

Objective 1

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

I started out as an English language teacher in 1990 so I've been in the industry for over 30 years; I am now the owner and principal of an ELICOS only college.

I have chosen not to deliver VET at our college because my focus has always been on high quality English language teaching and I have an issue with many, though not all, VET programs, being of poor quality and/or not relevant to the skills needs of either the student or the country.

Over the last decade there has been a proliferation of poor quality programs that cater to international students whose primary focus is to work, rather than study. These programs are cheaper and have less attendance requirement (if any), when compared to ELICOS so are more attractive to an onshore cohort who prefer to work than study.

I would therefore recommend the following:

1. The government enforce the requirement for students to complete their principal course before transferring to another provider. This is already a requirement but since Covid, it seems to be being overlooked.
2. Charge progressively higher student visa application fees for the second (onshore) and subsequent extensions – this would make students think carefully about whether or not to extend into such courses.
3. Shorten the appeal process because there are many onshore students who feel that it's worthwhile to pay for an appeal if their visa application is refused and stay on a Bridging Visa as it currently can take around 12 to 18 months to process. Many of these students study the cheapest courses available while on the bridging visa because their goal is to just work as long as they can.

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

I believe the quality and integrity of ELICOS, at least at ELICOS-only colleges, is already high, and certainly higher than most VET courses delivered to international students in this country. ELICOS is a unique product and shouldn't be confused with VET, though I think governments have frequently made this mistake.

For example, ELICOS has the requirement to teach a minimum of 20 hours per week face to face, unlike VET colleges, which don't have to deliver anything like this for their courses. As a result, our costs are much higher than VET because we have to pay teachers to teach longer. (Not to mention requiring far more space when leasing premises (maximum of 18 students per class).

Furthermore, students at ELICOS colleges have to have an attendance of 80% or higher, otherwise they run the risk of being reported. Again, VET has nothing like this kind of requirement.

Therefore, international students, whether studying ELICOS or VET, when extending in this country, almost always choose the latter because:

1. The courses are cheaper than ELICOS; and
2. They don't have the same attendance requirements; therefore, they can work longer than if/when they're studying an ELICOS course.

As a result, given the smaller class sizes and the attendance requirements that ELICOS must adhere to, I believe that the quality of our programs is already, generally speaking, quite high and certainly higher than those of VET.

Objective 2

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

Setting the overall level of international student enrolments into ELICOS courses, or any other program in Australia is unprecedented in this country and frankly, not required in my opinion because the level of students is already falling dramatically, especially for ELICOS.

I believe that by the government's own estimates, for the financial year 2024/25, NOM levels are forecast to fall to around 250,000 so I'm not sure why the government has to cap students in ELICOS courses because with regard to my college's student numbers at this time, they are already 33% lower than for the same time in 2019 (pre-Covid) following the government dramatically increasing the rate of refusals for offshore student visa applications for ELICOS only programs.

For sustainable growth, I think it's more important for the government to regulate the quality of the courses that receive CRICOS registration or existing courses with CRICOS.

I think this would consequently regulate the number of students who enter courses without the need for some artificial allocation of students to sectors and regions.

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

Regarding ELICOS, I don't think there needs to be consideration of the numbers of international students because I believe the industry was already growing at sustainable levels before the government implementation of the Migration review.

Furthermore, most students in our sector return home once their ELICOS studies are completed.

The majority of our students also stay with our homestay families so I believe there is minimal impact on students supposedly taking rental accommodation from Australians, as often highlighted in the media. (The Treasurer's already admitted as much.)

For VET, again, I think it comes down to improving the quality and relevance of the courses being taught, rather than imposing an artificial "level" on international students.

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

ELICOS only providers have already been severely affected by the government's actions. We are often referred to in the international education sector as, "The canary in the coal mine," because we are generally affected sooner than anyone else, as was the case during Covid.

In 2024, I have already had to lay off several staff and entered into protracted and frankly, unpleasant negotiations with my landlord owing to the dramatic and unexpected decrease in student numbers we're experiencing this year.

I had to let go most of my staff during Covid because of the closed border and the international students who were here, chose cheap, low quality VET programs over our more expensive ELICOS courses.

I am frankly angry and disillusioned that after letting go so many staff during Covid, then fighting hard through 2022 when students returned to either entice former staff to return to work or train new staff, that I am now forced to start letting them go again, through no fault of my own, not to mention the threat my business now faces to survive.

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?

As I mentioned above, I don't believe so because if you look at the growth in ELICOS over the last decade, it has been quite sustainable, even bordering on anaemic at times.

In 2022, as we all know, there was a very large intake of students but this wa

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

I'm not really a VET expert but I would recommend extensive consultation with the industry because not a lot of that has happened of late.

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

I don't see any reason for the government to go down this path.

Firstly, the Federal Treasurer has already admitted that the effect international students have on the housing market is, "... at the margins, as best" I believe were the words he used.

Furthermore, the Property Council of Australia also published a study in which they said international students only take up about 4% of available accommodation in this country.

Thirdly, I believe it will take literally years for purpose-built student accommodation to go from approval stage to ground being broken.

However, at least in the case of ELICOS, our college has over 100 homestay families to whom we send students. If the government really feels they need to link accommodation availability with students levels, homestay accommodation must be considered for smaller colleges.

But again, I would like to re-iterate that I don't believe there needs to be a link between international student and student housing.

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

I don't really have any comments to make on this except to again recommend extensive industry and government consultation to try, as far as possible, to avoid what we are currently experiencing.

There have been no transition arrangements for the ELICOS sector when the government refused student visa applications in January at the rate of 50% - our revenues have gone into freefall since in addition to paying out tens of thousands of dollars in refunds to students who either had their applications refused, or, having enrolled and paid for their courses, chose to cancel before applying for a visa in order to avoid losing their \$710 student visa application fee.

By all accounts, New Zealand and the US have been the major beneficiaries of the government's actions to date.

Objective 3

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

I think this is a question for the HE sector, rather than ELICOS.

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

