

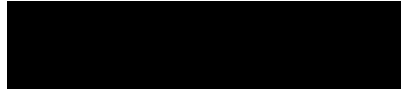
Submission in Response to the Australian Universities Accord Interim Report

from

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## EXECUTIVE SUMMARY

I am the CEO of one of Australia's longest-operating Registered Training Organisations and a Registered Migration Agent. However, I no longer assist prospective immigrants with their visa needs.

I hold a couple of bachelor's degrees, one in education and one a bachelor of arts. Furthermore, I have four masters, three in education and an MBA. Since 2010, I have been trying to complete a professional doctorate in education at La Trobe University. I have been in and out of Australian universities for 60 years.

The three principal areas that concerned me, amongst many others both as a researcher and educator, were:

1. All universities must agree to a code of conduct that protects the university staff and students from abuse of power and exploitation of students, with severe penalties for any breaches.
2. Students need to be protected from arbitrary decisions made by the universities. The appointment of an external university ombudsman is essential, and all universities agree to mandatory reports of any breaches.
3. All universities, TAFEs and RTOs are to be held responsible for the actions of their overseas agents.

## **A Code of Conduct that all Australian universities must adhere to**

Simply put, big business cannot be trusted to behave legally and ethically. My personal experiences have convinced me that despite my insignificant resources, the treatment of myself and my research was breathtaking.

When I confronted my university about ignoring university policy, they excused themselves by saying they were now following 'good practice'. University policies say otherwise, but it appears that university policies are for the students to follow, not to protect their interests; academic staff and administrators have full rein to do what they think is good for the University.

Dr. Kim Sawyer's Submission to the Accord made many excellent observations, including that:

The corporate University has subordinated students and subordinated the freedom of ideas. Students are the stakeholders disenfranchised by corporate universities. Students must be allowed to become stakeholders with voting rights. We need to resurrect the role of the student.

All academic staff are expected to follow what is good for the University, an essential part of their contract. The University comes first, above everything else.

While reading through some of the submissions written for the Accord, I was struck by how few were concerned with the most important stakeholder – the student. In 1961, I entered Monash University and participated in the anti-Vietnam and anti-Apartheid movements. I joined the 7<sup>th</sup> Student Representative Council and was on first-name terms with the professors. I learnt a lot. Even today, I fondly remember those days and recall concepts and arguments sixty years later. Attending University today is just a drag—a means to an end. Just attend lectures, if available, though most classes are online Zoom classes delivered by underpaid and overworked non-contracted research staff who are at the doorstep of their academic career.

In his Submission to the Accord, Dr. Kim Sawyer (Sawyer et al., 2007) accurately pointed out that:

When universities became corporations, attributes of the old University were subordinated. Universities began to behave like firms with no shareholders, operating with a declining government subsidy, and maximising sales in a market with excess demand. Student demand was paramount, and the determinants of demand became determinants of the University.

As I had observed, others also had similar experiences. Dr. Kim Sawyer commented that:

Deregulation exposed gaps in self-regulation that the government should re-regulate. Management and bureaucracy were the winners, students and young academics were the losers.

Students need to be protected from arbitrary decisions made by the universities. The appointment of an external university ombudsman is essential, and all universities agree to mandatory reports of any breaches.

I read the Submission by Dr Tim Thornton, who suggested that:

Given what has just been said, it is recommended that all universities in Australia should have the quality of student learning externally audited.

Australian universities are more interested in pursuing world rankings, prioritising research, and not focusing on student-centred learning. Furthermore, Dr. Tim Thornton suggested that these audits be made public.

As a research professional doctoral researcher, I wrote about an English language assessment test widely used worldwide: the IELTS English language assessment test. It is claimed to accurately measure a test taker's English language proficiency skills at a moment in time, despite the popularity of the IELTS test by universities and other IELTS test users. These test users included all Australian universities that use this test, together with the Department of Home Affairs, and most professional organisations also use this English language assessment test.

My doctoral research is titled 'An Exploratory Study of the IELTS English Language Test', and I observed that IDP, one of the IELTS test partners, put in a submission that made many claims that they cannot support with evidence-based research. Of the many, one of them includes the claim that:

The crucial tool that IDP contributes to the migration ecosystem is the International English Language Testing System (IELTS). IELTS has been a significant contributor to the success of the Australian government's migration program since 2001 when it was first introduced, to ensure that migrants be easily integrated into Australian society, language skills being paramount to achieving successful outcomes.

If their claim cannot be supported by evidence-based research, then it must follow that the Australian immigration system has been compromised. The use of the IELTS test has resulted in directly causing a skills shortage, something that I had warned about in my thesis. But no one is listening, as there are too many greedy stakeholders.

By way of some background, the IELTS test was initially created to measure candidates' English language proficiency skills for university admission (Davies, 2008) and a diagnostic function to determine if these applicants could handle English-based university instruction (IELTS, 2016a). If the international student had difficulty in any of the four Listening, Reading, Writing and Speaking skills, the University was to offer free remedial English language classes. These classes, over time, were no longer available to the students. In its place, the English for Academic Purposes (EAP) was introduced as a profit-making venture where most international students were channelled into completing a 10- or 20-week English for Academic Purposes (EAP) \$10,000 course that will guarantee the student entry into their course of choice.

Australian universities have long exploited international students with unproven English language assessment tests to maximise the opportunities to extract as much money in fees as possible. I have evidence that universities are accepting international students who have no hope of being able to follow university lectures as their English language proficiency skills are so low that they cannot even hold a basic conversation. I have met doctoral students who

presumably wrote a thesis and received a doctorate, though their English language proficiency skills were also low.

The Australian universities failed to advise prospective students of their conflict of interest with their ownership through the shareholding of one of the IELTS test partners, IDP: IELTS Australia. It was only until a few years ago that most Australian universities were shareholders of Education Australia and shareholders in IDP: IELTS Australia. I have more to say about the IELTS test later.

The vast proportion of students forced to complete the English for Academic Purposes (EAP) courses had non-English speaking backgrounds, which the IELTS test providers arbitrarily set. It is of minor consequence that countries such as Nigeria, Ghana, Kenya, and Singapore have the English language as their lingua franca. The unsaid distinction was that people from the IELTS-exempted countries of Canada, Ireland, the USA, Australia and New Zealand, those with English-speaking backgrounds, were predominantly made up of White Anglo-Saxons. The University and the immigration departments were using a race-based English language proficiency test, and one of the critical admission requirements was race-based.

From my currently censored research and by interrogating my database of 33,505 IELTS test scores, I concluded that less than three per cent could achieve the most frequently asked for test results of a minimum of Band 7.0 in each of the four IELTS macro skills of Listening, Reading, Writing and Speaking.

The Submission from IDP Australia also claimed that:

We are also a co-owner of IELTS – the International English Language Testing System – delivering the English language test that is trusted by more governments, universities, assessing authorities and organisations than any other, including Australia.

It should be noted that IDP mentioned that many organisations and countries trust their test. However, IDP provides no evidence that the IELTS test can fulfil the claims made in its promotional material. Somehow, these claims had grown from the initial admission by one of the test owners, the British Council wrote in 1995 (De Witt, 1995), and quite possibly in the original publication (De Witt, 1992) that:

The International English language Testing System (IELTS) is taken worldwide by students who intend to study in an English speaking country.

This claim was soon followed by a revised version (De Witt, 1995) that included an aspect of migration, 'or live', though there was no evidence that the test-design had English language testing for migration purposes, which then said:

The International English language Testing System (IELTS) is taken worldwide by students who intend to study or live in an English speaking country.

It would be interesting for IDP to reveal how an English language assessment test used as a diagnostic tool could be extrapolated for many uses while maintaining its test reliability and validity. I believe that they would be unable to do so.

Another submission to the Accord from the International Education Association of Australia supported my research by noting that:

For overseas students another challenge involved in addressing their employability and migration pathway expectations is to overcome the barriers put up by Australia's powerful industry accreditation bodies. These organisations often unilaterally determine levels of

English language, duration and number of required field placements and recognition for prior learning. In doing so, they all too often dishearten outstanding international student graduates from proceeding to gain professional recognition.

From my research, the International Education Association of Australia is correct in pointing out that the English language requirements are arbitrarily set and usually in concert with the laws of supply and demand. This phenomenon is unrelated to English language proficiency skills. Why do the different professional organisations have similar English language requirements, though other professionals have additional requirements? I will leave it to Alan Joyce of Qantas, who said that Qantas acted in line with 'practices around cancellations used across the industry'.

Krugman (2014) observed this type of defence: 'Everyone knows something must be true because everyone else says it is true', and Krugman (2014) referred to it as 'Zombie thinking'. Similarly, IDP Australia encourages professional organisations to set a minimum of Band 7.0 in each of the four IELTS macro skills of Listening, Reading, Writing and Speaking, in the knowledge that few people can achieve such results.

The International Education Association of Australia advises that such restrictions contribute to the skills shortage. The International Education Association of Australia also included a more worrying observation that the Accord should take note of:

It is small wonder then that many overseas students are choosing to move to countries such as Canada where their hard won qualifications are better recognised.

Earlier, I referred to the unacceptable behaviour of large corporations who manage to evade the displeasure of the public and regulatory authorities by breaching consumer law or acting unconscionably. The observation by the International Education Association of Australia that international students are now travelling to Canada should be taken seriously, and the self-delusion by Australian universities must stop. For example, about one million Indian people are living in Australia. One million supporters of Australian education to their relatives or one million detractors who tell their relatives to go to Australia where they will not be subjected to a race-based English language assessment test, forced to attend an expensive 20-week English for Academic Purposes (EAP) course, with subsequent loss of income, that is the opportunity cost of not working while studying, and then to later apply for professional registration which requests that the IELTS test is completed again before they can be admitted, without knowing that they have less than a tree per cent chance of passing. It is well understood that English language assessment tests discriminate against people of colour. Yet, we, as Australians, with our shameful racist policies, continue with the White Australia Policy, though in secret.

Such a revelation would be a scandal once revealed, and opportunities such as contributing to the Accord allow many submission contributors to have their voices permanently heard.

The reality that Australian universities should understand is that Australia is not the first country of choice for higher education for Indian students. Indian students prefer the USA and the UK, followed by Canada, then Australia and last place, New Zealand. For me, saying to prospective Indian students and their families that Australian universities test them for their English language proficiency skills using a test that discriminates against people of colour is something that Australian universities should be ashamed of.

Today, fewer and fewer Australian VCE students wish to go to a university and commit themselves to high debts with few prospects for decent-paying employment. It is more rewarding to complete free online courses in IT and then quickly get a decent-paying job. I believe that Australian universities will become obsolete. When my grandson graduated with his VCE class, it was interesting to discover that few wanted to attend University. One wanted to be a footballer, and I thought how ridiculous that would be, but one of them happened to be Harry Sheezel, who was awarded the AFL Rising Star award. For Harry's cohort, universities are not attractive for VCE students today.

The submission by Emeritus Professor of Medicine David Shearman echoed what I also believed, that despite the good intentions behind the Discussion Paper and the Interim Report, it fails to look to the future, and all the universities are interested in protecting their territory and highly-paid administrators. I wonder what young people think about the suffocating environmental issues, skills shortages, economic problems, etc. Then, one reads the submissions by some universities, and they do not discuss important issues; it's usually cliches of promises for the future. It is not about knowledge or discovery. It is about needing more funding for more buildings and administrative staff to support the many meetings staff have to attend.

Once again, I agree with Emeritus David Shearman that:

The discussion paper leaves me with the worry that it displays a sense of unity in relation to future needs. Perhaps the woes of the Universities are so many and so consuming that they overwhelm other vital considerations. Only section 2.4 provides some semblance of the changes that will necessitate further consideration of university reforms.

Furthermore, Emeritus David Shearman continued:

Perhaps these woes reflect that Universities have gradually withdrawn from discourse with the community and their administrations have failed to foster this discourse perhaps related to their adoption of corporatist values....

However, I commend Minister Jason Clare for his efforts to bring Australian universities out of the nineteenth century, but when the staff are contractually gagged and face dismissal for not supporting their University's proper tunes, where will the change begin? For example, La Trobe University includes in their contract to many of the staff that they are to spend a three-year probationary period. Some metrics include being a good team member and 'not upsetting the other' ([Probation \(Academic Staff\) Policy - for staff who commenced on or after 1 July 2023 / Document / La Trobe Policy Library](#)). How can this be reconciled with the principles of mandatory reporting?

The Alan Joyce Affair is gripping in its insanity and over-the-top logic, and now the Australian Competition and Consumer Commission (ACCC) has been forced to act. Similarly, the universities will only change when they are facing criminal sanctions. For example, their partial ownership of the IELTS test and the subsequent forcing of students with non-English speaking backgrounds to read this as students of colour to extract an extra \$10,000 on top of the fees is incomprehensible. Not only do they bring their organisations into disrepute, but Australia and all Australians will once again earn the distinction as a racist nation. I wonder what the Department of Foreign Affairs has to say about this.

Minister Jason Clare should be aware of the background to the IELTS test. The IELTS test is focused on people of colour, not that Australian universities, the Department of Home Affairs,

and most professional organisations were bothered by these acts of racial discrimination. As Australians, we know what is good for these people, like what our British colonialists knew. Racism runs deep in Australian history, and if everyone forgot that it discriminated against people of colour, the Department of Home Affairs did not. Once again, the IELTS test proved the 'go-to' remedy to ensure that limited numbers of qualified people of colour are to be considered for immigration.



**All universities, TAFEs and RTOs are to be responsible for the actions of their overseas agents.**

I cannot imagine how these three organisations could work together after being employed in the university, TAFE and VET environments. VET trainers care about their students, whereas the students are treated impersonally by university academic staff. TAFE institutes fall between the universities and the VET training colleges. As Alan Joyce would say, universities and the VET systems would not be a 'match fit'.

While gathering the information for the Australian Universities Accord, several outbreaks of anti-Registered Training Organisation (RTO) activities occurred. Together with these outbreaks are instances of false news being distributed. For example, the submission by the Australian Education Union Federal Office claimed that:

Seismic changes have occurred in the way that vocational education is resourced and delivered in Australia over the last decade and a half. There are now over 4,600 active registered training providers, but only 96 of these providers have more than 100 full-time students. It is plainly evident that quality cannot possibly be maintained at a system level when that system is populated by thousands of tiny individual private providers, some of whom have participated in recruitment and enrolment practices that can best be described as skirting the edge of legality.

I reject the claim that only '96 of these providers have more than 100 full time students' and that many are 'skirting the edge of legality' is a rather defamatory statement.

Let us assume, for the moment, that if what the Australian Education Union Federal Office is quoting is correct, then it is not a problem of the vet but that of the Australian Skills Quality Authority (ASQA), which oversees the industry. I can suggest that some RTOs may be, for example, music schools that have 20 students. Does that make them 'skirting the edge of legality'?

A week ago, the media was flooded with 'ghost colleges'. A variation of the claim by the Australian Education Union Federal Office of RTOs 'skirting the edge of legality' and no evidence is provided.

Few of us would have missed the sudden appearances of newspaper articles on the VET sector and television of 'ghost colleges' (Dodd, 2023; Groch, 2023a, 2023b, 2023c; Lucas, 2023b, 2023c; Sun-Herald political correspondent, 2023; Visentin, 2023a, 2023b, 2023c). The journalist measured attendance at these colleges on the amount of foot traffic, not classroom attendance. I have no idea the answer, but I can speak for myself as I have not been at La Trobe University since October 2019. Does that make them 'ghost universities'?

However, as a researcher, I decided to conduct a similar non-scientific statistical analysis with no Ethics Department approval. I analysed the situation at Monash University at Caulfield, Victoria, conveniently triangularly sandwiched between the Caulfield Racecourse and eight monolithic apartment complexes that may house between 1000-6000 students, mainly international students. I observed 651 in the well-attended and impressive library, 45 in the quadrangle, 22 lining up to obtain free lunches, and three at the Monash Student Union. If I wanted to be critical of Monash University, I would go for the three attendees, but I have a soft spot for that University, buoyed by my three graduations with them. So, to be fair to Monash University, I will go for the 651 students, though they were comprised of about 80 per cent 'Asian', and I failed to check their place of birth. Probably 60 per cent were born in

Australia or are permanent residents, but in the spirit of sensational reporting, let us say that they are all international students, and just 20 per cent were local students. However, this figure may again be suspect based on 'Whiteness'. But the sensational element is there and worthy of media interest. But useless for the high standard expected on a submission to the Accord.

The submission by the Australia Industry Group also followed a similar pattern of bashing the RTOs instead of discussing the responsibilities of the Australian Skills Quality Authority (ASQA) by claiming that:

We acknowledge that the need for a compliance-based approach in VET is far greater, given the sheer number of providers, the low barriers to entry and the proven record of poor provider behaviour. However, VET also needs a model which incentivises continual improvement and best practice, and allows greater autonomy for those with a proven track record. There is also an argument that the regulatory system in VET could provide better market signals regarding provider quality.

I acknowledge the universities' animosity toward the RTO sector because they claim that the RTOs poach their students and abuse the Australian visa system. If the universities had their way, all international students should be enrolled at their universities, paying high fees to maintain the high salaries that the university administrators earn.

Using Indian students as an example, it is true that many Indian students come to Australia on pre-approved student visas. Then, before the due date for paying the university fees, they are encouraged to switch their studies to vocational occupations. The universities and their agents do not want the true story revealed: their overseas agents exploit international students (Lucas, 2023a).

However, in recent days, the universities have successfully stopped transferring international students from the university to the VET sector. Although there has been a call to streamline the integrity of the Student visa and Australian education systems, only the VET Sector and onshore education are unfairly targeted. What has not been revealed is that the universities are to be blamed for this situation occurring in the first place, and the effect of this will be a reduction in the number of Indian students coming to Australia and an increase in the number of suicides of Indian international students. Suicide of international students is a topic that is not widely discussed, with around 30 per year. Only in 2012 was I able to obtain the numbers for that year from the immigration department. In later years, my Freedom of Information (FOI) requests were denied.

Monash University uses an Indian student recruitment agency called Global Reach, which has 35 offices throughout the Indian subcontinent, including India, Assam, Sri Lanka, Bhutan, Bangladesh, and Nepal. Global Reach claims to have 5000+ counsellors ([Case Study: Global Reach and Career Counselling - GCC Course \(globalcareercounsellor.com\)](#)) and claim that:

Global Reach, since its inception 28 years ago, has been instrumental in placing more than 20000 students in different reputed foreign institutions along with counselling at least 100000 students.

Furthermore, Monash University uses other overseas agents such as IDP with '190 offices. IDP Education Limited is an international education organisation offering student placement in Australia, New Zealand, the USA, the UK, the Republic of Ireland and Canada. IDP has over 190 offices in 35 countries and 2,200 counsellors' ([Find an Education Agent - International](#)

[students - University of South Australia \(unisa.edu.au\)](http://unisa.edu.au)). Up to recently, all the Australian universities were shareholders in Education Australia that owned half of IDP.

To understand the role of overseas agents in marketing university places and continuing to use India as a source country, Australian universities usually have the following overseas recruitment channels for international students:

1. IDP (one of the biggest recruiting and ASX-listed companies)
2. Members of organisations like AAERI (Association of Australian Education Representatives in India)
3. Direct recruitment from High profile and expensive schools
4. Own marketing and recruitment office in India

Using the Indian market as an example, the universities use only a few hundred agents in India, with a population of more than a billion citizens. The universities use these registered agents to enrol students from India in big cities. Since they cannot cater to the whole of India, they have their subagents in different cities, which are tier-2 cities in India. Then, these subagents have their subagents in tier-3 cities, and this chain continues to the village level.

When the student approaches these subagents, their application is then forwarded to the agent above them until it reaches the registered agent of the university, who then looks into the student's application along with the paperwork that has been submitted. Problems regarding forged documents, for example, occur at the subagent level since the subagent knows the requirements of the universities. When the student goes to these subagents, the student is asked to submit the required paperwork along with the financials for the student visa. The students who cannot afford the different fees are then sold a package, where a student is asked to pay between \$30-\$40,000 once the visa is granted, and this money includes student fees for six months in most cases. The student's family will take a loan or sell their land to pay this money, and therefore, once the student is here, the international student wants to change the course as they cannot afford the university fees.

Where the process is flawed is that the students, when offshore, are instructed that they should enrol in this university and do this or that course, and often, the student has no idea what is happening as the agent or subagent reassures the student that all is going well. When the Indian student arrives in Australia and are asked why they are enrolled in a particular course, I am told that their offshore agent told them to study this course, and they were misguided by that offshore agent.

The University is required to pay a commission varying from 15 to 20 per cent to the above network for student recruitment. Therefore, these organisations are strongly motivated to counsel all prospective students for admission into the courses offered by the University, irrespective of whether the student is fit to undertake the course of study or financially capable of paying all the fees. The commission payable to these offshore entities is paid overseas and beyond the reach of the Australian Tax Office. The Australian economy does not fully benefit from the international student fees, even though most agents are Australian Citizens. They reside overseas and spend most of their time lobbying the Australian government to increase profitability. If it sounds like the lobbying behaviour of Qantas in Canberra, it is.

The Australian universities are happy to accept student applications and pay the commissions, and obviously, the universities do not check incoming applications. Students realise that something is amiss when arriving in Australia and find that the course they were enrolled in is inappropriate for them. Now, with the changes in the visa rules, they are stuck with the course chosen for them and have no hope of passing. Their student visa is at risk, and they are saddled with huge debts. Who will take responsibility for this mess? The Indian agents, the Australian government, the universities?

If the Australian Competition and Consumer Commission (ACCC) has some spare time after fixing up Qantas, they should look into this visa racket. From my understanding, all of these agents have student counsellors working for them who are paid a commission for every student who successfully obtains the visa. Most of these student counsellors are young graduates without an understanding of the Australian education system. Their only motive is to enrol the student in a course where the chances of getting the visa are high, and they can get their commission.

The international student market is also motivated by the eventual pathway to permanent residency pathway, which this federal government correctly recognised. It is not unusual to find many international students who have completed one or two Master's degrees and are now meeting VET diplomas as it is easier for them to obtain a vocational career with a VET qualification together with the relevant experience than remain unemployed with their Master's qualification. Since Australia wants qualified persons with vocational qualifications to alleviate the skills shortage, they have a wider choice of careers, as listed on the MODL (Priority Migration Skilled Occupation List) occupation list.

Because of the previous government's failed policies, the Department of Home Affairs refusal rate of the VET sector for the past ten years is close to 90 per cent, if not higher. The same student applying to study in VET will have the visa refused, but if the student applies for the same course at a much higher cost, the visa will be immediately auto-approved. It is immaterial if the student is unwilling or incapable of finishing the course. Furthermore, with selfish counselling for their commissions, the overseas agents are the single reason for the issues around concurrent COEs and students opting to change providers after six months. This pathway is very attractive for overseas agents as few visas are granted offshore for the VET sector, and many more are given for study in higher education.

Before 2009, it was impossible to obtain student visas if the overseas agents had improperly assessed the prospective student, and these students would not have been able to enrol in the wrong University courses from day one. The situation since 2009 is to allow such bad behaviour, which has proved disastrous for the international students.

While there is a shortage of skilled people in Trades (as evident from the list of occupations on Skilled Occupation of Lists) with relevant courses offered by the VET system, students are recruited on university courses such as the Bachelor of Business with no future pathways in Australia. The social and emotional implications of this unhappy situation are that parents are selling their properties to enrol in the wrong courses offered by the universities so that a student visa can be secured. The whispers circulating throughout Australia's Indian community are that some of these students are almost on the verge of committing suicide after the recent knee-jerk reactions by the Australian government.

Dr. Tim Thornton, in his Submission, wrote that:

Inappropriate candidature can also be stressful on overseas students that do want to learn but don't have the English language skills or pre-requisite knowledge and skills to cope. Universities can be quite venal in their pursuit of the international student dollar and can care little about the students themselves and have quite low standards of candidature in order to maximise income. Also, there is so much money involved in international enrolment governments have often turned a blind eye.

Ultimately, we have to decide as a society whether we want to run a system that has academic and ethical integrity or simply one where everyone pretends that we do.

I suggest that the Government should have a holistic approach to the Australian Student Visa system that:

1. All Australian Universities are investigated on the total value of commissions paid to offshore Agents and offshore bank accounts.
2. An equal number of Visas are granted for both VET and Higher Education per students' choice.
3. Change of provider after six months of study as is currently under the ESOS Act.

The Australian universities are only interested in protecting the agents' commissions; ultimately, these exploited international students are forced to pay exorbitant fees and commissions. From the perspective of Australian universities, they only see international students as cash cows (Burton-Bradley, 2018; Qureshi & Khawaja, 2021; Robertson, 2011; Worthington, 2019)

In another submission, Dr Tim Thornton advised that;

In my experience, abuses of power and process regularly occur within the system. A university ombudsman is often impaired by the fact they are an employee of the University that they are charged with monitoring. Their lack of genuine independence regularly compromises their capacity to be impartial and to speak truth to power.

Furthermore, Dr Tim Thornton, in his submission, observed that:

I often found when various actors within a university were engaged in, or aware of, something that I thought was deeply wrong or irregular, they would refuse to communicate in writing. At best you would get some mealy mouthed and evasive verbal response.

Through greed and an indifferent attitude to their student base, Australian universities are on a path to self-destruction, together with graduating secondary students who prefer to bypass university education and pursue other career options that have surfaced as part of the gig economy. Herrmann et al. (2023) summed it up in their title, 'We do not need no (higher) education' - How the gig economy challenges the education-income paradigm'.

Moore (2023) examined the current situation and pointed out that this situation is a worldwide problem that:

Vice-chancellor salaries are just one of a host of governance issues now besetting Australian universities. Many of these have begun to receive coverage in the press – underpayment of staff, profligate spending on consultants, increasingly degraded learning experiences for students, inadequate transparency and accountability. There are different factors behind these developments. Increasingly, critics are pointing to a major structural change that has occurred in Australian universities over the past 30 years. This has been the

unprecedented shift of power and resources in institutions away from traditional faculties to central administrations.

I am delighted that other submission writers also remembered the importance of focussing on the student's education. For example, Dr. Kim Sawyer's Submission to the Accord mentioned that:

In 1904 Einstein wrote four miraculous papers including the paper on special relativity theory. Einstein wrote the papers on a table in a Berne apartment, without a network, without journals. Einstein did not need the structure of a university, but Einstein did need the freedom to think. Newton, Leibniz, Turing, and Simmel were the same. Freedom is the underwriter of innovation.

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