

26 May 2021

**Department of Education, Skills and Employment**

Education-ies@dese.gov.au  
50 Marcus Clarke Street  
CANBERRA ACT 26001

To Whom It May Concern,

***Re: Connected, Creative, Caring: An Australian Strategy for International Education, Consultation Paper***

Thank you for the opportunity to respond to the *Connected, Creative Caring* consultation paper. We have below provided our thoughts to questions relevant to online education policy.

Online Education Services (OES) is an Australian owned and Melbourne based provider of over 100 quality online degree and post-graduate education programs to both internationally based and domestic Australian students.

Founded as a joint venture between global digital employment platform SEEK and Swinburne University of Technology, OES has been providing high quality online education services across the entire scope of services and value chain for 10 years. During this time, OES has developed a recognised world-leading academic management system which enables our students to conquer the largest traditional barrier to a high-quality education: access and distance.

We have delivered quality online education at scale (educating more than 40,000 students globally) without compromising quality (90 per cent overall student experience in the national Student Experience Survey for our largest partner). We possess the experience, infrastructure and workforce capability required to deliver a diverse online education program portfolio at scale.

We partner with four Australian universities – Monash University, Swinburne University, Western Sydney University and the Queensland University of Technology to prepare our students with the skills and qualifications to successfully embrace the future of work.

Our capabilities are uniquely enhanced by our majority owner SEEK, which provides us with access to a global jobseeker audience, powerful employment market insights and the value added by leveraging many of the employment and education aligned businesses within the Group.

Thank you again for the opportunity to participate in this process.

Yours sincerely,



Denice Pitt  
CEO

## Discussion questions

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

The COVID-19 pandemic has greatly shifted and accelerated the acceptance of online delivery of tertiary and higher education in many markets which have traditionally been important to Australia's international student sector. The next decade is going to see the increasing uncoupling of the traditional classroom lecturer/student co-location delivery model of higher education.

The key priority for the new international education strategy will be to recognise the growth in online education delivery and accept this global, long-term 'new normal' in higher education as a prevailing assumption for the new strategy. This will require selective policy changes.

OES, in partnership with SEEK, recently undertook primary research across several emerging markets to assess and clearly understand the market opportunity for and attitudes towards online-led delivery of Australian degree programs post-COVID. Research results indicated that 78 per cent of Chinese students and 81 per cent of Indian students are more likely to consider online learning in the future.

A further priority must be protecting our nation's market share and reputational position in an era of digital disintermediation, which threatens to disrupt the historical structure of education providers and traditional models of international education delivery.

We must also enact a long-term strategy to revitalise the digital and human infrastructure of the sector. Australia must ensure it has sufficient capacity to be able to deliver a range of emerging digitally driven education models to world-leading and academically rigorous quality standards to compete with other global providers in this context.

### 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?

Australia's capacity and emerging maturity in creating online education that is purpose built for a connected and engaging student experience using evidence based practices, positions us well to compete globally.

OES prides itself on its academic-led, student-centric approach to online learning, and the consistently high student experience scores we receive from our students. We are continually seeking to improve our exceptional student outcomes and grow the student learning experience through utilising innovative technologies.

We support our students through a range of high-quality services across the entire student lifecycle, including our award-winning virtual reality simulations, learning design and development capabilities, as well as the delivery of student support services.

OES provides a comprehensive range of inbound and outbound services – including small group online teaching, general academic guidance and technical, administrative and pastoral advice, targeted success coaching and career coaching. Additionally, we provide our students with multi-channel live support (email, telephone or live-chat), across extended hours seven days a week. By providing a highly connected, supported online student experience, we have been able to foster strong student engagement to their course and university.

We have also developed proprietary capabilities which enable us to engage students using personalised evidence-based interventions and campaigns to increase student success, retention and progression and use these data insights to refine and improve course delivery.

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

It is vital that universities are given greater regulatory flexibility to service international off-shore markets, and develop globally recognised online program specialties.

Whilst there will always be the concern amongst universities that opening up online offerings to off-shore international students could cannibalise their existing on-campus international student market, in reality, a portion of this market is likely to shift to online regardless. While the international on-campus segment will remain important, we need to be capturing part of this shift or risk losing it altogether.

Instead, this should be treated as a broader, long-term opportunity to position our sector to attract other international student segments who would not have had the funds to relocate to Australia. HolonIQ data suggests that there are 20 million students who want to study outside their home market but were unable to do so. In current circumstances this presents a significant opportunity to broaden and diversify our student markets away from their historical concentration in China and India.

**i. 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?**

Australia's international education policies currently preference in-person study over online study, particularly with respect to those seeking post-study employment and migration outcomes and opportunities in Australia. Currently CRICOS registration (required for courses that allow study or post-study employment visas) stipulates that two thirds of the course must be delivered face-to-face and that at most one non-distance/online unit is studied per study period.

This regulation was enacted in an era preceding the significant developments in online education delivery technology. If this regulation is retained in its current form, it may limit the growth of Australia's potential international student markets. It could also create a risk that a portion of Australia's future international on-campus student market will take up online offerings from other countries with a more favourable education-to-migration treatments, instead of on-campus study in Australia.

Already, Canada has loosened post graduate work permit eligibility requirements to recognise study completed online outside the country and several other countries are making similar moves. Whilst these changes are currently temporary in response to COVID, there is the possibility of them becoming permanent if the COVID situation continues or if they are seen to be effective policy changes.

To help ensure quality, the Australian Government could establish a set of minimum online delivery standards for providers to access CRICOS registration for international online students. TEQSA has developed a [Quality Assurance of Online Learning toolkit](#) for the APEC regions, which OES was invited to contribute to. This would be a good starting point to develop standards from.

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

It is widely perceived the increasing demand for micro-credentials, and other job-role specific certifications delivered on an on-demand basis, represents a frontier of new diversification and specialisation opportunities for the sector.

Micro-credentials represent a cost-effective and timely skills development option for individuals in comparison with traditional degree and certificate programs. Through micro-credentials, Australia will open up new international markets and market segments for high-quality online education providers.

Online education is a natural channel for the delivery micro-credential courses, offering on-demand delivery, faster training product or course development cycles than traditional academic providers and the scope for increased flexibility and customisation and personalisation of course materials to individual learning styles.

OES is experienced in developing micro-credentials, practical short courses and industry-certified training products. Through its connections to SEEK Insights, OES has the ability to identify, develop and deploy future focused courses which match market demand with an unrivalled speed.

However, for the tertiary education sector to fully capitalise on the growing demand for micro-credentialing, the identity of the types of programs within the Australian Qualifications Framework and the funding model for micro-credentials needs to be reformed. There needs to be an incentive for universities of all stripes to offer short courses that help to upskill the workforce and experiment with courses that provide for fast-moving technology driven sectors.

A potential practical measure that could be taken in this area is to allow domestic students to pay for their short courses via FEE-HELP. This would enable universities to invest in online short courses locally that could also be offered offshore as pathways into Australian online degrees.

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

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

OES is focused on educating Australians and giving them the skills and qualifications to find a job when they graduate. Our access to SEEK's rich market data provides OES with unique insights into current and future labour and training market needs. With our partner universities we draw on our unique data-driven insights when planning and launching new academic programs, which help ensure our program graduates can have the skills and employability profile required by industry.

With SEEK, OES has access to a unique capability to inform program development that is aligned to skills and employment market needs. Historically, the education sector has been slow to respond to shifting market requirements for skilled labour.

Online educational delivery is also better suited to the development and delivery of timely, industry-specific courses and programs, with a scale efficiency which may not be attainable by providers seeking to deliver the same program in a classroom setting at one institution.

Importantly, in these budget-conscious times, OES, as a data and technology-driven organisation, can offer greater measurement of student effort and accountability of government investment in higher education.

Work integrated learning embedded within university courses is considered gold standard for preparing future students for the workforce. Scaling this and offering opportunities for offshore international students to access Australian employers is an opportunity we are able to realise with the recent global adoption of technology to work remotely.

Online education can be tailored to include practical work experience, experiential content, and exposure to Australian industry and professional standards in academic programs. By enabling students to access these opportunities via online programs delivered to students within their home country, we will be able to foster opportunities for skilled migration and deeper ties with Australian institutions for international students who are offshore.

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

### **i. What is our value proposition for both international and domestic students?**

The value proposition of the Australian education sector is, and must remain, built around academic quality and student experience.

Whilst the depth of Australia's high-quality universities is well known, with 25 universities ranked in the top two per cent in the world as per Times Higher Education World University Rankings, what is less understood by policy makers, the media and the public at large is the extent of Australia's leadership in online education. In addition to being home to leading online institutions, Australians currently studying domestic programs via online delivery is at a globally high proportion of overall student enrolments.

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

Our major strategic challenge will be differentiating Australia's online courses in an increasingly crowded market. There is a key role for government in promoting the prestige non-academic factors which are strengths of the Australian Higher Education system, such as the lifetime economic opportunities which accrue to skilled migrants with Australian degrees.

Concurrently, ensuring that Australian education offerings for domestic students remain competitive is vital for the well-being of the sector, the students themselves, and the nation's skills profile. Maintaining existing FEE-HELP arrangements is critical to enabling student balance.