by 35,000 this year to its highest level." (SMH 3 September 2022). This represents a significant and positive shift in policy position and recognises that historically only 16 per cent of international students stay on to work after their studies in Australia, compared to 27 per cent in Canada.

English Australia notes there is an opportunity to greatly improve the attractiveness of Australia to high-quality international students and address Australia's many current and future skills shortages by reviewing the current barriers and limitations that are set in competing legislation across all government portfolios and develop clear and transparent pathways for international students in areas of skilled migration.

Understanding of international student benefits in the workplace

The interim report states:

Industry attitudes towards hiring international students and graduates requires significant attention. Universities play a pivotal role in connecting industry with international students, including communicating the benefits of employing international students and addressing misinformation regarding international visa limitations. They also play a role in supporting international students who may not always be aware of what employment opportunities exist for them both during and post-study. Ensuring international students, particularly those studying in areas of Australia's skills needs, are connected to industry throughout their education will facilitate better pathways into employment and therefore help meet workforce shortages. (Page 66)

English Australia supports the panel's view that more is required in communicating the benefits of employing international students and addressing misinformation regarding international visa limitations.

The International Education Association of Australia has launched a [guide for employers](#) on employing international students. The sector has long spruiked the benefits of international students to Australian workplaces but has previously not advised on how to do it. This can serve as a resource in shaping future strategy.

English Australia notes that major hurdle is the eligibility for roles. If employers were to rethink eligibility for the position, they advertise more international students could qualify. Currently, advertising roles that require Australian citizenship or permanent residency is the norm. A shift to including qualified persons with Australian work rights would a move in the right direction.

Levy on International Students Fee income

The interim report states:

examining a funding mechanism such as a levy on international student fee income. Such a mechanism could provide insurance against future economic, policy or other shocks, or fund national and sector priorities such as infrastructure and research. (Pages 23 and 155)

English Australia rejects the suggested funding mechanism and views this as a disincentive for successful entrepreneurial behaviour. While funding should be placed aside, the decreased public purse allocation over the past two decades should be a benefit to draw upon. In a once-in-one-hundred-year event where borders were forced to close the education sector did not require the level of funding support to continue such as aviation. In fact, education, other than the innovation funds (\$18m allocated but not fully utilised) was the only additional money the government spent in supporting education specifically. All other support was in the form of general industry support and was accessed along with other sectors.

In addition, providers already make payments as a percentage of their international student revenue in the form of the annual Tuition Protection Service Levy and the Annual CRICOS Registration Charge based on the number of international student enrolments.

Experiences of students while in Australia is paramount

The interim report states:

International students can face a range of significant pressures as they adjust to living and studying in Australia. This can include social isolation and financial hardship, noting international students incur additional costs compared to domestic students, and are more vulnerable to workplace exploitation by unscrupulous employers. The Review is examining the role of universities in providing information to international students, so they are informed of their rights and protections under Australian law, and whether this requires significant enhancement. For example, the Assurance Protocol is an agreement between the Department of Home Affairs and the FWO which provides support to student visa holders who approach the FWO for help. This provides a safety mechanism for students or employees to raise issues of workplace exploitation without the risk of it leading to their visa being cancelled, even if the issues have caused a breach of their visa conditions. (Page 134)

English Australia supports the view that the “International student experience is paramount.” As a destination Australia does do well on this metric but it should strive to do even better.

In fact, the International Student Survey of English Language Intensive Courses for Overseas Students (ELICOS) 2022, was conducted from June to September 2022. Under the auspices of English Australia, the survey was conducted by i-graduate using the English Language Barometer (ELB) survey and was fully funded by the Australian Government Department of Education through the Higher Education Support program fund. It was the seventh occasion on which English Australia, i-graduate and the Department of Education have collaborated to conduct the survey for the Australian ELICOS sector since 2010.

A total of 6,140 students responded to the survey, representing a response rate of 67%, from 42 English language centre locations throughout Australia, online and overseas, a commendable effort by language centres and students given their pandemic-impacted circumstances.

As in previous years, the core questionnaire covered arrival, learning, living, support, recommendation, application, and choice of institution, utilising the semi-standardised online format of i-graduate’s English Language Barometer, adapted and customised for the Australian English Language sector.

The 2022 survey results showed almost identical levels of satisfaction compared with the 2019-20 survey, a remarkable result given the challenges for students and centres due to the COVID-19 pandemic. Students were asked: “Would you recommend your language school/centre to others thinking of applying here?” 82% of respondents indicated that they would encourage or actively encourage others to apply, up from 78% in 2019/20.

Table 1 below highlights the level of student satisfaction across the areas of arrival, learning, living, support, and overall satisfaction. This data highlights that the current frameworks are supporting international students during their English language studies. A copy of the full report is available upon request.

Table 1: English Language Barometer (ELB) headline results.

	Australia ELB 2009	Australia ELB 2011	Australia ELB 2013	Australia ELB 2016	Australia ELB 2017/18	Australia ELB 2019/20	Australia ELB 2022
Arrival overall	N/A	N/A	90%	92%	92%	93%	92%
Learning overall	87%	91%	89%	90%	90%	91%	91%
Living overall	86%	89%	89%	91%	91%	92%	92%
Support overall	76%	83%	92%	93%	93%	94%	94%
Satisfaction overall	81%	87%	88%	89%	90%	91%	91%

Often the student experience is viewed as a transactional process. Memorable experiences are often not obtained in transactional engagements but rather developed via person-to-person engagements and group dynamics. While providing service to students may be transactional at a base level, Australia can differentiate itself via real-life experiences.

Alumni of Australia act as Ambassadors

The interim report states:

As discussed in Section 2.5, international students spend some of their most formative years in Australian universities and can be powerful champions for Australia across the world. And close connection to a cohort can be a positive part of student life for both international and domestic students. Cohorts often help each other to succeed in their studies. (Page 103)

English Australia agrees with the panel's assertion that international students *can be powerful champions for Australia across the world*.

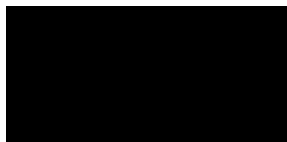
As per the section on international student experiences, international students who have had favourable experiences in Australia are some of the nation's best ambassadors. This concept should not be a new or foreign one. The New Colombo Plan is based on the notion that more young Australians studying across Asia becomes an outward soft diplomacy mechanism. The same applies to graduates who have spent time in Australian Universities, and this goes back as far as the original Colombo plan when international students from across Asia studied at Australian universities.

English Australia encourages the panel to recommend more is done by Australian government posts in the country around supporting and nurturing alumni of Australian institutions.

English Australia would welcome the opportunity to discuss any of the points raised in this submission with the committee.

For further information, please contact the undersigned.

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