



**Hon Sue Ellery MLC  
Minister for Education and Training  
Leader of the Legislative Council**

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Our Reference: 60-29552

The Hon Alan Tudge MP  
Minister for Education

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Dear Minister

**SUBMISSION TO AUSTRALIAN INTERNATIONAL EDUCATION STRATEGY  
2021 – 2030**

Thank you for the opportunity to provide a submission in response to the consultation paper: *Connected, Creative, Caring: Australian Strategy for International Education 2021 – 2030*. Please find enclosed the Western Australian Government's submission.

Enquiries about the submission can be directed to Ms Simone Spencer, Deputy Director General – Strategy and International Engagement, Department of Jobs, Tourism, Science and Innovation via email at [simone.spencer@jtsi.wa.gov.au](mailto:simone.spencer@jtsi.wa.gov.au) or telephone on (08) 6277 2819.

I look forward to the release of the strategy.

Yours sincerely

  
SUE ELLERY MLC  
MINISTER FOR EDUCATION AND TRAINING

17 JUN 2021

**-WESTERN AUSTRALIAN GOVERNMENT SUBMISSION  
AUSTRALIAN STRATEGY FOR INTERNATIONAL EDUCATION  
CONSULTATION PAPER**

The following sets out the Western Australian (WA) Government's submission in response to the Council for International Education's consultation paper on *Connected, Creative, Caring: Australian Strategy for International Education 2021-2030* (the national strategy).

The WA Government released its Recovery Plan in July 2020 to address the economic, social and health impacts of the COVID-19 pandemic across the state. The WA Recovery Plan outlines the state's pandemic response, with a focus on recovering the priority sectors that are key to WA's economic development and diversification agenda, as well as the sectors and cohorts that have been most impacted. International education is identified as a priority sector in WA and continues to be significantly affected by travel restrictions that prevent international students from coming onshore. To respond to this, and complement the State's Recovery Plan's intent, the WA International Education Recovery and Renewal Plan (WA Recovery and Renewal Plan) was released in December 2020. It sets out WA's strategic approach to supporting the recovery of the international education sector to enable it to emerge from the pandemic in a position of strength and achieve long term sustainability.

Western Australia has been very successful in managing the spread of COVID-19 and this has been achieved by a safe and sensible controlled border arrangement, based on public health advice, and this will continue as required.

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

While the development of a national, long term strategy is welcomed, the focus in the first instance should be on ensuring the immediate viability and recovery of the international education sector. A key priority of the national strategy should be a clear and direct commitment from the Australian Government to getting the sector back onto its pre-pandemic growth trajectory as quickly as possible, through the development of a short term national recovery plan embedded in the national strategy. It is suggested this plan outline a range of initiatives and actions designed to support the recovery of the sector across Australia.

Through the WA Recovery and Renewal Plan, the WA Government is implementing a range of initiatives to provide immediate support to high quality education providers and to students, as well as longer term initiatives linked to sector growth and sustainability. Action at a national level that complements these initiatives and harnesses the collective capabilities and resources of government would amplify these efforts.

Key initiatives of the WA Recovery and Renewal Plan are:

- The development of an **offshore marketing strategy** for the WA international education sector. The marketing strategy will support the rebuilding of the pipeline of future students, including the promotion of immediate conversion opportunities for online delivery channels, while laying the foundations to drive onshore market share when travel is possible. A commitment from the Australian Government to developing a clear brand and messaging for the sector (and sub-sectors) that states and territories can leverage would provide a solid platform to boost Australia's profile as a desirable destination to study, live and work, and strengthen consistent messaging.
- The delivery of initiatives and funding that provides **immediate support to small and medium education providers** to maintain their viability and ensure longer term sustainability. The WA Government has recently delivered the International Education COVID-19 Industry Support Fund that provided eligible small and medium sized education providers with grants of up to \$50,000 to maintain their operations; and is also delivering the Online Capability Fund program

to enable education providers to transition to quality online and hybrid delivery models. Acknowledging the Australian Government's recent announcement of its \$53.6 million package for the international education sector, additional investment in similar initiatives to continue to sustain the sector while international borders remain closed would be welcomed.

- Implementation of a range of **student engagement and wellbeing programs** to support the onshore student cohort. The Australian Government should lead the promotion and delivery of coordinated student support and wellbeing initiatives with a focus on preventative mental health strategies in response to the pandemic, and as part of the general student experience.

## ***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 wellbeing of international students was a key issue for the sector prior to COVID-19 due to isolation and cultural, language and academic barriers faced when studying onshore, and this has been exacerbated by the pandemic. It is critical government and education providers invest in the mental health, wellbeing and safety of international students to address this. Keeping students engaged and providing support will contribute to a positive studying and living experience in Australia, and will enhance Australia's reputation as a provider of world-class education.

In recognition of this, the WA Government is working with education providers, community groups, consular corps and StudyPerth, a non-government peak body, to implement targeted international student engagement and support programs. The programs aim to improve the mental health, wellbeing and safety of students, increase student engagement with the community, and ultimately improve students' experience and satisfaction with studying in WA. Programs will connect students with iconic WA tourism attractions and experiences, build safety awareness and skills through the delivery of various programs, such as swimming lessons, driver safety courses and city after-hours night safety programs, and support good mental health outcomes by establishing and promoting fit-for-purpose mental health resources. Grants are also being made available to education and training providers to deliver their own student engagement and support initiatives, which may include events, training programs, community-based activities, and cultural and health programs.

It is imperative the Australian Government address the impact the COVID-19 pandemic has had on international students, and the student experience in Australia, within the national strategy. Implementing targeted national programs and providing funding to the states and territories to deliver tailored initiatives for their student cohorts and unique challenges is encouraged in this area.

To improve the experience of students who remain offshore and drive longer term sustainability of the sector, the WA Government is also focusing on the expansion of sustainable, high quality online learning delivery. Through the Online Capability Fund, grants of up to \$40,000 have been provided to education providers to support them in maintaining, expanding and optimising their online or remote capabilities, virtual engagement, course offerings and services. Further investment in initiatives that enable the international education sector greater innovation at a national level will ensure that Australian providers' offshore and online education is responsive, client focused and maintained to the same standard as onshore face to face delivery, thereby enhancing the student experience and the country's reputation as a high quality provider of education.

## ***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 COVID-19 pandemic has had a significant impact on the student experience and highlighted the need for flexibility in sector regulation and student visa requirements, particularly those relating to online and distance learning, and work-based training or work-integrated learning provisions. In order to make Australia more globally competitive, the national strategy should consider reviewing the

legal framework governing the delivery of education to international students in Australia, the *Education Services for Overseas Students Act 2000* (ESOS Act) and associated *National Code of Practice for Providers of Education and Training to Overseas Students 2018* (National Code 2018), to ensure they meet the changing needs and demands of students and the sector.

Due to international travel restrictions, many international students enrolled to study at Australian institutions have remained overseas and are undertaking their courses online. This has impacted on the ability of these students to complete mandatory onshore study requirements and work placements that are determined by the ESOS Act and National Code 2018. While the national regulators, the Australian Skills Quality Authority (ASQA) and Tertiary Education Quality and Standards Agency (TEQSA) have issued a joint statement indicating they will be flexible in their regulatory activities in order to support students to study online outside Australia, these are only interim arrangements and a longer term commitment to reforms should be considered.

In addition, the Australian Government has announced changes to the eligibility of post-study work visa requirements whereby online study undertaken outside Australia as a result of travel restrictions will be counted towards the Australian study requirements for existing and new student visa holders, and graduates affected by COVID-19 travel restrictions, will be able to apply for and be granted a post-study work visa outside Australia. This is strongly supported and consideration should be given to longer term implementation of the changes within the national strategy.

A more complete review of the impact of the COVID-19 pandemic on the delivery of education to international students enrolled in Australian institutions is required to enable the establishment of standards and guidelines that reflect the changed environment relating to the delivery of education to international students both in and out of Australia.

Post-study work rights are highly sought after and a key driver of international student choice of education destination. The opportunity to work in Australia after graduation is an attractive proposition for international students and strengthens their future employment prospects. While Australia offers post-study work rights that are comparable to those provided in the United States, United Kingdom, Canada and New Zealand, only students who have completed a higher degree (bachelor or above) are eligible. It is recommended the Australian Government consider the extension of post-study work rights to students who have completed a VET qualification. We should have a national approach to extend post-study work rights in those areas of the Australian labour market where there are clear skills shortages.

The option of skilled migration is also a determinant in international student choice of education destination. Policy settings and incentives that promote improved access to skilled migration should form a key element of the national strategy.

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

A collaborative approach to the development and implementation of the national strategy inclusive of all stakeholder groups in the sector will be essential to its success, particularly in leveraging the unique and diverse expertise, networks and levers that exist within the international education ecosystem as the WA sector has done.

The WA Government has long recognised the importance of cross-sector collaboration to facilitate diversification opportunities. It was this understanding that led the WA Government to establish the WA International Education Advisory Group (Advisory Group), a cross-sector group that is responsible for facilitating a strategic and coordinated approach to international education. The Advisory Group was established in early 2020, and brings together key government and non-government stakeholders to shape the strategic direction of WA's international education sector and to collectively identify opportunities for collaboration, partnerships and diversification.

Its membership comprises:

- WA Government agencies responsible for managing the state's training and education policy, curriculum development, investment and trade opportunities, and international trade and investment office network.
- Australian Government agencies responsible for overseeing the nation's trade activities and foreign affairs.
- Providers from across WA's international education spectrum, including schools, TAFEs, private VET and ELICOS providers, and higher education organisations.
- Peak bodies responsible for representing the interest of providers and students.
- Sector partners that support and shape WA's international education sector, including representatives from the aviation, tourism and events industries.

It was through the leadership and direction of the Advisory Group that the WA Recovery and Renewal Plan was developed. The WA Recovery and Renewal Plan builds on collective action within the sector and harnesses the funding, policy, regulatory and stakeholder levers available to members to support the breadth of the WA international education sector. It aligns with the state's diversification agenda where international education has been identified as a priority sector and harnesses the reach of WA's offshore network. This network includes in-country Education Business Development Managers in Vietnam, Indonesia, South Korea, India, Japan and China who are dedicated to promoting the sector internationally to students and education agents.

Given Australia's extensive international trade networks and resources, it is recommended the Australian Government, through Austrade, and in consultation with the states and territories, develop and lead a coordinated national approach to the identification of priority international education markets and diversification opportunities.

## **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?***

A number of recent industry reports have highlighted that Australia and, in particular, WA is experiencing skills shortages across a number of industries and these shortages are likely to become more acute over the next few years.

To support this, a data-driven approach must be taken to skilled migration. Decisions must be supported by up-to-date labour market information, such as job vacancy rates, employment growth projections and employment by industry and occupation. Basing these decisions on reliable and publicly available data will also ensure transparency and certainty of future employment prospects for international students.

The national strategy should consider skilled migration and post-study work rights policy settings for international students, as a means of ensuring students have the skills to compete in a global labour market and potentially provide a valuable source of skills for Australia. In terms of skills development, the VET sector and TAFE in particular, is very well placed to respond to skills shortages and meet skills needs especially in the regions.

Beyond having the right qualifications to meet these global and domestic workforce needs, Australia's international students must also have the requisite skills to be considered 'job ready'. It is recommended the national strategy include initiatives and funding that focus on equipping international students with these skills post-graduation, with a greater emphasis placed on:

- the provision of practical and relevant work experience;
- creating opportunities for students to link with the business sector via internships and industry networking events;
- developing students' communications and English language skills appropriate to the workplace, as well as general workplace skills and understanding of expectations;

- fostering career education and job search skills; and
- promoting engagement between international students, local students, employers and the wider community.

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

In a country with such diverse strengths and opportunities, the Australian Government, through the national strategy, has an opportunity to define what the “uniquely Australian” education experience is. Now is the critical time for a clear, unambiguous and uniquely Australian creative platform to be established that will build confidence in our brand. The platform should encapsulate Australia’s unique selling propositions at a national level to raise awareness and build the profile of Australia. It is imperative it provides impact on a global scale, whilst resonating locally to meet the nuances of diverse offshore markets. This then enables states and territories to leverage and align with the messaging to amplify their efforts.

By way of example, outside of the COVID-19 pandemic context, Tourism Australia promotes Australia in key offshore markets through campaigns and public relations initiatives. States and territories can then leverage and align their messaging and marketing activities, with a focus on their own destination’s unique selling propositions (USPs). This alignment creates greater impact and attention among target audience groups and considerably raises the nation’s profile.

### ***i. What is Australia’s value proposition for both international and domestic students?***

Perth’s overarching USPs give credence and guidance for the development of the overarching creative platform, in addition to sector consultation and targeted market research insights. They include factors that are unique to WA, as well as factors that are nationally relevant that the Australian Government can capitalise on in collaboration with all states and territories. Listed below are the high level USPs identified for Perth and WA that could be broadened to be utilised in the national context. The inclusion of these in the development of a national creative platform is encouraged.

- **Experience** and **engagement** factors such as safety, lifestyle, and tourism attractions.
- **Economic growth** and **stability**.
- **Employment prospects** and **enterprise opportunities** created through Australia’s strong research partnerships, government and trade connections, and multinational business affiliations. Australia is also home to world-leading sectors that are at the forefront of innovation, such as mining and medical research.
- **Attractive migration policies** in terms of skilled migration pathways and post-study work rights.

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

While the true value of the Australian education experience lies in the ability to study onshore with Australian students, and experience the country’s attractions, community and lifestyle firsthand, opportunities do exist to offer a high quality education experience to students studying offshore.

As mentioned under question two, the Australian Government has a role to play in supporting education providers to increase their capability and capacity to deliver high quality education and training online.

The Australian Government could also explore opportunities to expand and secure Australian education providers’ offshore footprint by supporting institutions to establish a greater physical presence in other countries through models such as study hubs.

**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?**

It is recommended a national communication strategy is developed to clearly articulate the benefits the international education sector provides to Australia, including a framework to guide how these benefits are best communicated to different stakeholder groups in a consistent manner.

This would assist in building a greater understanding of the significant contribution made in economic, social and cultural terms which is currently not well understood by the wider community.

In addition to proactive and strategic communications, it is important the wider community are provided with opportunities to positively engage with international students to deepen and embed their understanding and appreciation of the benefits and positive influence that students can provide. The international student engagement and support initiatives that involve engagement with local communities, community organisations and experiences that the WA Government is delivering (referenced the response to question two) provide examples of how these connections can be facilitated and strengthened. Initiatives like these implemented nationally under the national strategy would assist in growing positive community sentiment and send a strong signal to existing international students and those considering undertaking their studies in Australia that they are welcome and valued.

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

As articulated throughout this submission, WA identifies the following as key priorities for the national strategy:

- Acknowledgement of the significant impact that the COVID-19 pandemic has had on the international education sector, in particular, small to medium providers and students, and specific actions to address immediate areas of need.
- Development of an overarching national brand and marketing strategy for the sector that can be leveraged by the states and territories.
- Consideration of the recommended policy, regulatory and legislative reforms that increase the sector's ability to attract and retain students, operate more effectively and remain globally competitive. The entire international education spectrum, including schools, VET and ELICOS providers, TAFEs, and universities, should be considered when expanding and introducing new measures and reforms.

Other considerations include:

- Recognition of the role played by specific sub-sectors that are not often highlighted, including the school sector, which is both a quality education provider and channel for prospective students to the VET and higher education sectors, and the TAFE sector which provides a high quality and tailored experience for international onshore students.
- The promotion of opportunities for transnational education, focused on nurturing offshore partnerships with governments, students and their parents, education agents and institutions for key pipeline opportunities and pathways between sectors.
- The implementation of incentives for employers to take on international students in areas that align to national and/or state-specific skills shortages and workforce needs, as well as in priority sectors that contribute to the diversification of the economy. The Australian Government could consider financial or tax incentives to encourage Australian industry to employ onshore students as well as encourage greater industry-sponsored skilled migration.

A copy of the WA International Education Recovery and Renewal Plan can be found by scanning the QR code below or via this link: [https://www.wa.gov.au/sites/default/files/2020-12/International-Education-Recovery-Renewal-Plan\\_0.pdf](https://www.wa.gov.au/sites/default/files/2020-12/International-Education-Recovery-Renewal-Plan_0.pdf)

