

# Consultation on new Australian Strategy for International Education 2021-2030

Victorian Department of Jobs, Precincts and Regions  
(DJPR) submission to the Australian Department of  
Education, Skills and Employment (DESE)

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# Consultation on new Australian Strategy for International Education 2021-2030 | DJPR submission

This submission sets out the Victorian Department of Jobs, Precincts and Regions' (DJPR) response to the Australian Department of Education, Skills and Employment (DESE) and Expert Members of the Council for International Education regarding the new Australian Strategy for International Education 2021-2030.

This submission takes a long-term, 10-year view and is written in accordance with Federal and State Budget forecasts that there is likely to be a small and gradual number of international student arrivals in 2021, with larger numbers anticipated from mid-2022 onwards. This submission has been drafted in direct response to questions posed in the consultation paper for this strategy, as set out below.

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

The Australian Government's new Australian Strategy for International Education 2021-2030 (new Australian Strategy) presents an opportunity to re-evaluate the global trends in international education, recalibrate policy settings to support sector development, and re-position Australia as a leader in education, training and research in the post-pandemic world.

To achieve this, four overarching priorities are recommended for consideration – Australia's reputation and quality, talent attraction, market consolidation and diversification, and governance.

### Reputation and quality

Protecting Australia's reputation as a first-class study destination should be a key objective for the new Australian Strategy. Building our reputation is a longstanding strategic priority for the Victorian Government, as articulated most recently in its \$33.4 million [International Education Short-Term Recovery Plan 2020/21](#) and previous [International Education Sector Strategy 2016](#).

Achieving this requires a range of approaches, including positioning Australia as a welcoming study destination, safeguarding its high-quality education offering and research capacity, striving for excellence in student experience, and incorporating international education as an indispensable part of the broader Australian economic and social context.

It will also be important for the new Australian Strategy to acknowledge the impact of the COVID-19 pandemic on the sector and provide clear public-facing messages to both offshore currently-enrolled and prospective students on Australia's plan for reopening. This approach would not only demonstrate the Australian Government's commitment to international education, it would also provide a welcome signal to rebuild confidence and interest in choosing Australia as a study destination.

### Talent attraction and retention

Attracting and retaining talented international students and graduates with advanced knowledge, skills and experiences in priority occupations and industries is key to Victoria and Australia's success. Maximising the employability of international students also contributes to improved employment outcomes after graduation and, in turn, supports an uplift in Australia's global reputation as a top study destination.

Australia is currently facing fierce global competition, with countries such as the United Kingdom and Canada leveraging their visa settings to aggressively attract international

students. In the case of Australia, prudent steps could be taken to adjust visa settings in a manner that attracts high-calibre tertiary and post-graduate students that add to the country's human capital, while also managing risk and protecting the integrity of Australia's student visa framework.

### **Market consolidation and diversification**

Supporting the consolidation and diversification of our international education sector is a long-standing strategic priority for the Victorian Government as demonstrated, for example, in its [International Education Short-Term Recovery Plan 2020/21](#) and previous [International Education Sector Strategy 2016](#).

Greater market and product diversification are necessary to protect the international education sector from system shocks and downturns, enhance the quality of the student experience and respond to changes in global trends in education delivery, services and demand. It is fundamental to the long-term sustainability of Australia's international education sector.

Importantly, however, this emphasis should not be at the expense of existing relationships with our top source and partner countries. It will be important for the new Australian Strategy to strike a careful balance between growing new market opportunities, while consolidating and nurturing our established, longstanding markets.

### **Governance and implementation**

Key to ensuring the success of the Australian Strategy will be the articulation of how it will be implemented, including planned and funded actions to realise its goals and support tangible program delivery. This includes clarification on how the National Council and Australian Government agencies that have a role in international education (including DESE, Austrade, Department of Foreign Affairs and Trade (DFAT), and Department of Home Affairs (DHA)) will work together as one united and coordinated mechanism, with state and territory governments to deliver the Strategy over the next ten years.

## **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?**

The new Australian Strategy presents an opportunity for the Australian Government to lead the sector towards excellence in student experience. Fostering an outstanding student experience has been a strategic priority of consecutive Victorian Government international education strategies, including its recent [International Education Short-Term Recovery Plan 2020/21](#) and previous [International Education Sector Strategy 2016](#).

Achieving this requires work across a range of areas, including investment in the international student experience, raising awareness of information and support services throughout the student lifecycle, safeguarding quality and improving cultural competency through increased interaction between domestic and international students.

### **International student voice**

If the new Australian Strategy is to have students at the centre, the international students themselves should play a central role in its development and implementation. To hear the full breadth of the international student voice, considerations should be given to the diversity of this cohort such as gender, country of origin and education background.

It is recommended that the Australian Government establishes an effective mechanism to engage and communicate with students. This includes investing in leadership development

for international students from all sectors and ensuring international student diversity is reflected in government advisory mechanisms.

### Information awareness

The COVID-19 pandemic has further highlighted the importance of timely and targeted information provision. For students to have a positive experience, it is essential that they can access the right information or service at the point of need. Particularly on issues most concerning international students, such as visa settings and postgraduate work right entitlements, it is critical that the Australian Government develops responsive, timely policy measures.

It is recommended that the Australian Government considers improvements to current communication and information provision channels. Student feedback could also be sought to inform this process, with a view to ensuring students receive relevant and in-time information at each stage of the student lifecycle.

### Quality

Australia's high-quality education is a key pull factor for student choice. To safeguard Australia's reputation as high-quality education destination, there is a continuing need for Tertiary Education Quality and Standards Agency (TEQSA) and Australian Skills Quality Authority (ASQA) to address pre-existing risks which may be exacerbated by the current competitive student recruitment market. This relates to, for example, unscrupulous provider practices including lowering admission and English language requirements, lowering attendance and assessment requirements, and disingenuous agent practices including charging of exorbitant fees and facilitating onshore 'poaching'.

In addition to supporting strong and effective regulatory bodies, international students and providers could be engaged as active proponents for continuous improvement on education quality and standards. This includes promoting the regulatory role of TEQSA and ASQA so that quality information on each provider is available on their registers, and raising awareness on standards/legislative requirements among international students to encourage the early identification of systemic or provider risks.

### Cultural competency

Cultural competency and English language proficiency are closely linked to student success. Given the majority of Australian international students are from diverse backgrounds, it is important that they are supported to attain the expected level of English and cultural competence needed to excel in the classroom and future workplace.

To address this, the Australian Strategy could consider policy approaches that encourage providers to facilitate genuine cultural exchange between local and international students. This would increase the sense of belonging for international students, who should (but do not always) feel they are part of the university or institute's community. A true and genuine connection with their university and local community could greatly improve their experience, along with academic assistance from their education provider. This also presents an opportunity for domestic students to develop their intercultural mindsets and skillsets, in particular Asia-literacy.

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

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?

The global market for international education has become increasingly competitive, as recognised in the Victorian Government's [International Education Short-Term Recovery Plan 2020/21](#). This pressure has been heightened in response to the COVID-19 pandemic, as countries look to reposition themselves in response to the disruption caused by closed international borders and accelerated demand for digital education delivery.

Consideration of how Australia adapts its policy and regulatory settings to remain competitive in this context is welcome. If Australia does not act quickly, it risks significant and long-lasting reputational damage.

The recent [Navitas Agent Perception Report](#) shows Australia has already lost ground to global competitors such as the UK, US and Canada. While perceived as 'safe and stable', Australia is falling behind on 'open and welcoming' measures. This is particularly problematic given students clear preference for face-to-face learning, as outlined in recent [IDP Connect research](#), which indicates that 43 per cent of students are willing to commence online if they can later transfer to face-to-face study and a further 31 per cent are willing to defer until face-to-face study becomes available.

Visa policy settings are a key factor driving education mobility trends globally. There is a need to modernise Australia's visa framework to reflect current market demand, keep pace with other global competitors and safeguard Australia's reputation as a safe and welcoming study destination. Key global competitors – notably Canada, the UK and New Zealand – have all provided flexibility in visa settings for international students during the COVID-19 pandemic. For example, Canada has recently announced a pathway to residency for around 40,000 international graduates of Canadian institutions as well as a post-graduation work permit extension. In the UK, the new Graduate Route comes into effect in 2021 and, like Canada, its border remains accessible to international students.

In addition to visa settings, key policy and regulatory levers available to the Australian Government include education quality assurance mechanisms. Some options for consideration are outlined below. These approaches should be considered while ensuring Australia plays to its existing strengths by protecting its reputation, high-quality education and outstanding student experience offering – whether delivered onshore, online or offshore.

#### Talent attraction and post-study work rights

Post-study work options and employment outcomes are an important and legitimate factor in decision-making for genuine international students. Improving the attractiveness of post-study work rights is a balanced, prudent measure that could increase international enrolments. This could be achieved without creating perverse incentives in the student visa framework given the Temporary Graduate Visa (subclass 485) (TGV) post-study work stream is targeted at high-calibre tertiary and post-graduate students that add to the country's human capital.

For example, the extension of the current TGV two-year post-study work stream could be broadened to include Melbourne and other capital cities, particularly while recovering from closed Australian borders. The Victorian Government is supportive of the current extension which, together with the Destination Australia Scholarship Program, may provide a boost for international student enrolments in regional areas. However, given the vast majority of Australia's onshore international students are in metropolitan areas (for example, in 2020

around 97 per cent of Victoria's international students were enrolled with Melbourne education providers) – this is where the greatest impact of COVID-19 will be felt.

The Australian Government could also consider further temporary adjustments to visa settings to encourage students to commence online while borders remain closed and protect our international student pipeline. This relates to, for example, fast-tracked visa processing to incentivise the take-up of Australian study online; or, providing greater certainty to commencing online students regarding access to post-study visa pathways, regardless of when Australian borders re-open to their country.

Beyond post-study work visas, the opportunity to shift emphasis towards attracting high-calibre tertiary and post-graduate students also supports broader talent attraction objectives. International students and graduates are a critical cohort of talented young migrants for Victoria, which the Victorian Government's Skilled and Business Migration Program (SBMP) continues to seek and retain. For example, between July 2020 to April 2021, 69 per cent of all nominated Victorian SBMP applicants held an Australian qualification. Six per cent of all nominated applicants held a PhD, of which more than 71 per cent were from Australian universities.

Prioritising talent attraction could see Australia take a sensible, measured approach to building skilled business migration, global talent and entrepreneurship visa pathways for international students, while addressing critical skills and labour shortages and supporting economic recovery.

### **Quality of blended delivery models**

As the nature of education service delivery shifts, it will be important to ensure Australia maintains its reputation of delivering a high-quality education offering. Achieving this requires strengthening the role of TEQSA and ASQA in regulating online, blended, offshore and articulation program delivery models and quality.

While it is administratively very challenging to regulate all offshore activity, this could include a point-in-time 'approval' from TEQSA or ASQA for non-Australian Qualifications Framework courses.

Currently there is a lack of national guidelines on what constitutes good and high-quality online delivery. This is a piece of work the national regulators could provide to the sector, while also providing global assurance of Australia's online offering.

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

Supporting the diversification of Victoria's international education sector is a longstanding strategic priority for the Victorian Government, as noted above. Opportunities exist not only for source countries, but also fields of study, study destinations and product offerings.

In approaching this question, it is critical that the Australian Government also consider how to ensure regulatory settings reflect policy intent. For example, structuring visa settings to encourage diversification into new markets, or ensuring regulatory settings encourage the take up of blended delivery models.

### **Source market consolidation and diversification**

As indicated above, the Victorian Government is supportive of market diversification strategies that mitigate risk by reducing over-reliance on a small number of markets, while continuing to play to its strengths and maintain its standing in longstanding top markets.

The new Australian Strategy should look to consolidate and nurture its linkages with China and India, which comprised around 45 per cent of Australia's international student cohort in 2020. At the same time, it should expand its reach into other markets throughout Southeast Asia and Latin America, particularly segments with high-calibre higher education students.

### Supporting online delivery models

Given the continued Australian border closure, it is vital that Australia grows the number of international students commencing studies online. Achieving this is key to stabilising the international student pipeline, with implications for Australian international student enrolments for years to come.

However, there are several barriers to growing this market segment that warrant addressing. The quality of Australia's online courses are variable or not well understood by the market, courses are not tailored to different market segments (for example, young students wanting to come onshore versus older students looking to reskill) and are competing against global brands that are, in some cases, offering similar courses at lower cost. Supporting the sector to provide higher quality online courses that are globally competitive would not only diversify revenue streams, but also secure a student pipeline for when borders reopen.

Encouraging the commencement of courses online would also position Australia to remain competitive in the medium to long-term by responding to the changing nature of global education service demand and delivery towards blended models.

The Australian Government should also consider approaches to foster a thriving edtech and innovation ecosystem. By connecting our strengths in technology and education, our sector would be well-placed to develop and implement innovative educational approaches for student cohorts with increasingly high expectations of a digitally supported learning experience.

### Australia as a leader in quality TNE delivery

Australia could be a leader in quality offshore delivery. This approach would support our sector in responding to increased offshore demand for international qualifications delivered in-country, offering a high-quality yet more affordable experience. Further, it presents a viable alternate product while global mobility is restricted.

Building on existing transnational education (TNE) approaches, this model should be flexible and remain relevant to shifting global trends in training, education, research and industry demand. It could include elements of online delivery and, subject to border restrictions easing, two-way student mobility and/or articulation to Australia for completion of studies in later years. Models that are cross-sectoral and aim to build the student pipeline should be encouraged, creating pathways between international schools, English language, VET and/or higher education programs. So too should these models incorporate work integrated learning components, in partnership with industry and government to interface with local and global workforce needs.

To facilitate these new products, the Australian Government could be more active in driving sector opportunities and reform. Agencies such as Austrade, DESE, TEQSA and DHA all have a role to play. For example, they could work together to take a stronger approach to facilitating new opportunities, develop a best practice framework, demonstrate rigorous quality oversight in the offshore context and ensure the student visa framework aligns with policy intent.

## 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?

### Employability in a globally competitive market

Improving the employability of international student graduates is key to our sector remaining globally competitive. This has consistently been recognised in Victorian Government strategies, including the [International Education Short-Term Recovery Plan 2020/21](#) and previous [International Education Sector Strategy](#).

Australia could further differentiate its offering by better integrating career-oriented, value-adding components into course programs, delivered by providers and supported by government and industry, coupled with global perspectives. Consideration should also be given to the role of Australia in the global ecosystem and how it responds to social and global problems, as well as the employability outcomes arising from this.

Some examples could include: sector-specific skill training developed and delivered in partnership with industry; local and international work integrated learning programs; inclusion of extra-curricular and co-curricular programs that cover transferable work-relevant skills; and opportunities to participate in industry events either virtually or in-person.

### Enhance employment outcomes for international graduates

Employability and employment outcomes are key measures of student success. However, recent research shows that up to 56 per cent of TGV holders either work outside their field of study (35 per cent) or are unemployed (21 per cent).

To enhance the employability of international students, additional resources are often required to familiarise them with Australian workplace culture and to gain real life work experience. Apart from state and territory initiatives such as the Victorian Government's suite of employability programs (outlined in its [International Education Short-Term Recovery Plan 2020/21](#) and previous [International Education Sector Strategy 2016](#)), education providers are usually the first point of contact for student employability support. The level of access to employability resources among education providers varies, which results in inequity of access for some students.

The Australian Government could consider options to increase and/or improve employability support in student service offerings. Employability initiatives for international students supported by the Australian Government would also be welcome. Not only could this set a best practice model for the sector, it would also send a positive message that Australia is committed to student success. These initiatives could include promotion and incentives for employers to take on international students for work integrated learning or during graduate visa periods.

### International student and entrepreneurship

International students have great potential to engage in entrepreneurial activities. Research undertaken through a Victorian Government international education program found that international students are very interested in entrepreneurship, including in small business, being involved in or establishing their own start-up, and opportunities to build business links between Australia and their home country.



These findings are supported by survey insights from Start-up Muster, the largest survey of the Australian start-up ecosystem, which found that 40 per cent of future founders were born outside Australia, 20 per cent of future founders were studying and 22 per cent of start-ups had at least one employee on a visa.

It is recommended that the Australian Government invest in supporting entrepreneurship among international students and consider onshore international students and graduates a potential source of Entrepreneur visa applicants.

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

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

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

The unique Australian education experience comes from Australia's world-class education offering, together with its high-quality living environment and diverse lifestyles. This has been consistently recognised in Victorian Government strategies (notably the [International Education Short-Term Recovery Plan 2020/21](#) and previous [International Education Sector Strategy 2016](#)) and captured at the state-level through the Study Melbourne brand.

The new Australian Strategy presents an opportunity to position Australia as a study partner and destination that enables the full realisation of student potential – not only in academic attainment, but also in personal and professional development which brings life-long benefits. This comes from Australia's globally renowned education system and its focus on quality assurance, student experience and employment outcomes. Victoria's position as a leader in research should also be leveraged, with research-led education featured as a differentiator that allows students access to the latest cutting-edge thinking.

Maintaining Australia's world-class reputation for education requires that our graduates are equipped with modern global citizen skills. There is an opportunity for Australia to better engage international students in university life and create meaningful exchanges with domestic students and the broader community.

As delivery models diversify, it is important to extend the Australian education experience to offshore and online students. This will involve creating a learning environment that resembles the Australian system, fostering a sense of collectiveness and encouraging meaningful exchange among all students, regardless of location or learning model. For offshore and online student cohorts, it will be important to deepen links with Australia by involving them in Australia's offshore alumni networks, trade and industry-specific events and opportunities.

## 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?

Improving community sentiment and building the international education sector's social license to operate will require active thought leadership from senior representatives within government, the education sector and industry. Not only is there a need for a breadth of strong voices in support of international education, the narrative should be shifted from a one-way economic focus to capture its longer-term social and cultural benefits. Greater communication focusing on positive stories and achievements of current and former international students, including their contributions in different social settings and to industry, would be welcome.

The narrative should reflect the reciprocal nature of international education, including the mutual benefits and drivers of two-way exchange and global student mobility. It will be important for the new Australian Strategy to recognise that all students, both domestic and international, are to benefit from fostering a globally orientated and connected education sector. Consideration should be given to the contribution that Australia wants to make to global problems, as well as the employability outcomes that could arise from this. Australia's dominance in the Times Higher Education (THE) Impact Rankings against the United Nations' Sustainable Development Goals is one such example.

More could also be done to increase awareness of university research impact, and its role in sustaining an innovation ecosystem that enables societal and human development. International students are a key part of this story, comprising around 36 per cent of Australia's total postgraduate research students in 2019 (DESE Higher Education Statistics Collection).

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

It will be important for the Australian Government and Council for International Education to articulate how the new Australian Strategy will be implemented, including planned actions to realise strategy goals, funding allocated to support program delivery, and clarification of how Australian Government agencies will work together and with state and territory governments to deliver over the next ten years.

Given the volatile global context acknowledged in the paper, including the uncertainty in the short and medium-term regarding the COVID-19 recovery trajectory, it is also worth considering when the strategy might be reviewed to ensure it remains fit-for-purpose.

In the context of the new Australian Strategy, it is recommended that improved governance and communications arrangements with relevant state and territory government agencies be considered. For example, better connecting the Council for International Education through to an operational state and territory sub-group, such as the Commonwealth, State and Territories International Education and Training Forum (CSTIETF), which meets regularly and has clear governance arrangements that provide for communications to and from the Council.

Finally, there is a need for improved monitoring of and access to international education services data. If the Australian Government is to encourage diversification through blended modes of delivery, greater transparency and reporting of online delivery and related services is required. The sector would also benefit from more regular, detailed and reliable data on key indicators such as education export value by state, per source market. There is also a need to better understand load (equivalent full-time student load, EFTSL) beyond the headcount currently reported in PRISMS. Alongside deferral data, this will be particularly important in monitoring student enrolment trends, the sector's recovery trajectory and developing targeted and effective policy responses.