

Objective 1

1. Are there further reforms governments should consider that will improve the quality and integrity of the sector?

- The recent requirement for student visa holders to have an increased amount of savings (i.e \$29,710) has a significant impact on full scholarship holders. Further, we are being advised that economies that are heavily cash-driven, including those in Southeast Asia find it difficult to provide evidence of savings. This is becoming more difficult at the higher rate. Consideration to different mechanisms to evidence this capacity may continue to provide opportunity for international education in these key markets.
- We welcome the development of evidence-based risk indicators but would like to work with the department to identify data sources to ensure accuracy
- We welcome improved transparency of agents and will support the Government in working with our agents to enable this. [REDACTED] works with a number of high quality agents and seeking their perspectives on implementation would be key to ensure they remain active for Australia. We do caution the potential for anti-competitive behaviour should inappropriate information be shared publicly and potential reluctance of agents to participate in the Australian market if this proves cumbersome on their operations. This could present a risk to managed growth or expansion of TNE with agent partners.

2. What more can providers do to improve the integrity of the international education sector?

Objective 2

1. What factors should inform government's approach to allocating international student enrolments across sectors, providers, and locations in Australia?

- Whilst we appreciate that no baseline has yet been formed regarding desired enrolment numbers we would like to position some ideas about this aspect. In 2022 and 2023 we saw significant growth in international student cohorts which was in large part the rebound from the market disruption caused by covid. While this rapid growth has not been evenly distributed, at a national level it could form the new baseline from which to manage growth. Typically, we would expect to see baselines or enrolment caps based upon averages, such as the last 2 years. We are concerned that the 2024 figures are not yet confirmed and yet are realistic of the market now in a post pandemic space. We would be very concerned if forecasts were based on prior years reflecting a disrupted market, nor returning to pre-covid levels be appropriate or consistent with economic need. We would strongly recommend that you consider 2024 as a new national baseline for a fairer and more accurate view of current international enrolments.
- We agree with prioritising the skills needs of Australia but would like this to have a stronger focus on the needs of the state and regions. Each of our universities were established to meet the needs of their state and local communities first, they are our priority, so we request that these needs are put ahead of the national skill shortages. In WA, the support for national and State priorities of AUKUS, the transition and expansion of the resources and energy sectors and our care economy are highly dependent on international students at all levels.
- We strongly support the focus on student experience, as we too seek to deliver an outstanding experience to each and every student. However, we are concerned how this transfers into a metric that is applied to a cap. How will this be achieved? Will it be the application of the QiLT score? We would like to participate in more discussions around this as we believe it should be based upon 1-2 data sources to ensure validity and fairness.

- We support the idea of making better use of our alumni and research networks, but we were surprised that there appears to be an opinion that this is currently not done well. It also appears to come from DFAT who have been leaning into the alumni space for the last 12 months, with Alumni Directors appearing in each of the Australian Embassies. We would like to suggest that DFAT work closely with alumni teams across the sector to fully understand what is already underway as there is a significant number of activities each year. What would be better in this space would be for national networks to be established that are highly visible and are an umbrella for state events in order to raise visibility.
- We are very happy with the positioning that our sector should work within our region – the Pacific and SE Asia – as Western Australia has always sought to position itself as outwards looking into our neighbouring communities due to our geography. We would also like to suggest the government include specific mention of key strategic partners, such as AUKUS members, ASEAN and the USA and incentivise the sector to engage with these countries.

2. What considerations for government should inform the overall level of international students in Australia?

- When considering the overall level of international students in Australia, the Government should take into account the broader contribution provided to the economy. This can be the direct contribution through their living costs and the jobs they fill. Or indirectly by contributing to the investment made into research, student experience and the capacity to invest in infrastructure.
- Prioritising particular programs should include an appreciation that this could be at undergraduate and postgraduate levels, also that many students seek to study a broad range of subjects in their undergraduate program and specialise in postgraduate programs. They should not be penalised nor should broader programs of study be marginalised by caps or other strategies. Could an alternative approach be some kind of incentive rather than by limiting participation?
- We concur that many of the issues identified that the framework is seeking to address arise in Sydney, Melbourne and Brisbane. We would like to see caps that redistribute the international enrolments more evenly across the states and territories. Western Australia has struggled to draw students away from Sydney, Melbourne and Brisbane so we would welcome playing a more significant role in resolving the issues faced in these cities. Perth and more broadly Western Australia has more capacity to support international student enrolments and we have a number of regional campuses well established who could absorb more enrolments with the support from the federal government via incentives to students.

3. How will this approach to managing the system affect individual providers?

- Also missing within the framework is a position regarding 3rd party arrangements, specifically regarding onshore pathway programs such as colleges offering foundation, bridging or diploma programs and English language (ELICOS) programs. Many universities have pathways programs and colleges in partnership with a 3rd party, usually an industry expert such as Kaplan, INTO or Navitas. We would like the framework to position support for these types of agreements, as they are under the auspices of the university, but there is a contractual agreement in place. The university manages these arrangements, has quality assurances in place and manages the risks within the HE Standards and TEQSA requirements.
- Market diversity is important for the sustainability of the international education sector and we recognise the importance of student diversity in supporting the student experience. In establishing expectations for diversity, student experience and support and accommodation it will be important to reflect on the different needs and expectations of these diverse markets, and cohorts at different levels.
- We support the proposal that stewardship of the sector will fall to the Council for International Education however the sector is represented by only 2 university members, one Go8 and one non-Go8. We would like to suggest an expansion of the expert members to ensure more representation from

Western Australia, South Australia, Tasmania and Northern Territory. Currently expert members are from NSW and Victoria hence it perpetuates the issues you are trying to resolve, i.e. uncontrolled East Coast international student numbers.

- Managing to an annual cap may be challenging to implement as the recruitment funnel is quite dynamic. With changing policy, the predictability of final outcomes of commencing numbers will become more difficult. Working to a total number of students within a band over time will be more achievable, and we welcome the indication from Government that a transition period be deployed to support this change. The core element of control for universities in transitioning is commencing students, which needs to be considered as an important factor (rather than looking at total student numbers) in the transition period.

4. Should sectors other than higher education and vocational education and training, such as schools, ELICOS and non-award be included in approaches to manage the system for sustainable growth?

We support the proposal that short programs, such as ELICOS program and articulations, should be outside of the cap. Short programs and Study Tours are wonderful ways to raise our visibility in key markets and the students who undertake these programs of

5. How should government determine which courses are best aligned to Australia's skills needs?

- An important aspect missing from the framework is an explicit position regarding articulation agreements. These are important TNE partnerships with offshore universities which adopt a variety of models, such as 2+2, 3+1 etc and involve international students undertaking their degree in two locations. The curriculum is either the Australia degree program (a form of franchise) or curated partner units that are recognised as equivalent. There is also a component of offshore teaching undertaken by Australian academics in the partner university. We strongly suggest that these types of agreements sit outside of the prospective cap, as they are short programs of study (1-2 years).

6. How should government implement a link between the number of international students and an increased supply of student housing?

- We agree with the government on the importance of having available accommodation for our students, not just for international students but it should be recognised that a growing number of domestic students are seeking a residential experience. Since 2020 in WA, considerable stock of purpose-built student accommodation (PBSA) has been established, with some institutions opening their doors to their own new or expanded facilities. This has provided a cushion for the state in the post-covid rebound. We understand there are further projects in development and in planning that would continue to add to this stock. We would like the government to support us whilst we scale up our commitment to providing accommodation and allow us a transition period to deliver on this undertaking. Many institutions have been planning and embarking on building programs, but this will take 3+years to be operational, some consideration and support is required. We strongly advocate that accommodation includes the contribution to supply that PBSAs offer and institutional contractual arrangements with PBSA providers when the government considers student accommodation ratios and caps.

7. What transition arrangements would support the implementation of a new approach?

Acknowledging the recruitment pipeline is 6-8months ahead on teaching semesters, we would appreciate a 12-18months transition period to bring our enrolments in line with our cap.

Objective 3

1. What are the barriers to growth in offshore and transnational delivery of Australian education and training?

- There is a strong focus on supporting the sector to engage in TNE and it is a position we wholly support. However, as you would be aware, the sector is quite diverse in its approaches to TNE and some institutions are further ahead on this pathway than others. An observation is that to compare individual institutions based on their TNE activities, specifically offshore campuses, is limiting. What is not clear in the framework is an appreciation of the fact that the majority of offshore campuses and other TNE activities are arrangements with 3rd party providers. Very few are done solely by an Australian institution, so it would be good to understand the governments view on these arrangements and how it will continue to support their development.

2. Where can government direct effort to support transnational education?

- We recognise the Government's strong support for innovative education models. The current agreement with India and their part in this is a great example. We would encourage enhanced diplomatic effort toward fast-tracking recognition of Australian degrees within priority TNE markets and for the removal of any barriers to student participation in TNE programs such as limitations on online learning. Deeper participation by Government in the identification, validation and testing of opportunities (through Austrade or other agency/expertise) in addition to investment incentives is likely to encourage more active TNE participation.
- We would like to see the government support the following TNE activities via regulatory changes and incentives; franchise agreements, twinning and online delivery which in turn will also assist regional Australia and the needs of regional communities. Currently there are restrictions on how much of a course can be delivered, franchised or partner-delivered. A revision of these rules would enable the vision articulated in the framework.