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APC Education Group (AEG) DESE Consultation Paper Response

APC Education Group (AEG) is very pleased to be able to contribute to the Department of Education Skills, and Employment (DESE) on the consultation paper 'Connected, Creative, Caring: Australian Strategy for International Education 2021-2030'.

AEG is one of the oldest and largest private education providers in Australia, helping over 10,000 international students annually across our 12 campuses that are located in NSW, VIC and QLD and employing over 400 education professionals, since 1993. We welcome the opportunity to provide a response to this very crucial and timely document that will allow Australia to leverage from its deep experience as an international education destination and consider its leadership position with the opportunities ahead of us.

Discussion Questions:

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

a. Become the destination of choice for globally mobile and digitally literate global citizens

Many modern learners are no longer limited by access to markets (destinations), funds or basic language, literacy and numeracy. At no other time in the history of the world have we had such an educated population who are now seeking more opportunities who have access to digital resources in their "hands" to study anywhere, anytime.

b. Lead global innovation in curriculum and pedagogy for digital learning experiences that are delivered in English with a robust but responsive regulatory framework that allows quality providers to respond to learner needs

Remove regulatory and administrative barriers that limit innovation of the "science of education", but at the same time ensure the integrity of Australia's border security by working with commerce and industry groups for an industry-led assurance framework, not a compliance-led assurance framework.

c. Recognise that migration, employment and further academic pursuits are all equally legitimate educational outcomes from a pedagogical perspective for aspirational global citizens (just like any other learner, including domestic students)

Confront the negative misconceptions of the nexus of migration and international education by driving the narrative that an international education strategy is necessarily a migration outcome; just the same as an international tourism campaign is one where an increase in temporary migration is a necessary outcome.

Recommendations:

1. Government to continue to collaborate with industry and broaden to diversify consultation and membership with independent providers, edutech companies, education agents and with industry peak bodies that represent the international education professional, such as the NEAS.
2. Review the regulatory framework to allow flexibility of delivery to ensure it is centred around educational outcomes of individual learners first and foremost, and not the regulatory and compliance requirements.
3. Reinvigorate and renew the focus of any “brand Australia” campaign such as “Future Unlimited”, to also message and communicate to the local community (not just prospective international students) and change the misconceptions around international education and students being a “threat” to permanent resident opportunities.

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. **Providers working within a regulatory framework that is industry-led and assured, but supported by the government; and not government-led**
- b. **Promote customisation of learner experiences prioritising student outcomes instead of just meeting visa requirements by removing 20-scheduled contact hours for international students**

Recommendations:

1. The Government to actively promote, engage and recognise that education professionals (teachers, trainers and support staff) are key stakeholders in a student-centred strategy in an industry-led framework
2. Allow providers and education professionals to determine the best engagement strategies to customise learner experience by removing the need for 20-scheduled contact hours and restrictions on delivery mode

3. What changes are needed to make Australia more globally competitive over the next decade?**a. Micro-credentials focusing on specific skill sets nested with larger qualifications**

Long, theoretical higher education programs do not serve the needs of the modern globally-mobile student or workforce and a shift to allowing international students to have access to a diverse range of learning products and services from different providers is key to innovation and for Australia to remain competitive as a destination of choice.

Recommendations:

1. Allow packaging of various micro-credentials to be part of a larger qualification as mapped by a qualified provider for student visa holders



2. Allowing non-HEP students to access post-study work rights, including approved micro-credentials that pathway to formal qualifications

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

- a. **Provide access to more diverse higher education programs by removing barriers to entry for committed professionals and low risk providers**

Cost and time to become a Higher Education Provider is so prohibitive that it has deterred many committed educators to seek solutions and partnerships outside of Australia, instead of investing in Australia.

- b. **Data protocols for greater sharing and harmonisation of international student life-cycle data**

The US and the European Union are both working towards the same goal with the General Data Protection Regulation (GDPR) and Australia will inevitably follow their lead in a global marketplace for customers/clients/students.

Australian international education needs a strong strategy on how we will respond and stay agile by developing a clear strategy of data harmonisation, portability and security protocols, but that still allows for fast and reliable transfer and sharing of data across industry and government. This will aid operational efficiencies and allow Australia to remain globally competitive in areas of licencing (provider and courses), processing applications, funding, issuing visas and monitoring the integrity of our border security policies.

Recommendations:

1. Fast-track Higher Education Provider applications for low risk providers with demonstrated professional records and standards
2. Have a single regulatory oversight body (current TEQSA and ASQA) so that any provider meeting "AQF course requirements" can have the courses registered no matter if they are a HEP or RTO.
3. Government to fund a round-table or working group with industry-led assurance bodies such as NEAS to determine data protocols/standards specific to international education, but aligned with international and national standards such as GDPR.

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

- a. **Language literacy with English as the main language for intercultural interactions**
- b. **Digital literacy**
- c. **Emotional literacy including intercultural understanding**
- d. **Entrepreneurship**
- e. **Decision making and problem solving**

Recommendations:

1. Government funding and support to ensure quality English language teaching and support through-out the whole student journey (not just at the beginning, but as an ongoing outcome even after their initial ELICOS program)
2. Government funding and support for an agency or industry agency (similar to Group Training Organisations) to place and assist international students for work experience and internships across various industries for customised learning around their area of interest

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

- a. **Our value proposition is lifestyle. Access to opportunities and a lifestyle that is uniquely Australian.**

The environment, language, landscape, academic, employment and future career opportunities all work together to form a unique Australian education experience.

Access to all of these lifestyle opportunities are all valid and none are mutually exclusive, as they are all an integral part of any learning experience for both domestic and international students.

We must change the narrative that a “genuine student” is one that has a “fixed” outcome and towards one that recognises the changing needs and aspirations of a global citizen with their learning outcomes dependent on their stage in life and their life circumstances.

- b. **Allow international students to study anywhere in the world as long as they complete a majority of their learning experience in Australia in any mode of learning.**

To be the destination of choice for international students, Australia must meet their modern lifestyles.

Australia has always been innovative in competing with other destinations by offering working rights for student visa holders. Restrictive visa requirements place major barriers in determining which destination to choose. By allowing international students on a student visa to study at various locations where Australian providers deliver education (outposts or twinning arrangements) or have industry partnerships outside of Australia will provide a great source of competitive advantage.

Recommendations:

1. Review the Genuine Temporary Entrant (GTE) requirements to ensure there is clear separation and distinction to allow for “genuine educational outcomes” that recognises the changing needs of a global citizen. Migration, employment and further study in the same field of studies are all genuine education outcomes.
2. Allow student visa holders to study anywhere and in any mode as long that they meet or belong to industry quality assurance bodies and study a majority of their program (>60%) in Australia.



3. Government funding and support for an agency or industry agency (similar to Group Training Organisations) to place and assist international students for work experience and internships across various industries for customised learning around their area of interest

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?

- a. **Recognise that migration, employment and further academic pursuits are all equally legitimate educational outcomes from a pedagogical perspective for aspirational global citizens (just like any other learner, including domestic students).**

Confront the negative misconceptions of the nexus of migration and international education by driving the narrative that an international education strategy is necessarily a migration outcome; just the same as an international tourism campaign is one where an increase in temporary migration is a necessary outcome.

Recommendation:

1. Create a "local" or domestic communication strategy to change the misconceptions around international education and students being a "threat" to permanent resident opportunities and that their only benefits are economic ones ("cash-cows")

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

- a. **Continue but broaden membership and engagement**

The CIE needs to continue its activities as it is a great platform and advocate for international education. The CIE and the Australian Government should broaden or review its membership to include industry professional associations that represent the teachers, trainers and support staff (eg. NEAS) and also to include education agents (International Students Education Agents Association - ISEAA).

Recommendations:

1. CIE to continue as a vital forum for international education strategy for Australia
2. CIE to review membership composition for greater diversity and representation of other important sectors of the international education community such as NEAS and ISEAA
3. CIE to review the term of members to promote collaboration and engagement with more stakeholders

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