<u>**Objective 1**</u>

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

One potential improvement would involve expanding the grading system for visa providers to include more levels, reflecting their risk profile and track record of visa refusals. This nuanced gradient would determine the speed and priority of the visa issuance process. The current three-tiered system lacks granularity. By incorporating additional levels, perhaps considering the provider's history and positive outcomes for students over time, particularly those with extensive experience, the system could better assess and prioritise visa applications. The Education Provider Report serves as a monitoring tool for Registered Training Organisations (RTOs). The Tertiary Education Quality and Standards Agency (TEQSA) oversees the reporting process. Similar to migration agents, educational agents are subject to regulation and verification procedures. Risk levels associated with these agents are made transparent to RTOs, enabling informed decision-making and risk mitigation strategies. Much like the ASQA 'Tip Off' report, TEQSA also needs to have a similar mechanism where unethical Providers can reported.

VISA DELAYS - As mentioned above a review is needed on the current Provider Risk Rating in order to assist with speeding up the process. This rewards those Providers operating in the right ethically. Fairness to quality, long standing providers vs to allocation and opportunity handed out to Universities and new providers.

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

Ensuring the integrity of marketing practices and compliance with regulations, the verification of agents and third-party providers is paramount. In order to maintain high standards of integrity, the government should aims to enhance support for providers through improved and streamlined processes. By doing so, the government should aim to sustain the integrity levels upheld within the industry.

<u>**Objective 2**</u>

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

The SCOL list, or Skilled Occupation List, necessitates a reassessment to ensure equitable allocation, particularly favouring regional areas. Recognising longevity as a corporate citizen within the market is essential. It's acknowledged that factors such as regional dynamics may evolve over time. Consequently, additional consultation with longstanding market participants is advised to incorporate their perspectives effectively.

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

Several considerations should inform the Australian government's approach to determining the overall level of international students in the country:

1. Economic Impact: International students contribute significantly to Australia's economy through tuition fees, accommodation, and living expenses. Therefore, the government must balance the desire for economic growth with other social and economic factors.

2. Education Quality: Maintaining high-quality education standards is crucial. Overcrowding of classrooms or universities with too many international students could potentially compromise the quality of education for both domestic and international students.

3. Cultural Exchange: International students contribute to cultural diversity and understanding within Australian universities and communities. The government should consider the positive impacts of cultural exchange on society and promote initiatives that foster cross-cultural understanding.

4. Labor Market Impact: The government needs to ensure that an influx of international students does not negatively impact the domestic labor market. This involves monitoring student visa regulations to prevent exploitation and ensuring that international students have fair access to employment opportunities.

5. Infrastructure and Resources: Adequate infrastructure and resources must be in place to support the needs of international students, including accommodation, healthcare, transportation, and academic support services.

6. Social Integration: Encouraging social integration between international and domestic students can enhance the overall university experience and contribute to positive relationships between different communities within Australia.

7. Global Reputation: The overall level of international students can affect Australia's reputation as a desirable destination for education. Striking a balance between attracting a diverse student population and maintaining academic standards is essential for preserving Australia's reputation as a top-tier education destination.

8. National Security: While international students enrich Australian society, the government must also consider national security implications, particularly concerning students from countries with geopolitical tensions or security risks.

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

By considering these factors comprehensively, the Australian government can develop policies that support sustainable growth in the international student sector while also safeguarding the interests of domestic students and the broader community.

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 believe there is no need to limit at this stage. While schools, ELICOS, and non-award programs certainly have their merits, they may not be as directly tied to economic growth and workforce development as higher education and vocational training. There

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

Consultation with industry stakeholders and relevant associations should be prioritised before designating areas as at risk of removal. This includes soliciting input from these entities on proposed policy changes, particularly those affecting job opportunities and required skills. Additionally, before implementing any changes, there should be a review process to allow for sufficient time for stakeholders to adapt and for policy adjustments to be implemented effectively. This extended timeline would afford providers the opportunity to modify their product scope accordingly. Moreover, long-standing providers should have a seat at the table during key discussions, ensuring their valuable insights and experiences are considered in decision-making processes.

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

The link between housing and the number of international students should be carefully managed, particularly to avoid unintended consequences that may negatively impact students. In instances like those in Canada where Providers must have systems implemented to provide student housing and meet requirements, it's crucial to consider the broader implications on student welfare and access to essential services. We do not want to have a situation where unethical Providers build student accommodation that is unsuitable for students. Therefore, while consultation is vital for informed decision-making, policies should prioritise student well-being and equitable access to resources.

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

Effective transition arrangements are crucial to ensure its successful implementation. Firstly, a detailed timeline outlining key milestones and phases should be developed, allowing stakeholders to anticipate changes and prepare accordingly. Clear communication channels should be established to disseminate information and address concerns throughout the transition period. Providing training and resources to support stakeholders in understanding and implementing the new framework is essential. Additionally, mechanisms for feedback and evaluation should be incorporated to assess the effectiveness of the transition and make necessary adjustments. Overall, prioritising proactive planning, communication, and support will facilitate a smooth transition to the new Education Skills Strategic Framework.

Objective 3

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

Australian providers wishing to establish transnational education arrangements face significant cost, commitment of resources, and exposure to a wide range of risks, all acting as barriers to growth in offshore and transnational delivery of education. These include:

- a significant, ongoing, and organisation-wide commitment of human resources to design, develop, implement, and review these arrangements;

- uncertainty or lack of clarity relating to compliance with regulatory requirements;

- ongoing operational, legal, regulatory, intellectual property risks; and

- any investment in building and/or IT infrastructure.

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

Australian providers wishing to establish transnational education arrangements face a wide range of upfront costs, commitment of significant internal resources, and exposure to non-negligible operational, legal, reputational and regulatory risks.

Government should support Australian education providers entering into such arrangements by:

- substantially increasing the number of bilaterial agreements with other countries facilitating education partnerships;

- establishing government-industry partnerships to develop innovative best-practice transnational education models, guidance, and networks, and to identify target country market needs and opportunities for curriculum alignment to those needs;

- through Australia's representatives in target countries, providing market intelligence reports and data on potential transnational education markets and opportunities and facilitating networking between potential partners;

- providing funding for Australian providers to establish transnational education arrangements for defined markets and qualifications in targeted countries;

- establishing clear standards and guidelines for compliance with Australian higher education regulations while supporting innovation;

- recognising the value of Australian providers delivering offshore and/or transnational education, including in regulatory assessments of the quality of the services delivered by the provider.