



AUSTRALIAN STRATEGY FOR INTERNATIONAL EDUCATION 2021 – 2030

TAFE NSW RESPONSE

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AUSTRALIAN STRATEGY FOR INTERNATIONAL EDUCATION 2021 – 2030 – CONSULTATION

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

Australia has to enhance current practices to strengthen its proposition and attractiveness as a study destination. It is critical to establish a roadmap for student return and manage this process in a safe and responsible manner. Other nations have progressed with updating visa approvals and processing, post study rights and permanent residency opportunities, as well as expanding their skills lists, which positions them as destinations of choice for student's when selecting to study overseas.

- Development of a nationally centralised and federally managed Education Agent certification process. This would set central standards for registration, monitoring, accreditation and quality control. The current approach of the agent code requires evolved to set certification and monitoring procedures for managing agents and would build on the existing <https://eatc.com/> platform.
- Increased co-ordination between Commonwealth and State agencies & education providers to enable a consistent and integrated approach to students with regards to standard international student services such as pre-arrival, arrivals, orientation, accommodation, employment etc.
- Increased co-ordination between Commonwealth systems, Immigration and education providers to strengthen compliance with student visa conditions and reporting requirements under Education Services for Overseas Students (ESOS).
- Increase flexibility of delivery requirements under ESOS in light of digital and online learning. (E.g. Recognition of offshore learning contributing to post study work rights).
- Investment increased into regional scholarships to boost enrolments into non-metro areas.
- Introduce a provision whereby it is compulsory for students to apply for a new visa when changing institutions while onshore to remove impact of provider changes and transfer risk to a new provider.

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?

- A centralised and consistent introduction to Australia with standardised core information needs adopted. This approach will ensure every student receives the same details prior to arrival in Australia, creating a consistent experience and standards.
- Enhanced experiences for students to prepare them for arrival in Australia through pre-approval/pre-departure engagement and cultural immersion events to support them with transitioning to study in Australia.

- Australia needs to address market feedback that students focus on employment outcomes and the applied approach towards training and education. This will provide assurance that programs will set them up for success with career aspirations.

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

- Improve the student visa program through changes to student visa requirements and allowances, as well as improving visa processing to be more globally competitive and attractive. (details outlined below)

Visa policy settings

- Accelerated visa processing following Canada / UK models that fast-track study approval.
- Provision for overseas students to work 50 hours a fortnight while studying to provide greater earning potential.
- Update post study work rights to be more globally competitive and make Australia more attractive as a study destination including:
 - 3 years post-study visa rights provided for students who study 2 years or more in Australian Qualifications Framework (AQF) programs of Certificate or above.
 - 2 years of post-study visa rights provided for students who study 1 year in an AQF program of Diploma or above.
- Align 2 years post study for 1 year Postgraduate programs e.g. 1 year Masters.
- Streamlined residency paths for STEM subjects, regional study, skills listed courses, which Canada has adopted to increase enrolments.
- Expansion of the skills list to increase international student enrolments with a wider array of recognised qualifications. Focus on VET assessed programs to diversify from the current approach of Higher Education degree or VET trades.
- Recognition of online offshore study contributing towards post study work rights, which are currently only recognised due to the COVID-19 pandemic. This is recognised by Canada for students offshore.

Regulatory settings

- Review current Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) delivery restrictions on VET delivery. (e.g. 20 hours Face to Face to accommodate alternative delivery mechanisms and adapting requirements to enable apprenticeship trade courses to be delivered to international students).
- The current restrictions and definition of full-time load have been in place for over 20 years. They are unique to the VET sector and do not apply to Higher Education, though both sectors enrol post-secondary students who are mostly over 18. The restriction on VET should be reviewed to align with Higher Education CRICOS requirements.
- VET training content and methodology has changed considerably over this time. There are VET qualifications of interest to international students that do not require 20 hours per week delivery. These qualifications are excluded by the 20 hour rule. Delivery methods have changed to utilise recent educational technology. The CRICOS requirements for VET should be reviewed to align with these changes.
- Pricing of VET qualifications: there is considerable discrepancy between providers' VET prices for international students. The discrepancy is especially high between Government and non-

Government providers. This is the major driver of the high leakage of students to lower priced providers. Consideration should be given to set minimum prices for VET qualifications, as is the case for Higher Education. The minimum price could be based on the current State based cost of qualification systems (Smart & Skilled in NSW). The minimum should include costing of additional support services for international students. This will minimise student transfers based on price alone and also ensure that students receive services mandated by the National Code.

- Mandate credit for Diploma & Advanced Diploma to university degrees, as recommended under AQF.

3.1 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?

- Develop mechanisms and policies to support the expansion of Transnational Education (Offshore) through Face to Face and online delivery modes in the VET sector. This includes designing a more adaptive and flexible approach towards how locally engaged offshore VET teachers vocational competency and industry currency is assessed (recognising there are fundamental differences within the education and training sectors between countries).

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

- Increase the recognition of short courses and micro-credentials within offshore markets through the government agencies and a centralised campaign with educational stakeholders.
- Allow the diversification of the type of study international students choose through the equal promotion of sectors offshore and through equitable visa processing and grants. This would drive an increase in the share of VET international students as compared to Higher Education students.
- A major cause of the Higher Education dominance (which impacts diversification) is the perception that student visas grants are easier for Higher Education. This is in fact the case, as shown in Department of Home Affairs (DoHA) visa data.
- Review the assessment of Vocational visa requests, which have a higher rejection rate. This impacts international recruitment and has created a negative perception among agents/students. The sector requires support to improve this issue and a revision of visa approval is required.
- Increased VET enrolments aligns with priority given to VET in major source countries where vocational education is being given higher priority within their education systems and educational development.
- Renew regional scholarships to boost enrolments into non-metro areas through the continued investment in the Destination Australia scheme. The Destination Australia model should be reviewed through consultation with participating providers as the current model has limitations.

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

The changing environment will require greater capabilities around medical and care, big data, virtual hardware and software, digital protection (cyber), engineering and trade skills. These areas will continue to grow and skills shortages remain an issue for many international countries.

Skills requirements list:

- Digital and Soft Skills.
- Software and Hardware with capabilities inclusive of virtual knowledge.
- Career and Job Ready Employability skills – job applications, interviews etc.
- Engineering (Mechanical, Electrical, Civil, Structural).
- Trade capabilities (including: Building & Construction, Carpentry, Vehicle Repair).
- Medical & Care (Nursing, Child and Aged Care).

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

The identification of skills requires input from future skills experts to profile and define employable graduates and ensure placements or academic teaching aligns to industry requirements.

- Work placement skills that prepare students with hand-on experience will ensure they are ready for entering the global labour market.
- Through a set work placement plan for key careers this will set a benchmark standard for students who require additional practical skills.

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

A distinctive approach to education built on the quality and expertise of Australian institutions combined with strong educational outcomes.

Stronger value proposition:

- Quality and cost-effective practical education.
- Reliable government sponsored providers.
- Largely domestic student cohort to diversify the class.
- Work placement internships.
- TAFE NSW - Institutes of Applied Technology - focus on technical qualifications with practical component.
- Trades skills - where applicable.
- Seamless pathways from VET to Higher Education.

6.1 What is our value proposition for both international and domestic students?

- Strong academic foundations and an internationally recognised education structure preparing graduates for their future careers. Australia offers a cultural immersive experience in world class educational institutions.
- Further development is required to build the brand and positioning of Australia as an international education destination. Inclusive promotion, which in a holistic approach, nationally, is required to highlight the breadth of providers and studies available.

6.2 How do we offer an Australian education experience while complementing the value of Australian offshore and online education?

- Online, offshore or virtual learning has to embrace the values and teaching standards students’ receive while in Australia. The curriculum and studies have to simulate the experience a student receives while in a class in Australia, replicating that immersive delivery.

7. Community support for the international education sector is important for the sector’s social licence. How can the benefits this sector provides to Australia be better understood by wider community?

- International Education needs a “sales strategy” to the Australian community in light of COVID19, with some relatable examples of “success stories” and benefits to Australia. (Potentially refer to Colombo Plan and two-way movement of “students” providing global value. Relatable or Famous Alumni, not just university or “celebrity” but something ground breaking for Australians e.g. health & technology).
- The international education sector is important to Australia and Australians:
 - It is the 3rd / 4th (depending on COVID-19 impacts) largest export behind iron ore, coal and gas (Mining).
 - In 2019-20 it was worth approximately \$37.5 Billion to the Australian Economy.

- Benefits are social, cultural and economic:

Social – contribution to multiculturalism and globalisation of Australia and its population

Cultural – provides cross cultural opportunities for Australian students and academics, collaboration.

Increases Australian students’ cultural awareness and provides international opportunities for careers.

Economic – provides employment for 95,000 in NSW alone, (funding for universities) opportunities to develop excellent international relations, directly linked to other important industries such as Hospitality, Tourism, and other services, export opportunities and foreign investment.

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

- Providing a timeframe for the return of international students, even if very estimative, as there is evidence of growing amounts of prospective students abandoning the idea of studying in Australia and go to destinations perceived as more welcoming, such as Canada, the UK and New Zealand.

- Protecting the sector that contributes to the Australian economy and raises the countries profile on the international stage through quality research and development that has global impact.

9. Do you have any additional comments or feedback to share?

- **Strategies used by international students to get released prior to the minimum 6 months at the primary provider.**

International students use a variety of ways to transfer providers in the first 6 months of study. The current system is very slow at taking action against students who are failing their courses or breaching their visas - even for international students who have their visas revoked. It can take months or more to be required to leave the country as the appeal itself takes 12 months to be processed. Students often have enough time to finish their course with the provider they transferred to onshore after failing with their initial provider before any action is taken against them. It is recommended that existing loopholes are closed and the current rules are tightened to limit students` transfers prior to the first months onshore. If a student has to complete 12 months of study before a student can move provider it offers providers greater protection with the costs associated of recruiting and on-boarding.

- **The need to close policy loopholes and tighten rules in areas used by international students to go around the 6 month transfer requirement.**

There is a number of ways in which international students can go around the 6 months of minimum stay with the provider who has recruited them offshore, including:

Concurrent Certificate of Enrolments (CoE): the concurrent CoE option on PRISMS allows international students to get additional CoEs without a letter of release from the primary provider and to transfer between providers in less than 6 months from arriving onshore. It is recommended to close the concurrent CoE loophole.

- **A better regulation of providers is needed.** It is recommended that the regulator takes more proactive action against providers leveraging policies to recruit and enrol students. Current punitive measures are not enough of a disincentive to providers, with provider closures taking years and some providers anecdotally reopening under a different name despite having been closed for regulatory breaches previously. A forum for raising these concerns with government educational agencies, with timelines for responses, would enable providers to work more closely to address issues.
- **Issue with ELICOS students and English language requirements:** Lower priced providers often coerce ELICOS students from TAFEs. Even if they don` t get a letter of release, they can use their low levels of English as a way to be let go and enrol with another provider. Providers use “equivalency” to accept English levels but there is no official definition of it and each provider has their own way to determine their equivalency: some institutions for example use ELICOS course duration or interviews rather than the student`s English scores. It is recommended that the system specifies ways in which international students are deemed to have met the English levels when starting a course, for example by requiring students to take a formal English test.

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