

Submission from the South Australian Government

Australian Strategy for International Education Consultation

June 2021



Australian Strategy for International Education Consultation

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1. EXECUTIVE SUMMARY

Our world has been faced with an unprecedented global pandemic. The pandemic has had a significant impact from an economic, health and social perspective, including on the international education sector. International education has a key role in the COVID-19 pandemic recovery for Australia and for the states and territories.

This is a opportune time to review and develop a new Australian Strategy for International Education 2021-2030 (the Strategy). Key to the success of the Strategy, and for it to be effective and efficiently implemented, the return of our international students must be coordinated nationally. South Australia will continue to work collaboratively with the Federal Government to bring students back to our state in a planned and coordinated manner. Delay to student returns represents a real impact to the sector. Without prompt return of our international students, we sit precariously against strong global competition, also eager to attract students. Australia's international education sector is at risk of losing students to international competition and jeopardising our reputation as a destination of choice that delivers world-class education.

The South Australian Government's submission is framed around the eight discussion questions within the Strategy Consultation Paper and provides a series of recommendations, to contribute to both a nationally coordinated approach to a new Australian Strategy for International Education and support the ongoing delivery of our state-based strategies.

1.1 RECOMMENDATIONS

(Broad Response to Consultation Question 1)

No	RECOMMENDATION
1	Address Student Returns – prioritise the safe return of international students. South Australia will continue to work collaboratively with the Federal Government to bring students back in a planned and coordinated manner.
2	National Agency for International Education – backed with dedicated funding to signal true commitment from Australian Government to the sector.
3	Student Visas - a ‘fit for purpose’ student visa framework, for example developing a streamlined visa extension process (with no application fees) in extenuating circumstances.
4	<p>Temporary Graduate Visa – incentives for regional areas</p> <p>4.1: Widen the range of occupations eligible for the temporary graduate visa (graduate work stream) in regional Australia</p> <p>4.2: Extend the duration of the temporary graduate visa for international higher education and VET graduates who are working in their skilled occupation in regional Australia.</p>
5	<p>Skilled Visas - including independent, state-nominated and employer-sponsored</p> <p>5.1: Ensure the skilled visas and Skilled Migration Occupation Lists are ‘fit-for-purpose’ to address regional skills needs and provide pathways for international graduates who meet these skills needs</p> <p>5.2: Reduce the length of work experience required for employer-sponsored visas to enable international graduates in critical sectors to be eligible.</p>
6	<p>Financial Support</p> <p>6.1: Sustained Investment in Marketing and Promotion</p> <p>6.2: Significantly increase Destination Australia scholarships funding to address diversification i.e. include additional tier for regional destinations to allow institutions in low-population growth cities to leverage scholarships (eg via Cat 2 and Cat 3 definitions used for skilled migration), instead of the current definition of regional used for these scholarships.</p> <p>6.3: Effectively implement appropriate regulatory and policy changes required to increase diversification of delivery models, including online, Ed Tech, and transnational education.</p>

7	Travel Exemptions 7.1: Continue to support existing travel exemption restriction process for year 11/12 students 7.2: Expand exemption criteria to all school-age international students who returned home at the beginning of the pandemic, and those who have committed to Australia as their preferred study destination.
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2. INTRODUCTION

South Australia recognises the contribution of the international education sector to the development of human capital in Australia and overseas and values the contribution made by international students' participation in the higher education, Vocational Education and Training (VET) and English language and school sectors. We welcome the Federal Government's proposed strategic direction to deliver world-class education and training which prepares domestic and international students for a rapidly changing job market and emerging occupations and skills.

South Australia likewise welcomes the Strategy's proposed strategic priorities, to improve employability and graduate outcomes and ensure international education in Australia can play an important role in meeting skills needs across the world, and in Australia. A coordinated national-level approach will be paramount to achieve these priorities.

Since February 2020, as a result of COVID-19 international movement restrictions, international students have been unable to travel to Australia to continue or commence their studies 'in person'-having a significant and ongoing impact on the value of the sector and its contribution to our state's and nation's economy.

International students are vital for South Australia's economy and businesses across multiple sectors that heavily rely on these students, such as tourism, retail and hospitality. In February 2021, Martin Haese, Chief Executive Officer of Business SA, delivered a strong message to the community of the sheer volume of students eagerly awaiting return to South Australia and the extensive detrimental impact of their absence to our businesses.

"There are more than 10,000 international students, holding valid visas, who are waiting to either return to SA to continue their studies and complete their internships, placements and degrees, or begin studying here. Half of SA's \$1.2bn foreign visitor expenditure is attributed to international study, including the students living here and their families who have visited. They're supporting everyone, from the Barossa winery tour bus drivers, to the mum-and-dad cafe owners in Robe to Rundle Mall traders".

[Martin Haese, 2021](#)

The Department for Trade and Investment (DTI) led a South Australian Government response to the Department for Education, Skills and Employment (DESE)'s consultation for the new Australian Strategy for International Education 2021-2030. DTI, through consultation with key government agencies, determined which of the Strategy's key priorities most aligned with the priorities for South Australia, and provides recommendations to enable the effective delivery of the new Strategy from both the national and South Australian perspective.

3. INTERNATIONAL EDUCATION SECTOR PLAN 2030

The [International Education 2030 Sector Plan](#) (the Sector Plan) outlines South Australia’s approach to working with the international education sector to grow the sector to \$3.0 billion in value and employ 23,500 South Australians through education-related jobs and those within the wider economy by 2030.

The Sector Plan forms part of the government’s industry-led South Australian [Growth State](#) Agenda which focuses on achieving higher growth in Gross State Product (GSP) to an average of 3% per annum. South Australian businesses, including those in the premium food and wine, health and ageing, tourism, technology, defence, space and creative industries, will be important beneficiaries of our success in assisting the best and brightest of our international students to stay in South Australia.

The Sector Plan outlines the South Australian Government’s direction and actions to support growth of the international education sector to 2030, underpinned by four core pillars:

INTERNATIONAL EDUCATION AS THE PLATFORM FOR ECONOMIC GROWTH IN SOUTH AUSTRALIA			
1	2	3	4
<p>Live, learn and stay in South Australia</p> <p>Investigate, develop and deliver clear visa and migration pathways, high-quality education outcomes and great student experiences to attract international students to live, learn and stay in South Australia.</p>	<p>Develop a global career in South Australia</p> <p>Investigate, develop and deliver employability and industry experience programs and pathways through stronger connections with industry to prepare international students for their global careers.</p>	<p>Build our global connections in South Australia</p> <p>Investigate, develop and deliver an expansive global footprint through extended alumni, networks of influence and an international focus in South Australian schools to build global connections.</p>	<p>Build leading industries in South Australia</p> <p>Investigate, develop and deliver a pipeline of talent and investment through international education to support the growth of the sector and our existing and future industries.</p>
<p>Encourage international students to live, learn and stay in South Australia through clear migration pathways.</p> <p>Offer all students the best on-shore student experience over the course of their studies including establishing new programs to support their wellbeing.</p> <p>Support the supply of quality student accommodation options.</p> <p>Pilot the new Supporting Innovation in South Australia visa.</p>	<p>Develop region and industry specific employment skills pathways.</p> <p>Investigate and develop an industry and research internship program.</p> <p>Investigate ways to increase support for international innovators, entrepreneurs, exporters and start-ups, and champion linkages between international students and industry.</p>	<p>Increase our global footprint through our new international trade and investment offices and extended reach of Austrade global offices.</p> <p>Develop and support education sector-specific outbound missions and high-value inbound delegations.</p> <p>Build our alumni and diaspora links to extend our networks of influence.</p> <p>Support the international schools sector.</p>	<p>Facilitate the growth and global connectedness of the state’s research, commercialisation and innovation sectors.</p> <p>Attract new education providers, agents and education investment to South Australia.</p> <p>Make significant investments in enabling infrastructure.</p>

South Australia’s international education sector has a clear, ten-year vision for growth and supports industries in the state to be globally competitive, by aligning with knowledge-intensive business models, innovation and entrepreneurship. The high quality of education, world-class institutions and great liveability of South Australia offers an environment where international students can excel during their



time of study and flourish following their graduation. With the assistance of targeted career and migration programs, South Australia will seek to attract international students and retain them post-graduation.

Alignment of our state's international education sector with the skills needed by local businesses is crucial to achieving the ambitious growth targets to which our government has committed. Our Live, Learn and Stay approach will allow us to work with the international education sector to achieve sustainable growth outcomes, however will require support from Federal Government to ensure programs and strategies that forge stronger engagement between international students and the future skills needed for Australian industries are delivered.

The International Education sector has a key role to play in pandemic recovery for Australia and for the states and territories, and we are progressing planning to return students back to our state as quickly as possible, whilst eagerly awaiting action from the Federal Government to enact reopening of international borders.

4. IMPACT OF COVID-19

4.1 Economic

International education in South Australia is a significant growth driver, worth around \$2 billion in export income, contributing an estimated 1.8% of total GSP, creating around 19,900 jobs. The impact of COVID-19 has seriously impacted the sector's contribution to the economy, with the Australian Bureau of Statistics showing a twenty-five percent decline in national value of as at March 2021.

VET and tertiary institutions anticipate that the largest expenditure losses are expected in the outlying years of 2022 and 2023 as the current cohort of students graduate and global competition increases. Of particular concern, is the substantial reduction of feeder activity through ELICOS (English Language) and Non-Award providers – an essential pipeline of educational services.

The South Australian Government school sector has likewise experienced a 38% decline in international student full time equivalents (FTEs) when comparing with both the 2018/19 (n: 1 544) and 2020/21 (n: 962) financial years. Such a significant drop in student numbers is also reflected in revenue reduction to South Australia, not only from the decline in student FTEs but also from the visitation benefits arising from Study Tour programs.

4.2 Travel and Border Closures

The border closures, enforced in February 2020, have resulted in an estimated 11 000 students unable to attend onshore 'in-person' education; along with 4 300 fewer student commencements. With corresponding student exits (finishing study) and an inability to enter South Australia to study, the 'off-shore' share, as reported by the DoHA in May 2021, is at 30% of total visa holders, around 10 478 students, and is expected to rise over 2021.

The negative impact of border closures has been, and will continue to be, significant within the school sector. For example, in addition to the full fee-paying international students, in 2019 the South Australian Government school sector welcomed over 1 750 students and accompanying adults on tourist visas for short-term Study Tour programs visiting South Australian Government schools and various tourist attractions. These visits act as a significant pipeline to delivering an important financial contribution to the aviation industry and local tourism attractions.

4.3 Competition and Demand

Australia's capability to attract the world's best and brightest to study in Australia, paired with access to favourable visa pathways to permanent residence, has never been more critical to building a pipeline of talent and skills that will contribute to our future skills, population and migration goals.

Australia's businesses, including those in the food and wine, health and medical, tourism, defence and creative industries, which rely on Australia's commitment to support knowledge intensive business models, and effective skilled migration pathways, will be important beneficiaries of our nation's success in remaining globally competitive.

5. **KEY PRIORITIES** *(Consultation Question 1)*

5.1 Rebuilding the sector

5.1.1 A National Approach

In order to effectively rebuild the International Education sector, a new, national government agency should be established to lead and co-ordinate the sector in Australia. The responsibility for different aspects of international education currently sits across numerous government departments and agencies, resulting in confusion and potential duplication for providers and other sector stakeholders.

A Federally funded national agency, led by a Minister with a dedicated International Education portfolio, would signal true commitment from Australia to a sector that not only drives economic benefits, but as importantly, contributes to Australia's global engagement for diplomacy and trade purpose. Deep engagement with dozens of countries is possible due to Australia's significant history of educating people from around the world. Establishing a national agency would send a very powerful message to current and prospective students and families that Australia values its international students.

A national agency would provide a focal point for engagement and consultation between industry and government. Key functions could include (across both inbound and outbound mobility):

- Marketing and promotion
- Insights and research
- Student engagement
- Policy
- Advocacy

While the establishment of a dedicated agency in Australia would likely require a machinery of government change to eliminate duplication, the benefits would include:

- Co-ordinated marketing activity (Team Australia)
- Co-ordinated engagement between international education and visa frameworks
- Framework to engage with other parts of the Australian Government (eg trade agreements)
- Timely and co-ordinated response to emerging threats
- Co-ordinated framework to support international students

One of the first critical tasks of the national agency would be to guide the recovery and rebuilding of the sector and implement the new national strategy in collaboration with industry.

The investment in such an agency is indeed warranted:

- a) In 2019 international education contributed \$40 billion to the Australian economy (Australia's 4th largest export), compared to international visitor contribution of \$31.4 billion within the same year. When considering international visitation expenditure, holiday-purpose visitation contributed \$10.4 billion (or 33%) whilst education-purpose visitation saw a *greater* contribution of \$12.3 billion (39%). Yet, a dedicated national agency (Tourism Australia) has been dedicated to tourism, funded by government (\$135 million in 2019-20 – as per the Federal Government's [Budget Paper 4: Agency Resourcing](#)) and pre-pandemic solely focused on promoting Australia internationally as a holiday and business events destination.
- b) Furthermore, globally competitive destinations are already employing varying approaches to departmental responsibility and investment in international education. New Zealand has already established a dedicated national agency – Education New Zealand. Likewise, Global Affairs Canada has a dedicated international education division, with government committing funding of CND\$148 million over 5 years, in addition to the CND\$8 million per annum of ongoing funding, upon release of their [Building on Success: International Education Strategy \(2019-2024\)](#).

In June 2020, Austrade expressed the importance of the strong connection between education and tourism.

“Not only do students make significant contributions to the economy through their expenditure on fees and living expenses, they also contribute to tourism through domestic trips during their stays, inviting family and friends to visit throughout their studies”. The students also contribute to Australia’s tourism workforce; over 11 000 international visitors who studied in Australia in 2019 worked in tourism or hospitality; and a further 12 000 worked in retail, as farm hands, in construction, childcare or other areas”, as per [Tourism Research Australia, 2019](#). <https://www.ieaa.org.au/blog/edu-tourism-and-the-impact-of-international-students>

The Federal Government, through Austrade, has recognised the importance of international education to the performance of other sectors of the national economy. The firm evidence of the strong pre-pandemic growth of the international education sector highlights the need for a dedicated national agency, much like Tourism Australia, to support and rebuild the sustainable growth of the sector.

5.1.2 The School Sector

The South Australian Government's commitment to a 'world-class public education system that empowers children and young people to study, live and work as global citizens' is clearly expressed in the [International Education Strategy 2019-29](#).

The young Australians in our schools and preschools are the next generation of leaders, problem-solvers and entrepreneurs. They will start businesses, innovate, and lead the communities and industries of the future. Regardless of where they go in life, they will need to interact with people from other countries, with different languages, cultures and perspectives.

Our young people need knowledge and capabilities for working with people with different languages and backgrounds, understanding local and global issues, and having the skills to communicate across cultural, social and professional environments.

The school sector will need a combination of short and long-term strategies to ensure immediate, then ongoing sustainability and viability, and mitigate potential reputational damage that occurred during the pandemic. It will be important to provide immediate and short-term support for the industry, to send a strong signal of support for international student program providers, and to students that Australia is open and welcoming, in order to shore up the economic contribution of the industry for the long term.

Short-term strategies:

- Welcome eligible currently enrolled international students back to Australia as soon as practicable whilst ensuring the safety of the Australian community. Continue to support students to return to study in Australia using existing travel exemption restriction process for year 11/12 students, and consider expanding exemption criteria to provide a framework that welcomes all school-age international students who returned home at the beginning of the pandemic, and those who committed to Australia as their preferred study destination.
- Acknowledge and emphasise the important role of all sectors, and particularly the value of the schooling sector, which offers educational benefits for young people related to the Australian Curriculum, but also plays a role in attracting students to stay in Australia with a further study pathway that can support the growth of a pipeline of international students into further education in Australia.

Longer term strategies:

- Invest in support for the sustainability of international education through diversification of markets and programs to meet changed market conditions and customer demand, without loss of focus on quality education provision, student wellbeing and safety, and education outcomes.
- Investigate the development of a national brand for Australia's school curriculum to support offshore promotion, particularly as it's competing with the International Baccalaureate and other national curriculums.

5.1.3 Across Sectors

Conduct sector specific research to better understand the impacts of the pandemic (health and economic) in key source markets and how this may manifest in demand for different programs. Research across sectors, could enable policy makers and providers to understand what Australia can do to increase demand and the propensity to be considered as an overseas study destination.

Consider investment support for the development of new delivery models, where warranted, to respond to demand signals. The traditional focus on onshore delivery has been disrupted and global economic impacts may require a more responsive provision model, that accounts for the market's diminished capacity to pay for education services. Research into demand could result in diversified or hybrid delivery models that blend online delivery, face-to-face delivery in market, and study in Australia.

Support the development and delivery of innovative community engagement and communications to build awareness of the benefits of international students in our education system, as well as the economic and employment benefits to our nation, and increase industry and community understanding of the benefits to local students and the broader community of welcoming international students.

Investment in market recovery and development should take a 'whole of sector' approach and consider materials, pedagogy, the use of EdTech services, reimagined pathways (schools/VET/HE, but also into industry and the community sector), and lifelong learning, such as ed tourism. The Strategy should focus on the strengths of the system to build relationships that support Australia's economic and trade relationships with a focus on promoting the quality of our courses and graduate outcomes.

5.2 Student Experience (Consultation Questions 2 and 7)

A new paradigm is emerging in response to the pandemic, and in anticipation of future disruption, we must future-proof our approach to the student experience and put the student in the centre of our strategy.

5.2.1 Visa Frameworks

Over the next 10 years, it is reasonable to expect further sudden large-scale disruption to students' learning through no fault of the student. This may include lockdowns, natural disasters, or other unexpected factors. In these situations, the student visa framework will require flexibility in its approach. The framework will require a 'fit for purpose' approach which will be critical to student and graduate visas, to demonstrate the Australian Government's recognition of factors outside of the students' control.

Putting the student at the centre of the visa process would mean, for example, the development of a fee-free student visa extensions process that could be applied in circumstances beyond the student's control - such as intermittent international border closures. In this example, key criteria would be developed to ensure only current, performing students are granted these extensions to negate any unintended incentives for 'gaming the system'.

Similarly, student qualification for the Temporary Graduate visa (subclass 485) should not be compromised by situations such as border closures, or the inability to obtain a student visa due to processing centre closures. The visa frameworks must anticipate future interruptions to provide confidence to prospective students.

To support student aspiration to obtain work experience in their field of study, and in consideration of the opportunities for work integrated learning (WIL) offered by providers, WIL should not count towards the 40 hours per fortnight onshore work limit.

5.2.2 Hardship Support

Through consultations with South Australian education institutions, charity and community organisations at the end of 2020, two common contributors to poor mental health outcomes amongst international students emerged – financial hardship and isolation.

A national approach to providing financial support to international students should be adopted during major interruptions to Australian economic life due to exogenous shocks. In these times, students, their families, education agents and consulates will look for leadership from the Australian Government in the care of students that have chosen to study in Australia. A state-by-state approach to student support, as in 2020, leads to a fragmented and confusing response for the students, providers and for the sector.

National government support for international students does not necessarily need to be equal in scale to the support provided to Australian citizens. It could be provided at a lower level and/or limited to students that meet certain criteria, for example those that were currently working and contributing taxes at the time of a lockdown or other economic interruptions.

It is important though that consistent support is offered on a national level. The actions of Australia during these moments of crisis for our citizens and our international students speaks volumes on a global stage. As a world leader in education, Australia's policies and actions will always be compared with those of competitor destinations; it presents an opportunity for Australia to reflect its values and demonstrably putting the student at the centre.

In relation to support for mental health of international students, which has become one of the major areas of need for student support, we point to the substantial amount of research that has been conducted to identify and document good practice in this area, including the [Orygen University Mental Health Framework](#). The implementation of steps set out in this report are endorsed.

In the coming years, education providers in Australia will need a clear focus on how the student experience will be supported through any future national or global disruptions, as the 'new normal'.

5.2.3 Community Sentiment

The community welcome that students receive during their time in Australia greatly impacts their study experience and advocacy for the destination. There is therefore a key role for all stakeholders across the sector, including the government, to play in educating the wider community on the breadth and importance of the international education sector.

Consistent messaging across the Australian community is required, to communicate the key role the sector plays in Australia's full global offering and the true economic and social value of the sector.

Government can play a critical role through engagement with other industry sectors, such as hospitality and tourism, to seek support and advocacy for the widespread benefits that international students bring to our nation.

Incentives (such as scholarships) could be offered to support students to return to face-to-face study in Australia, across all sectors and states/territories. One option would be to utilise the existing Destination Australia scholarships as both an incentive and a tool to encourage diversification.

Case Study:

To increase community understanding and support for international students at the end of 2020, a video was produced and promoted on social media highlighting the experience of a Chinese school student, living in a boarding house, who could not return home for the Christmas/New Year break to see his family. The video featured a local family who were intending to host him for Christmas and over summer. The intention was to put a human face to the plight of onshore international students, to create greater empathy and support from those in the community who don't normally give consideration to the individuals behind the headlines. StudyAdelaide

5.2.4 The Student voice

The Council of International Students Australia (CISA) has gained significant visibility and influence over the past decade, and never more so than during the events of 2020. However, CISA is fully run and led by elected international student volunteers who are also full-time students, as required by visa conditions. By nature, international students are also less familiar with Australian law, culture and customs. To support CISA's viability, sustainability, governance and continued advocacy for the hundreds of thousands of international students in Australia, their request for secretariat funding support is endorsed, either partly (with sector stakeholders) or fully by government.

5.3 Visas and Future Skills (Consultation Questions 3 and 5)

South Australia has identified nine priority Growth State sectors which will drive the State's economic growth. These include international education, health and medical, tourism, food, wine and agribusiness, defence, space, high-tech, energy and mining, and creative industries. To support the growth of these sectors, a highly skilled and responsive workforce is required, to provide businesses the right mix of skilled employees who can drive innovation, improve productivity and take up new opportunities in global markets.

5.3.1 Global Skills for South Australia

Skilled migration provides an injection of skills, talent and ideas into South Australia's economy when needed to complement our local skill base, and international graduates with the right skills and experience can play an important role in meeting South Australia's skills needs. Key skills and occupations in demand in South Australia which can be supported by the international education sector include health and medical professionals, aged and disability care workforce, ICT professionals, engineering and science professionals and technicians, business and finance professionals, creative industry professionals, and hospitality and tourism roles.

Maintaining skilled visa pathways for international graduates is vital to enable South Australia to retain highly skilled international graduates to support our Growth State sectors. South Australia welcomes the continuation of independent, state-nominated and employer-sponsored skilled visas, which provide the state with the ability to retain talented international graduates who have the right skills and experience to meet South Australia's skilled workforce needs, including in regional South Australia.

Similarly, the temporary graduate visa provides important opportunities to enable international graduates to gain the skilled work experience they need to be eligible for skilled visas.

South Australia welcomes the move to make greater distinction between different regional categories, and the current arrangements for regional international students and graduates, including additional points for regional study and the additional one or two years on the graduate visa for regional graduates.

Regional South Australia experiences skills shortages across a range of industries and occupations, particularly in areas where VET is required. The contribution of international graduates in helping to address these skills needs is an area of focus for the State Government.

Opportunities for further improvements:

South Australia would welcome further improvements to the temporary graduate visa and skilled visas to ensure they are well placed to facilitate migration pathways for skilled international graduates, who are working in their skilled occupations and who are meeting the State's skills needs, particularly in regional South Australia.

Opportunities include:

- Considering further incentives to the temporary graduate visas and skilled visas to further support regional centres and other regional areas, such as widening the range of occupations eligible for the temporary graduate visa in regional Australia, and extending the duration of the temporary graduate visa for international VET graduates who are working in areas of skills needs in regional Australia.
- Revising the Skilled Migration Occupation Lists and temporary graduate visa subclass eligibility to ensure they can support regional skills needs, not just national skills needs. One example is the need for specialised high skilled roles in ag-tech, agribusiness management and food production, which while in demand in regional South Australia, are not available on the Medium and Long-Term Strategic Skills List.
- Ensuring the temporary graduate visa is of an appropriate duration to enable international graduates to gain the skilled work experience they need to meet requirements for skilled visas, particularly employer-sponsored visas. One opportunity is to offer a second temporary graduate visa for those university and VET graduates who have been working in their skilled occupation for the duration of their first temporary graduate visa.
- Reconsidering the work experience requirements for employer-sponsored skilled visas to ensure appropriately qualified and experienced international graduates in critical sectors are eligible. Requiring three years of work experience to be eligible for the s186 and s494 visas is unobtainable for most graduates, even for those working in critical skills and sectors.
- Working with the relevant skills assessing authorities to ensure skills assessments remain fit-for-purpose. Some skills assessing authorities do not require graduates to have any paid work experience in their occupation, whereas other skills assessing authorities require at least 12 months. This, in combination with the occupation coverage of the Medium and Long-Term Strategic Skills List which determines eligibility for the temporary graduate visa has the potential to drive and distort enrolment decisions in a manner that may not align with Australia's future skills needs.

South Australia recognises that the main objective of international education is to provide global skills for a global economy. It is equally important to recognise that international education plays an important role in meeting Australia's skills needs, and skilled migration pathways should be optimised to ensure Australia can retain the best and brightest international graduates.

5.3.2 Vocational Education and Training

Improved policy and regulatory settings will be required to support the diversification, transformation, and growth of the international education sector in Australia; as per examples provided below;

- Remove disparity in student visa approval rate for VET in comparison to Higher Education.
- Review of the Genuine Temporary Entrant (GTE) framework to ensure it is not seen or used as a deterrent from attracting quality overseas students, who could form the future workforce of Australia, especially in skills shortage areas.
- Allow flexibility for contextualising VET qualifications for blended delivery to provide a higher degree of relevance in country.

Students with VET qualifications have the potential to significantly contribute to Australia's skills requirements. In order to seize and maximise this opportunity, the following should be considered in addition to the aforementioned:

- Create a premium national identity of VET provision in Australia, positioning Australia as the best VET system in the world.
- Encourage transnational delivery of VET programs that pathway to onshore provision.
- Support investment in EdTech to enable online/transnational/borderless education.
- Support placement opportunities for international VET students that leads to skilled migration and investment in South Australia.
- Extend government scholarships to support international students in accessing VET courses.
- Reconsider the development of education products to ensure they will give international students the skills to be globally mobile including soft skills, digital skills and the technical skills required to practise internationally.
- Streamline student mobility programs for the VET/TAFE sector across Australia.
- Develop and utilise a VET-wide alumnus tied to Unique Student Identifier (USI) to promote employment/networking opportunities domestically and internationally.

5.3.3 Future Skills

All students benefit from employability skills such as intercultural understanding and international mindedness, but also from the development of skills in product and/or service innovation, entrepreneurial thinking, problem-solving and leadership. The design and delivery of education provision can focus on international student enrolments that are towards future skills needs (both in Australia and in source countries). This may require research in skills needs (both here in Australia and in source countries) for future international students.

Schools need to produce globally engaged students, with state-based international education strategies important for internationalising our curriculum and our schools. There are opportunities to strengthen our school/industry connections, so that students, and their parents, understand the impact of choices they make as they progress through the school system to get the best outcome for the student.

Work experience and career immersion could be embedded into the student experience, to leverage the advantage of scale in Australia and also as a point of competitive advantage. Governments could examine incentive structures that support this to be a stronger feature of our education offering and consider how employment and industry exposure can be used to create a pipeline from school to further study or employment.

5.4 Regulation (Consultation Question 3)

Australia has a legislative and quality framework that exists across the entire international education industry, and amendments within these frameworks will likely be necessary to ensure greater oversight and control over the changing landscape and trends of education delivery models. Without national government attention, dedicated to implementing tighter regulations over online delivery and other emerging methods, Australia is at risk of damage to our strong reputation of offering a high-quality education system.

Short-term online delivery is a reasonable strategy to address the temporary pandemic travel restrictions, however the adoption is expected to become a long-term education strategy. As such, a range of flexible regulatory changes will need to be considered in response to this shift towards an increasing online delivery structure, including micro credentialing and changes to pathway programs.

Maximising continued student enrolments and retention throughout the long-term delivery of online education will also need to be considered, coupled with the right balance of flexible, yet regulated, oversight to support the integrity of our high-quality education.

5.5 Diversification (Consultation Question 4)

5.5.1 Markets

The Strategy should be underpinned by encouraging diversity within the international student population. Whilst Australia is keen for market diversification, the international education sector needs to understand the ambitions of non-English speaking markets, with any gaps in data to be further explored from a national level, such as their appetite and economic capacity of these markets. Markets within Europe and South East Asia have ambition to deliver internationally recognised qualifications (increasingly in English) which will present as another cost-effective choice to students who cannot afford to, or have difficulty to accessing, visas to study in Australia.

Approaching new markets is important, and certainly DESE and/or Austrade have a role to play to promote Australia to new markets and undertake relevant market research to ensure providers make informed choices. Bilateral policy support in the international education sector quickly opens doors for providers.

5.5.2 Delivery Models

Diversification, both in terms of markets and programs, ensures accommodation for the diverse needs and learning styles of our international students, both onshore and offshore. For example, through a blended delivery models with combinations of online, (including virtual, real time, on-demand) onshore and offshore in one program.

With an expected high uptake of online learning platforms, support for these new technologies as platforms to deliver on diversification in markets and programs be required at a national level to facilitate transition to the increase prevalence in electronic delivery effectively.

A possible long-term shift to a hybrid delivery model (online/offshore) will also need to be met with a revised operating model and pricing structure. The Federal Government could provide support for developing, trialling and adopting new technologies as platforms to deliver on diversification in markets and programs.

5.6 Marketing and Promotion (Consultation Question 6)

Australia needs to improve its reputation as not just a destination for quality education, but a welcoming study destination. This could be achieved by providing a roadmap for the return of international students, demonstrating what an Australian (and South Australian) degree or diploma means, and reaffirming our country's commitment to international education and students.

The sector requires an integrated approach to identifying and marketing what is 'distinctive' about an Australian education in a post COVID-19 environment, and South Australia is advocating for the government to support a Team Australia approach. Our competitors, particularly Canada and the UK, are well ahead of the game on this front and Australia needs to be far more strategic in planning and

prosecution to remain competitive. We thus advocate for a strong, confident brand that has critical resourcing behind it.

5.6.1 Branding

Australia must substantially and continually invest in projecting a relevant and appealing brand to compete on a global stage. [Nation Brand](#), and the application of this brand to the international education sector, provides the foundation for consistency across the sector. However, this alone will not be enough to meaningfully compete. To gain awareness, shift perceptions and recruit high quality students, Australia needs significant and sustained investment in marketing and promotion across markets. The current level of investment does not achieve this.

Aspirations for diversification in markets, teaching modality and course composition each require a large investment in marketing and promotion to build initial awareness and consideration. This cannot be done at the expense of marketing to maintain traditional markets in a competitive environment.

A strong Australian brand, speaking to our collective strengths in international education, would be leveraged by jurisdictions. This would serve two purposes; amplifying and strengthening the overall brand and providing a platform for jurisdictions to promote their own offering, supporting the overarching proposition.

5.6.2 Student-centred

A focus on communication and connection with all customer and stakeholder groups should be incorporated, including working on the community sentiment (social licence) for international students to return to Australia. This will require, not just overseas messaging, but also national, state, and local campus communications. International students will not return and stay just because borders are opened, hence the Strategy needs to ensure that students are truly welcomed, feel valued and supported. Furthermore, emphasis should be placed on communicating the value and benefits, beyond economic, that international students bring to our schools, universities and communities.

The 'distinctly Australian' point of difference can be demonstrated through clear study pathways and working relationships between all sectors (school and onto further study) to deliver a seamless student experience, sense of belonging and ongoing connection to Australia.

Messaging throughout marketing and promotion should be student-centred and focus on the experience, diversity of the offering, quality of education, wellbeing support, clear pathways to further study and clear indication on how the student experience will be supported through any future national or global disruptions.

6. CONCLUSION

COVID-19 has created significant and unprecedented challenges for not only the international education sector, but for the dependent sectors that rely so heavily on the students.

The international education sector continues to demonstrate the potential for ongoing growth post pandemic. The South Australian Department for Trade and Investment is working across government on several recovery initiatives, including the International Student Arrivals Plan (ISAP), a three-year Global Marketing Campaign as well as R&D and commercialisation activity. To effectively do so, will require support from a Federal level, particularly through the recommendations presented for DESE's consideration.

Improved policy and regulatory settings will be required to support the diversification, transformation, and growth of the international education sector in Australia.

The school sector will need a combination of short and long-term strategies to ensure immediate, then ongoing sustainability and viability, particularly to mitigate potential reputational damage that occurred during the pandemic.

South Australia recognises the main objective of international education is to provide global skills for a global economy. However, it is important to recognise that international education plays an important role in meeting Australia's skills needs, and skilled migration pathways should be optimised to ensure Australia can retain the best and brightest international graduates.

The South Australian Government supports the implementation of a new Australian Strategy for International Education, however assistance from the Federal Government will be critical to enable an efficient and effective national approach to recovery and sustainability of the sector and to leverage the work that all States and Territories are doing. Timing will be important, and we consider that the prioritisation of returning international students to Australia to be central before the full release of the Strategy, to ensure its success.

We look forward to continued engagement from the Federal Government throughout the immediate, medium and long-term implementation of this Strategy over the next ten years.

7. APPENDIX

ALIGNMENT WITH CONSULTATION DISCUSSION QUESTIONS

The South Australian Government's submission is broadly framed around the eight discussion questions, below, with reference to each response indicated.

1. **What are the key priorities for a new Australian Strategy for international education?**
 - Recommendations, p.4.
 - Section 5: Key Priorities, p.10.
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?**
 - Section 5.2: Student Experience, p.13.
3. **What changes are needed to make Australia more globally competitive over the next decade?**
 - Section 5.3 Visas and Future Skills, p.16.
 - Section 5.4 Regulation, p.19.
4. **How can providers, governments and stakeholders work together to achieve diversification opportunities (for example of disciplines, source countries, study destinations and delivery models)?**
 - Section 5.5: Diversification, p.20.
5. **What are the necessary skills for the future that students should be prepared for?**
 - Section 5.3 Visas and Future Skills, p.16.
6. **How do we create a uniquely Australian education experience?**
 - Section: 5.6: Marketing and Promotion, p.20.
7. **Community support for the international education sector is important for the sector's social license. How can the benefits this sector provides to Australia be better understood by wider community?**
 - Section 5.2: Student Experience, p.13.
8. **What else should the Council for International Education and the Australian Government consider in developing the new Strategy?**
 - Nil

8. CONTACT

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