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International Education
Association of Australia



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Comment on Australian Universities
Accord Panel Discussion Paper

April 2023

Introduction

The International Education Association of Australia (IEAA) is the only multi-sector peak body that seeks to represent all facets and delivery areas of the dynamic international education community in Australia. Our 4,000-plus individual and institutional members work in public universities, government and independent schools, public TAFE, English Language Colleges, and independent higher education and VET providers. Through professional development, research and advocacy initiatives, IEAA strives to empower professional staff and academics, engage institutions and enhance our nation's reputation as a provider of world-class education.

Our Association appreciates the opportunity to provide a submission to the Australian Universities Accord Panel based on its Discussion Paper. As our CEO, Hon. Phil Honeywood, is also a member of the Accord Reference Group he is available for further discussions in relation to our below commentary and recommendations. In drafting this submission, we have attempted to limit our feedback to the key issues that our members see as impacting specifically on international education. We note that this relates primarily, but not exclusively, to Section 3.8 and Questions 43 and 44 of the Discussion Paper. Our key points are as follows:

1. Australia has long been criticised by other study destination countries and our Indo-Pacific regional neighbours as being too focussed on “making money” from full tuition fee-paying overseas students. As our Association often represents Australia at global international education association fora, we find that affiliated associations (particularly in Europe and North America) are more concerned about the public good that derives from the internationalisation of education than the profit motive. They view their internationalisation efforts as fundamental to fostering peace, security and well-being. Over many years, the conclusion that we have reached is that international education should not be used as a measure to cover shortfalls in funding to subsidise other areas of higher education activity. The current business model for public institutions is over-reliant on international students to subsidise areas that overseas Governments would normally fund, such as research, infrastructure and student services. At the very least, if our nation continues to rely heavily on overseas student fees to prop up our public education providers, then it is incumbent on Australian governments to better inform the wider community on the benefits that domestic students, and other sections of our community, derive from this significant revenue stream.

2. Expanding on the above point, our nation's international education community is often vexed by challenges associated with our social licence to operate in the wider Australian community. Some of the misconceptions that abound include: that overseas students are only here to gain migration outcomes; that they take both the university places and the jobs of our domestic students; and that they are involved in some sort of campaign to take over our nation. In response, our Association has long argued that international students need to be overtly championed for what they offer to both our education institutions and Australia. As a thriving multicultural society in an increasingly competitive global environment our nation could position itself so much better. These students offer a significant source of talent to address the social needs of Australia particularly in terms of skills shortages and the development of new knowledge. In this regard, educating the business community to better understand the employment pathways available for overseas students to undertake course related field placements and other employment outcomes will be crucial. Our Association recently updated its [Employability Guide for Australian Employers](#). IEAA also recently invested our reserve funds into an innovative public relations campaign, under the theme of "Helping Australia Thrive", that we hope will help overcome some of the above mentioned wider community misconceptions. This is planned to be launched by the end of June this year.

3. For overseas students another challenge involved in addressing their employability and migration pathway expectations is to overcome the barriers put up by Australia's powerful industry accreditation bodies. These organisations often unilaterally determine levels of English language, duration and number of required field placements and recognition for prior learning. In doing so, they all too often dishearten outstanding international student graduates from proceeding to gain professional recognition. These challenges are raised in the Discussion Paper's Questions 13 and 14. A number of accreditation hurdles from various bodies change all too frequently and serve to restrict the capacity of students to identify and easily fill skills gaps. One example is the different state/territory-based education teacher registration and admission requirements that are challenging for overseas students to understand as there are many differences. Another barrier is that accreditation bodies are often overly restrictive in refusing to recognise previous studies and experience which then unnecessarily forces students to repeat work they may have already studied at a high level in their home countries. It is small wonder then that many overseas students are choosing to move to countries such as Canada where their hard won qualifications are better recognised.

4. Any discussion of skills shortages in Australia must factor in the importance of

supporting our regional communities. Previous Australian Governments have attempted to attract international students to study in our regions through incentives such as an additional year being added to the standard Post Study Work Right (temporary graduate 485 sub-class) visa. One of the unanticipated outcomes of the recent Post Study Work Rights additional duration announcement is that by providing many overseas students with the ability to obtain post graduation full-time work entitlements here for four or five years there may be less incentive to study in our regional communities. While the Federal Government is to be commended for retaining the additional year of work rights for those who study in a regional city (two additional years in remote communities) this might no longer be a major drawcard. The Accord Panel might therefore recommend a more formalised linking of regional development goals with clearer pathways for overseas students to remain/gain migration outcomes in identified communities.

5. The policy diversification envisaged in the above point highlights the need for diversification in other international education delivery policy areas. The Covid pandemic has provided an impetus for Australian education providers to expand their transnational education (TNE) delivery in both online and physical offshore campus modes. Recent research published by Navitas in their 'Global Student Flow Model' highlights that increasing numbers of students might be attracted to study in less expensive study hub countries such as Singapore, Malaysia, Vietnam and even China. Happily, a number of Australia's universities have long established offshore campuses or partner providers in these countries. However, it will be important for our Government and national regulators to better facilitate academic and employment pathways for students who graduate from these offshore delivery modes. Incentives such as the ability to access an Australian experience, including some form of work rights post graduation, will certainly assist here. Of equal importance will be for our Government to engage with offshore Governments in order for them to better recognise excellence in Australia's delivery of full online degrees and micro-credentials. There is currently a significant regulatory burden on any institution to manage the delivery of courses that meet both the Australian and foreign country's regulatory frameworks. The Australian government regulatory framework does not make allowances for the operating environment to be different offshore. These onerous requirements should be reviewed.

6. Question 43 in the Accord Discussion Paper invites suggestions as to how Australia might diversify student enrolments from a wider variety of student source countries. This has certainly been a cause of major concern for many in our nation's

international education community. For example, compared to competitor study destination countries, especially the UK and Canada, Australia recruits very few students from the African continent. We understand that the Navitas Accord submission's reference to their Global Student Flow Model, particularly Figures 2 and 3 "Estimated total global tertiary students by region" and "source countries", highlights our nation's enrolment growth and diversity conundrum. Different Government Departments appear to have a longstanding view that student visa applicants from certain countries are more likely to be non-genuine or to overstay their visas. This perspective then plays into our education providers' concerns that their individual provider risk rating will be compromised if they seek to recruit students who are unlikely to have their visas approved. IEAA recommends that a formalised Roundtable discussion takes place with key officials from relevant Departments to look at options for overcoming these barriers to entry for students from emerging student source countries.

7. In relation to section 2.4 of the Discussion Paper, "International engagement, global security and geopolitical competition", it is important to acknowledge the achievements of both the Federal Government's New Colombo Plan and universities' own learning abroad scholarship and mobility programs. In 2019 fully one in four Australian undergraduate students participated in learning abroad (compared to 16% in USA, 11% in UK and 7.4% in Canada) and 49% of these learning abroad experiences took place in the Indo-Pacific region. This data underpins the fact that "engagement through higher education is helping Australia build our reputation as a contributor to peace and sustainable prosperity". These learning abroad programs are also assisting many of our domestic students to increase their access to Work Integrated Learning (WIL) in direct correlation with section 3.2.4 of the Discussion Paper, "Collaboration with industry". Conversely, significant delays by our Home Affairs Department and national security agencies in the approval process for Post Graduate visa applications from certain countries can reduce our regional standing and compromise collaborative research endeavour. One of the complaints we hear from overseas governments is that, through the NCP outbound mobility program and Australian Awards we are too focused on the Indo-Pacific region. Bringing back a version of the former Government-funded Endeavour Awards would enable us to support merit-based talent from a variety of regions around the globe.

8. As Accord Panel members are well aware, our national economy is currently experiencing major skills shortages across many areas. Our Association has a

strong view that amending the current Genuine Temporary Entrant (GTE) test visa requirement to recognise that genuine students may have a migration intention would send the right messages abroad. Too often we hear of applications being denied because the student has not provided sufficient evidence in their GTE that they do not intend to seek a migration outcome from their course of study. Changing the current visa requirements to focus on ‘genuine students’ while revising processes so as not to penalise applicants who indicate a migration intention will not diminish the integrity of the student visa regime.

Conclusion

There are many other policy changes that our Association is keen to address. For example, the need for greater regulatory oversight of education agents; a greater focus on interculturally trained mental health counsellors; and the need to better support Purpose Built Student Accommodation (PBSA) providers via streamlined local government planning and state/territory government tax relief. However, these are probably not ‘core business’ for the Accord Panel’s deliberations. Fortunately, the Federal Government has encouraged our international education sector to provide evidence and submissions to a number of other relevant inquiries including the current Migration Review and the Joint Standing Committee on Foreign Affairs, Defence and Trade’s Inquiry into Australia’s Tourism and International Education Sectors.