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Dr. Carly Steele,

Dr. Ana Tankosic,

Associate Professor Sender Dovchin,

School of Education, Curtin University

To the Accord Panel,

Re: Submission in response to the Australian Universities Accord Interim Report 2023

Thank you for the opportunity to comment on the Panel's Australian Universities Accord Interim Report 2023.

We begin by introducing and positioning ourselves in relation to our recommendations. The first author, Steele, is of Anglo-Australian ancestry and her research focuses on promoting social justice in education for Australia's multilingual and multicultural populations. The second author, Tankosic, is a global citizen from Bosnia and Herzegovina whose research interests stem from her lived experiences of being an international student in the USA and Australia. As a former international student and now academic in Australia, Ana Tankosic experienced challenges in the form of cultural exoticisation and accent profiling. Finally, the third author, Dovchin, is a Mongolian heritage academic, who relays, through her research work with culturally and linguistically diverse Australians, her own personal experience of being an international student in Australia. Our collective fields of expertise are in Education, Applied Linguistics and Sociolinguistics with a focus on culturally and linguistically diverse peoples, culturally and linguistically responsive pedagogies, language learning, language education, language policy, language ideologies, and linguistic discrimination. Please note that the views expressed in this submission are our own and do not necessarily reflect the views of the institution with which we are affiliated.

In our submission, we examine how some of the proposals presented in Australian Universities Accord Interim Report may impact international students and those who do not have Australian English as their first language. We point out that the Accord does not go far enough to ensure international students are treated fairly and that social justice approaches to international education should be adopted. We believe that this is not only fair, but it is the only sustainable way to address entrenched issues in the university system that have been highlighted in the Interim Report. For example, the substantial difficulties that international students face, as well as the sector's reliance on international student income.

We respond to the following six items from the Australian Universities Accord Interim Report:

- **The shift from international education as an industry to soft diplomacy:** "The Review sees international education less as an industry and more as a crucial element of Australia's soft diplomacy, regional prosperity and development." (p. 7 & p. 18).
- **A levy on international student fee income:** "Examining a funding mechanism such as a levy on international student fee income. Such mechanisms could provide insurance against future economic, policy or other shocks, or fund sector priorities such as infrastructure and research." (p. 155).
- **Funding transparency:** The Accord raises the question of whether funding should be used according to the purpose it is provided, and greater transparency (p. 142).

- **Language testing and support:** “Improvements to language testing and admissions benchmarks could be considered to protect high-quality education experiences for all students and Australia’s education reputation and provide adequately tailored support where required.” (p. 93).
- **Student-centred, needs-based funding model:** “How to establish a new funding model for higher education, that: is student-centred, needs-based, ensuring the funding available is sufficient to provide access to high-quality higher education for students from equity backgrounds and from different locations.” (p. 155).
- **Educational experiences of international students:** providing a high-quality university experience for international students. The Review notes that the educational experiences of international students are reportedly worse than their local peers (p. 135).

1) The shift from international education as an industry to soft diplomacy

Whilst we welcome the suggested shift from the neoliberal economic view of international education as an ‘industry’ and international students as a ‘commodity’, the shift to ‘soft diplomacy’ is not without its criticisms and concerns.

In many ways, soft diplomacy does not deviate from the current existing economic paradigm because it is based on the ‘National Interest’. This approach to international education is not new considering that it characterised much of the post-war era (Dashwood, 2021; Horne, 2022; Kent, 2018). It is, however, both politically and economically motivated. It continues to focus on benefits that international education can yield for Australia (Dashwood, 2021; Horne, 2022; Kent, 2018). The Accord Interim Report specifically names and identifies “regional prosperity and development” (p. 7 & p. 18) as two such benefits.

We also have concerns that ‘soft diplomacy’ is not based on a two-way (or mutual) exchange of knowledges, ideas, cultures, and languages, and instead, focuses on how Anglo-western knowledge systems can be exported through education systems to wield geo-political influence in the region (i.e., “regional prosperity and development” p. 7 & p. 18). It does not value the diversity that international students bring; their differing ways of knowing, being and doing that can be shared with the Australian population. Engaging with international students offers Australians the opportunity to interrogate and reflect upon their own knowledges and belief systems, to expand their perspectives and to embrace cultural relativism. The shift to soft diplomacy does not encompass this perspective.

Instead, we would like to see the Panel adopt a ‘social justice’ (Piller, 2016) approach to international education that values international students’ diverse knowledges, ideas, cultures, and languages. Social justice perspectives focus on how to create a just and equitable society where the diversity that exists related to race, gender, ethnicity, language, sexual orientation and so on, does not unfairly impact access to resources and opportunities in life (Piller, 2016, p. 5; see also Bhurgra, 2016; Caravelis & Robinson, 2016; Moloney & Saltmarsh, 2016).

When Australia’s first international student arrived in 1923 from Wuhan, China to study – for free – at the University of Sydney, as Horne (2022, p. 104) explains, he, and other subsequent international students (who also studied for free) were admitted to Australian universities because they valued the relationship. This demonstrates that the Australian university system can and does value the two-way exchanges of knowledges and ideas, cultures, and languages

that international education represents. In fact, it was not until the Dawkins Reforms in the late 1980s that international students were required to pay full fees (Horne, 2020, p. 685-6). However, since then, these ideals have since been corrupted by the current neoliberal funding model. Consequently, public attitudes and perceptions toward international students have shifted dramatically and are increasingly dominated by negative rhetoric. This is crystallised in the statement from Prime Minister Scott Morrison on April 3rd, 2020, in response to the COVID-19 pandemic and its impacts on international students, that, “If you are a visitor in this country, it is time... to make your way home.” (Freeman et al., 2022). We would like to see a return to valuing international students for the diversity they bring and valuing international education as a mutual exchange of knowledges, ideas, cultures, and languages.

The review asks, how best to create a sustainable education sector (p. 18); we believe that sustainability is only possible when it is not exploitive. The only sustainable solution is to shift to a social justice approach in line with the ethical practice of ‘welcome’. Horne (2022) argues that the relationship between universities and international students should be reimagined to embrace and reflect the ethical practice of “welcome” based on the virtue of shared humanity. This is a step in the right direction. However, we caution against any paternalistic overtones that may be present in this messaging. ‘Welcome’ is not enculturation, cultural dominance, or cultural imperialism. ‘Welcome’ must embrace international students’ knowledges, ideas, cultures, and languages, and not seek to change them.

2) A levy on international student fee income

The suggestion of a levy on international student fee income stands in stark opposition to the proposed shift away from treating international education as an industry. Instead, it acts to consolidate the integral role that international students play in funding Australia’s universities. Moreover, it redirects that funding away from international students themselves toward institutions that they do not even attend, or infrastructure that may not benefit them.

Whilst we agree that, as the Panel suggests, this could decrease the volatility of international student revenue through a ‘future fund’ type of model, at the same time, it will cement the sector’s dependence on international students as a revenue stream. We believe that this reliance creates an unhealthy relationship between universities and international students. It encourages discourses about international students as ‘cash cows’ reducing their contribution to universities and Australian society more broadly to monetary terms, and subjects them to exploitative approaches to education, as described in the Interim Report:

Australia’s higher education system is incentivised to maximise the intake of international students and produce large student cohorts. This can be detrimental to the student experience for both international and domestic students, with large class sizes potentially diminishing students’ ability to connect with their peers and make lasting relationships throughout their studies. This is exacerbated when there is a lack of diversity within classes, leading to cohorts of international students feeling further isolated. (p. 93)

Not only does establishing a levy on international student income fail to depart from the international education as an industry approach, but it may also threaten any attempts at soft diplomacy, as other countries may perceive this action poorly. It is possible that other countries may wonder why Australia cannot fund its own higher education system, and why it

relies on their citizens to do so. This may impact Australia's image, as well as the value that others assign to the education offered by Australian universities. If the Australian government does not value its own university education enough to fund it fairly, why should the citizens of other countries?

We do, however, support the establishment of a special fund for international students, which could be funded by a levy, to provide the supports that they require for an improved educational experience. This has been suggested previously by Freeman et al. (2022) who reviewed Australia's response to international student needs during the COVID-19 pandemic. They make the following recommendation:

First, that they establish a special fund quarantining a percentage of international student tuition fees for student financial, health and wellbeing support. Such a fund could progressively provide interest-free loans, scholarships, tuition and residential accommodation fee reductions, as well as support ongoing health and well-being student services (e.g. health centres, counselling, advocacy and legal advice). (Freeman et al., 2022, p. 13)

These supports, in addition to English language learning support, which is neglected in Freeman et al.'s (2022) suggestion, are crucial for international students. The importance of English language support has been recognised by the Panel (p. 93) along with the need to improve the international student experience (pp. 134-135). Many of the factors listed by Freeman et al. (2022) are identified by the Panel as key concerns related to the international student experience. A special fund for international students is one way to meet this objective. Moreover, it represents a caring approach to international students, rather than an exploitive one.

3) Funding transparency

We strongly support greater transparency about how institutions use income from international students. It is already clear that income from international students supports university research funding amongst other aspects of operations, however, the value for money that international students receive is very unclear, especially when it comes to learning and teaching. Transparency should be used to ensure a degree of accountability for expenditure. Universities should be required to expend an agreed upon proportion of income from international students on their education i.e., the purpose for which it is provided. This would help to justify current international student fees and give international students greater confidence in the Australian university system. The special international student fund we have described above in Section 2 could help to this end. Income received from international students could be clearly shown alongside how it has been expended to better support them.

4) Language testing and support

It is common for discussions about international students to focus on their English language skills which are frequently presented as a 'problem'. The 'English-as-a-problem' perspective, as argued by Bodis (2021), is widely perpetuated by the Australian media in their representations of international students and consequently, blame is frequently ascribed to the students themselves. In many cases, international students assume personal responsibility for their perceived 'failing' when it comes to the English language (Dovchin, 2020). The 'English-as-a-problem' discourses mask the complexities inherent to both language learning

and the context of learning language in university settings. The Panel's suggestions of "Improvement to language testing and admissions benchmarks" (p. 93) will not address the situation but "adequately tailored support" (p. 93) will. Moreover, the suggestion that improvements to language testing and admissions benchmarks are required to "protect high-quality education experiences for all students" (p. 93) is firmly entrenched in the 'English-as-a-problem' mindset. It positions speakers of other languages as a 'threat' to quality education rather than holding the system accountable for the quality of education that they provide. Income from international students should be sufficient to appropriately fund English language support for students and provide targeted professional development in English language learning and teaching for university educators, and in doing, ensure "high quality education experiences for all students" (p. 93).

There are several issues with targeting language testing and admissions benchmarks to "protect" the quality of educational experiences for all students. First, there are issues with documentation, since it is possible for students to unscrupulously gain the documentation required for entry to university without the requisite level of English¹. Raising benchmarks can increase the likelihood of such behaviour presenting a greater risk to the system. There are also issues with the English language test currently being used which is in standardised English. However, the English spoken in Australia that students encounter in the classroom and socially, deviates so greatly from the language test that it is not an accurate measure of the language required for participation in university life and Australian society. Thus, students might be deemed proficient speakers of English but not possess the cultural knowledge and related language skills (i.e., pragmatics) for successful communication. Increasing the language testing admissions benchmark will not address this issue. In addition to knowledge of Australian English and cultural norms, students need to know the discipline specific language required for their university course. It is not possible for an English language test to adequately measure the discipline specific English language demands of all courses offered at university. The language demands of history courses are completely different to science courses. Furthermore, it is not just the vocabulary, but also differing genres for each discipline or subject. All this is often taught for the first time at university, in another language. Lastly, there are the social-emotional considerations of being in a new language environment. Despite, having scored highly on a test of English, a new language environment can prove challenging for international students. Often international students experience language anxiety, linguistic prejudice, discrimination, bullying, and social isolation (Arkoudis et al., 2019; Bodis, 2021; Dovchin, 2020). These factors, amongst others, impact international students' self-esteem, social interactions, and consequently, academic performance.

Given that language tests cannot account for these factors, the focus should be on the provision of adequately tailored support that can attend to, and prepare students for, the local language and learning environment. This support should take two forms: preparatory courses should be provided for international students prior to their studies, and professional development should be required for university educators to ensure ongoing English language support throughout international students' degrees. Appropriate workload and time should be given to staff to upskill in this area.

¹ <https://www.smh.com.au/national/nsw/cheating-students-scams-spells-trouble-for-all-universities-20230818-p5dxje.html>

Three types of initial preparatory courses are required: Australian English language and culture, the university environment, and discipline-specific preparation courses. The Australian English language and culture course could focus on navigating daily social interactions and the aspects of language and culture that international students find particularly difficult including the use of common Australian slang/colloquial terms, pronunciation, dialects, speech speed and differing expectations for formality. The university environment course could focus on navigating university systems, academic integrity, the student-centred learning style, and expectations for class interactions, as well as how to communicate with university educators. A discipline-specific preparatory course would introduce students to discipline specific terminology, ways of learning, assessment task types and genre expectations. These courses will help to address the concerns outlined above.

As acknowledged by the Panel, “greater professional development of staff, including cross-cultural competency in teaching and learning, is also relevant” (p. 93). Preparatory courses alone will not suffice, international students require ongoing academic language support specific to their current studies, and their university educators are best placed to provide this discipline-specific knowledge as they are the experts in their field of knowledge. However, university educators require professional development in this area. It has been reported that many universities educators do not view English language teaching as part of their “jobs” (Bodis, 2021, p. 44; see also Arkoudis et al., 2019; Joseph & Hartwig, 2020). Consequently, students are blamed for not possessing the required language skills, rather than responsibility resting with the university system to provide a high-quality education. Work is required to shift this perspective within university settings. English language support is not only useful to international students but is also useful to domestic students who require further support with academic language and university expectations. This includes students who are first in family, have language backgrounds other than English or who come from diverse cultural backgrounds (including First Nations students). These students, amongst others, are often not familiar with academic language and university expectations.

These suggestions will better meet the desired goal of ensuring “high-quality education experiences for all students” and enhancing “Australia’s education reputation”. Introducing draconian English language testing and admission benchmarks is likely to signal a return to language policies similar to those imposed under the White Australia Policy (i.e., the English language test) and project an image of a closed off elitist country. In contrast, increasing the offerings of English language support within Australia’s university system will create a sense of ‘welcome’ and position it as a world-class system and educational provider of choice globally. These changes will not only enhance the educational experiences of international students, but also for Australian citizens.

5) Student-centred, needs-based funding model

Presumably, the proposed student-centred, needs-based funding model applies only to funding for domestic students. However, we question whether it would be appropriate to consider how the system could recognise and account for the diverse needs of international students. It is worth pointing out that international students are not a homogenous group, nor are they all from wealthy backgrounds. We ask the Panel to consider whether, through the special fund for international students suggested in section 2 or an alternative mechanism, there could be funding available specifically for international students from equity

backgrounds and from different locations. This will provide the opportunity for universities to redress student inequality not just locally, but globally and in doing so, adopt a strong social justice stance as a global citizen/actor.

6) Educational experiences of international students

Ultimately, to improve the educational experiences of international students, the philosophical stance of the Australian government towards international education needs to change. The Interim Report offers some improvement by suggesting a shift from an economic perspective (i.e., “industry”) to a politically motivated approach (i.e., “soft diplomacy”), but does not go far enough. Moreover, although it signals a change to soft diplomacy, it appears that a predominantly economic approach is adopted throughout the Interim Report (for example, the suggestion of a levy on international student income to fund “infrastructure and research” [p. 155]). The Panel recognises the substantial difficulties that international students face: poorer educational experiences, social isolation, language barriers etc. (p. 93) as well as the issue of universities being reliant on international student income for research and other areas of university operations (p. 23) but offers little to address this situation. Whilst the suggestion of fully funding research may help to alleviate some of the sector-wide dependence on international student income, it does not actively improve the educational experiences of international students. The only way to ensure Australian universities are providing a high-quality university experience for international students is to shift to a social justice approach, as suggested throughout our submission.

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