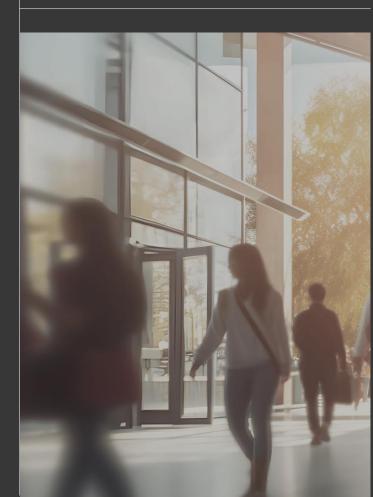


Australia's International Education and Skills Strategic Framework

Business Council of Australia Submission

July 2024



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1. Overview

The Business Council of Australia (BCA) welcomes the opportunity to comment on the draft International Education and Skills Strategic Framework (the Framework). The Business Council represents around 130 of Australia's major corporations and eight of Australia's top universities. Together they employ over 1.1 million people. A skilled and diverse workforce and a well-targeted migration program are essential for all businesses, the people they serve and for the prosperity of Australia.

The international student sector is our fourth largest export industry, worth \$48 billion in 2023. It provides considerable income for businesses, delivers higher revenues to governments, supports universities to offer high-quality education for domestic students, is critical to maintaining our research capacity, and is a major channel for soft diplomacy, especially in the Asia-Pacific region.

The BCA is broadly supportive of the key themes in the Framework. However, the international student enrolment limits proposed via amendments to the *Education Services For Overseas Students Amendment* (Quality and Integrity) Bill 2024 (the Bill) will undermine these policy objectives, risk politicisation and have unintended consequences that could derail the reform principles of the Australian Universities Accord.

Through provisions to build additional housing for international students, the Framework links this cohort to Australia's current housing and infrastructure pressures. But the housing crisis has not been caused by international students. Poor regulation, failed planning, skills shortages in construction and high building costs have reduced new housing on the market. No new houses mean higher prices and fierce competition for quality accommodation. These are factors beyond the control of the universities, as evidenced by their attempts to build accommodation being blocked by local councils.

If we are to solve the housing crisis, we need to get to the core of the problem. Short term policy responses such as a cap on international student numbers will not fix the issue, will detract from real solutions and have negative consequences for the broader economy.

Australia is currently experiencing some of the worst skill shortages in its history. One in three occupations had worker shortages in 2023¹. New and expanding sectors such as the net zero transition, defence, including for AUKUS, construction and manufacturing, and the growing need for care and digital skills have led to labour pressures across the economy. The university and Vocational Education and Training (VET) sectors are critical to ensuring Australia can reduce these gaps and should be supported to provide quality education to all.

International student revenue is essential for research efforts and the teaching of domestic students. A blunt cap on international student numbers will place these activities at risk. Unless significant additional Government funding is planned for the sector, a cap will also limit universities' ability to meet the Government's ambitious equity and attainment targets, as set out in the Australian Universities Accord.

The Government has undertaken a major review on migration that is now being implemented. This revised and more targeted strategy is the right approach to addressing concerns regarding Australia's migration intake.

The BCA recommends the Government reconsider managing growth in international education. Ensuring integrity and diversity of the sector has merit and should be vigorously pursued. This will remove unscrupulous providers and poor-performing students and improve the overall quality of international education – effectively shrinking the sector without damaging the economic benefits it brings to the country. Home Affairs' focused action in this area is underway as part of the Migration Strategy and international student numbers have already dropped 36 per cent from this time last year.

¹ Jobs and Skills Australia, Skills Priority List 2023



2. Key recommendations

- 1. The Government reconsider capping international student numbers and moving away from a demand-led system to 'managed growth'.
 - Remove the international student enrolment limit amendments (Part 7 and Part 8) from the Education Services for Overseas Students Amendment (Quality and integrity) Bill 2024 (the Bill).
 - Do not undermine a major export revenue source in which Australia is globally competitive.
 - Do not take actions that would cut funding for research and support for Australian students (unless the government guarantees to make up the funding gap).
- 2. The Government recognise the role of international students in enhancing Australia's reputation and fostering relations with the region.
 - This principle is at risk with the international student enrolment cap amendment in the Bill.
- 3. Cease linking international student numbers to the broader housing crisis, noting the mismatch with the annual cap cycle and construction lead times will not solve the current crisis.
 - Remove references to housing provisions from the Bill's Explanatory Memorandum and the Framework.
 - The Migration Strategy being the appropriate vehicle for addressing broader concerns regarding overall immigration numbers
 - Create a national reform fund that makes payments to states and territories to incentivise them to improve productivity through reform measures, including reforms that would unlock more homes.
- 4. The Government should focus on protecting the quality and reputation of Australia's education sector by targeting unscrupulous providers.
 - This is the most effective and appropriate method to reduce student numbers in the sector.
 - Exclude the highly regulated university and TAFE providers from additional integrity measures and instead focus on less well-regulated providers that have not demonstrated their long-term viability and quality.
- 5. If the Government persists with a managed growth approach to international education, set enrolment limits via mission-based compacts between individual universities and the Department of Education or the Australian Tertiary Education Commission, as recommended in the Universities Accord.
 - When setting international student caps, each university's financial position, employment profile and infrastructure costs should be considered.
- 6. Remove the ministerial powers to set international student enrolment limits at the course and location level.
 - Government should seek to better align international student expertise and Australia's skills requirements through migration policy, rather than setting caps at the course level.
 - Incentivise international students to study in regional areas, rather than removing choice via location caps.



3. Preserving Australia's fourth largest export

The BCA broadly endorses the key principles in the Framework that seek a high-quality and diverse international education sector with strong links to our region and beyond.

However, we have deep concerns with the Framework's 'managed growth' approach and its implementation through proposed amendments in the Bill that grant ministerial power to impose limits on international student numbers (Part 7 Enrolment Limits and Part 8 Automatic Cancellation of Specified Courses). Caps on international students will undermine the policy objectives of the Framework, could hurt our reputation as a higher education destination of choice and could irreparably damage our fourth largest export sector.

The Bill will enable the Education Minister to make a legislative instrument specifying the number of international students that may be enrolled at an institutional level (total provider enrolment limit) and at the course or class level (course enrolment limit). In setting enrolment limits, the Minister will consider the relevance of courses to Australia's skills needs, within a context of managed growth.

As currently drafted, the Bill is a blunt instrument that undermines the Framework's quality, integrity and diversity principles. The Bill, if passed by Parliament, will grant powers to a minister well beyond what had been proposed in the Universities Accord and the Migration Strategy, to which the BCA made several submissions and was supportive of the Government's response.

The BCA recommends the Government not place caps on international student numbers and remove the international student enrolment limit amendments (Part 7 and Part 8) from the Bill.

We firmly believe the Accord – which was the most significant review of the long-term future of the sector in a decade – should guide the direction of growth and prosperity of our vital higher education sector. The managed growth principles in the Framework and Bill amendments represent a reaction to public concerns over housing supply and the overall migration numbers that will not address the fundamental sources of the problem.

Considering the undeniable benefit of higher education and international students to our economy – especially at a time of critical skills gaps, persistent inflation and flagging productivity – the BCA believes it is undesirable to 'manage growth' in this demand-driven sector. Cutting university funding (through capping a major revenue source) with no additional funding will undermine the higher education sector.

Universities and the tertiary sector are central to Australia's economic and social progress. They train Australia's future workforce and drive new industries through innovative research. They support our relationships with other countries through international students and collaborations with overseas institutions. As stated in the Framework, universities are integral to Australia's soft diplomacy, global reputation, and contribution to capacity building in emerging economies.

Universities' ability to create and disseminate new knowledge and ideas is one of their greatest values to society. Countries that spend a higher percentage of GDP on higher education research and development have on average higher levels of GDP per capita. Our universities rely on international student fees to fund research, especially in the absence of Government funds.

The presence of international students in our universities also enriches the educational experience of all students. A high-quality Australian education benefits our global community, as international students return home powerful champions for Australia. According to Universities Australia, international university students contribute around \$73,000 each year in export revenue, while students in vocational education and training contribute \$34,000.

Australia excels at international education. The sector brought in \$48 billion in export dollars in 2023, employed around 200,000 people, and many more at the margins. Student fees represented \$17 billion, or around 36 per cent of all international student exports. The goods and services consumed by international students were \$31 billion, or around 64 per cent of all international student exports – up from around 56 per cent a decade ago.

International students accounted for almost a quarter of all GDP growth over the year to March 2024. International student exports were 7.1 per cent of all exports in 2023, up from 5.0 per cent two decades ago. But as a share of all exports, the sector has not recovered to its pre-COVID peak.

Figure 1: Education exports \$b % of all exports Total —Fees —Goods and services

Case study: Woolworths and International Students

Woolworths is one of Australia's largest private sector employers with over 176,000 staff across Australia. This includes around 5,700 team members who hold student visas at Woolworths Supermarkets, BIG W Discount Department stores and supply chain operations.

International students are valued members of Woolworths Group store and supply chain teams. This was especially the case at the height of the pandemic when low unemployment and high workforce participation resulted in acute shortages in the labour market.

Post-COVID, tangible and pragmatic commitments made by the Government to continue flexibility for student visa holders has meant they can continue making a strong contribution to the business and serve 20 million Australian customers every week.

International students make sure the supermarket shelves are stocked and supply chains can operate efficiently, filing a key gap that remains in Australia's labour market.

3.1 The economic imperative of international students

International students are – and always will be – a key part of universities' funding model. Fees from international students represent the second largest amount of overall university revenue (around \$8.6 billion in 2022)². With operating costs increasing around 25 per cent over the past decade, universities have had to fill the gap that has not been met by Government to educate Australians and keep their funding steady. Further cuts to such revenue without additional funds from Government will likely lead to reduced services for Australian students.

Australia has seven universities in the top 100 global rankings. Making it into the top 100 requires a world-class research program, given how rankings are calculated. It is this ranking that lifts the quality of education for Australian students, while making our universities a much-desired destination for overseas students.

However research is expensive, and it is the revenue from international students that substantially funds this work. Less students means less revenue and therefore less research, and a consequential drop in the global rankings and potentially as an educational destination of choice. This cascading effect would lead to a major funding shortfall, Australia becoming less competitive in global standings, and ultimately increased pressure for the Government to bridge this funding gap. In the absence of government funding, significant job cuts are inevitable.

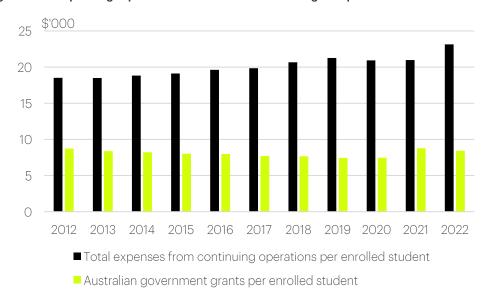


Figure 2: Total operating expenses and Australian Government grants per enrolled student 2012-2022

Recommendation 1

The Government reconsider capping international students and moving away from a demand-led system to 'managed growth'.

- Remove the international student cap amendments (section 7) from the Education Services for Overseas Students Amendment (Quality and integrity) Bill 2024.
- Do not undermine a major export revenue source in which Australia is globally competitive.
- Do not take actions that would cut funding for research and support for Australian students (unless the Government guarantees to make up the funding gap).

² Department of Education, *Finance 2021: Financial Reports of Higher Education Providers Summary Information*, Department of Education, Australian Government, 2023.



4. International students and the housing crisis

The BCA strongly advocates for a holistic migration strategy that integrates infrastructure and housing policies. This strategy must be evidence-based and forward projecting so appropriate planning and funding can be made available. The Government is implementing its Migration Strategy after a detailed review and this should be the key mechanism by which immigration numbers are addressed.

We are supportive of the Government's focus on delivering more dwelling supply to address the nation's housing needs. As our 2023 paper 'Housing Australia's Talent' showed, there are multiple factors that have impacted housing affordability. These include changes in dwelling size and composition (the number of people sharing a home), as well as the quantity of new housing being brought onto the market to meet demand.

The requirement for universities to provide new housing for international students if they choose to go over their designated cap is a fundamental pillar of the Framework. While there is no mention of housing in the Bill, the Explanatory Memorandum states that "The Minister may also give a notice to a provider under subsection 26C(1) if satisfied that the provider has demonstrated that they have developed, or otherwise made available, additional student accommodation to cater for an increase in student enrolments"³.

The debate over international students arises as a consequence of housing supply issues. The requirement to provide additional accommodation for this cohort sends a strong message that international students are a major contributor to the housing crisis. But evidence is contrary to the commentary.

According to Government data, there were around 786,000 international students in Australia last year⁴. That is less than 3 per cent of the nation's total population. It is not far off pre-pandemic levels, when international student numbers were around 756,000 in (2019)⁵. Noting that study visa approvals have dropped around 36% this year from the same period last year⁶, the international student housing footprint will be even smaller.

International students made up around 4 per cent of the rental market in 2021⁷. While this may have changed following the pandemic, it represents only a small share of rental supply. Moreover, international students usually live in apartments and purpose-built student accommodation⁸. This differs from the preferences of families and domestic students, further narrowing the impact of international students on the housing market.

The BCA recognises the value in ensuring international students are provided with appropriate housing. The universities already, and will continue to, make available significant housing opportunities for students. But a plethora of external factors make annual cap setting and long-term housing development a difficult pairing.

New housing supply is impacted by many factors. These include zoning and planning systems, which are urgently in need of reform across all jurisdictions, and the financial feasibility of new housing in terms of financing, labour, materials and government charges. State Governments are reforming planning systems, though many face opposition from vocal anti-housing groups who are resistant to new homes in their well-established neighbourhoods.

Our university members have also experienced significant barriers to building new student housing, due to restrictive state and local regulations. Most recently, UNSW had its plan for a 1066 room housing development opposed by Randwick Council after a year of negotiations⁹.

⁹ The Guardian, <u>Tough assignment: Australian universities are desperate for more student housing, but not everyone's on board'</u>, Lenore Taylor, 9 June 2024.



³ Education Services for Overseas Students Amendment (Quality and Integrity) Bill 2024, Explanatory Memorandum, pg 61.

⁴ International student numbers by country, by state and territory - Department of Education, Australian Government

International student numbers by country, by state and territory - Department of Education, Australian Government

⁶ Around 86,000 study visas were granted to offshore applicants from January through May this year (a nearly 36% decline from 135,000 granted in the same period in 2023).

⁷The Student Accommodation Council, 'Myth busting international students' role in the rental crisis', April 2024

⁸ The Student Accommodation Council, Myth busting international students' role in the rental crisis'. April 2024

The BCA's position is that we must tear down the barriers to housing supply at a state and territory level, rather than impose impossible requirements on universities to solve the housing crisis. The universities do not have control over housing, so putting the responsibility on them will only distract from achieving real outcomes.

Instead, the Federal Government should create a national reform fund that makes payments to states and territories to incentivise them to improve productivity through reform measures, including reforms that would unlock more homes.

Recommendation 2

The Government should cease linking international student numbers to the broader housing crisis, noting the mismatch with the annual cap cycle and housing approvals and construction lead times.

- Remove reference to housing provisions from the Bill amendments Explanatory Memorandum and the Framework.
- Create a national reform fund that makes payments to states and territories to incentivise them to improve productivity through reform measures, including reforms that would unlock more homes.

5. A sustainable international education sector

The BCA is highly supportive of the elements in the Framework and the Bill that improve the integrity of the international education sector. It is essential that Government regulates to stop dishonest education providers from exploiting our visa system. We should focus on market development and recruitment of high-quality students and take action to remove access for non-genuine students, especially where this is occurring through some poor-quality offerings in the VET market.

Shutting down unscrupulous providers will go a long way to reducing student numbers. The BCA recommends the Government focus its efforts as this is as a far more effective mechanism than setting caps on university and TAFE enrolments. We note that this focused action is underway as part of the Migration Strategy and by Home Affairs. Visa numbers are already declining significantly with a 36% drop in study visas granted this year compared to the same period last year¹⁰.

Enrolment caps would then only be considered as a last resort, if the Government's integrity approach fails to bring the numbers down to acceptable rates.

We also recommend the Government focus integrity reforms on providers that have not demonstrated their long-term viability and quality. Universities and TAFEs, which already adhere to extensive Government legislation and regulations, should not be subject to additional integrity measures. By excluding universities and TAFEs from the additional integrity measures in the Bill, regulators can focus on unscrupulous agents, disreputable providers and non-genuine students.

Recommendation 3

The Government should focus on protecting the quality and reputation of Australia's education sector by targeting unscrupulous providers.

• Exclude the highly regulated university and TAFE sectors from additional integrity measure in this Bill and instead focus on less well-regulated providers that have not demonstrated their long-term viability and quality.

5.1 Sector-managed growth

If the Government persists with an interventionist managed growth approach to the international student sector, the BCA recommends that a more effective and appropriate method is via mission-based compacts between individual universities and the Department of Education or the Australian Tertiary Education Commission (ATEC), as recommended in the Universities Accord¹¹.

The compacts could include equity and domestic attainment targets that suit each institution and the communities they serve. This would ensure international students complement Australia's broader migration strategy, while implementing major higher education sector reforms, as agreed by Government.

In setting caps, the Department should consider the broader implications for running complex organisations such as universities. As stated above, universities have experienced a long-term decline in Government investment, particularly in infrastructure and research, and have come to rely on full fee-paying international students' tuition fees to deliver their core functions. Australia spends just 1.68 per cent of GDP on research,

¹¹ Australian Universities Accord Final Report, December 2023, pg 203



¹⁰ Around 86,000 study visas were granted to offshore applicants from January through May this year (a nearly 36% decline from 135,000 granted in the same period in 2023). Department of Home Affairs, <u>Student Visas Granted Pivot table</u>

compared to the OECD average of 2.24 per cent¹². The plummet in international student numbers (and corresponding fees) during COVID-19 left many universities in the red and some have yet to rebound¹³.

Given universities' reliance on international student fees in the absence of additional Government funds, the BCA recommends international student caps be considered within the context of the post-pandemic recovery and the university's current and projected financial position.

Recommendation 4

If the Government persists with a managed growth approach to the international student sector, set caps via mission-based compacts between individual universities and the Department of Education, as recommended in the Universities Accord.

• When setting international student caps, consider universities' financial position, employment profile, infrastructure costs and other obligations associated with running complex organisations.

¹³ Australian Universities Accord Final Report, December 2023, pg 141



 $^{^{12}}$ OECD Data – <u>Gross domestic spending on R&D</u>

6. A diverse sector that supports Australia's skills needs

Australia is facing some of the worst skill shortages in its history. New sectors such as the net zero transition, defence including AUKUS, construction and manufacturing, and the growing need for care and digital skills have led to labour pressures throughout the economy.

The Framework suggests that international student enrolments should better align with Australia's skills needs. This is supported by provisions in the Bill enabling the Minister to set enrolment limits at the course level, in an attempt to herd students into courses that would fill skills gaps.

International students play a small role in filling some skills gaps, particularly in STEM and cyber where we do not have enough graduating Australian students. However, the vast majority of international students return home after studying. Restricting their course choices may be effective in some core areas, but overall it will have a minimal impact on the Australian labour market.

To put it in context, only around 24 per cent of international students use their post-study work rights¹⁴, and just 16 per cent become permanent residents¹⁵. That is why the Migration Review sought to lift the number of skilled students staying in Australia to fill short term employment needs.

We are supportive of finding new ways to encourage highly skilled international students to enter the Australian job market and become permanent residents. This includes providing international students with access to work integrated learning to prepare them for the Australian workforce.

However, we suggest that migration policy is a far more effective mechanism for addressing immediate skills gaps than setting course quotas via the ESOS Bill.

The BCA recommends removing the provisions to set international student caps at the course level. Attempting to force students into skills gap areas rather than their course of choice will only lead to dissatisfied international students and persistent skills gaps.

6.1 Diversification

The Framework claims that concentrations of students in courses and locations and the lack of diversity of source countries have been persistent issues in the Australian international education sector.

The top five international student countries of origin are China, India, Nepal, Vietnam and Colombia. Our biggest source countries by far are China and India, with our largest neighbours offering a healthy market of quality students.

The BCA supports the broad principle of a diverse and sustainable international education sector that is resilient to market shocks and geopolitical disruption. However, we assess that caps on international student numbers will lead to a less sustainable and diverse education sector and will undermine the core principles of the Framework.

The Framework emphasises the important diplomatic value of students coming from the Indo-Pacific. The proposed caps run counter to this strategy. The increase in students from India has been an extremely positive development in strengthening relations between the two countries. Fostering closer education linkages is an important part of the work the BCA is undertaking through the Australia-India CEO Forum, with a key working group focused on building these ties to the benefit of both countries.

In addition, to avoid the proposed harsh breach penalties, universities will likely raise entry requirements to scale back international student applications. This will make it even harder for applicants from smaller, less represented source countries to gain entry, and Australia's reliance on major source countries such as China and India will

¹⁵ Pathways to permanency | Australian Bureau of Statistics (abs.gov.au)



¹⁴ Review of the Migration System (homeaffairs.gov.au) page 110

grow. Looming caps will also remove the certainty needed to engage other governments and expand recruitment into new countries.

The Framework suggests education providers look to Latin America to expand their source markets. While this may have potential, it will be costly. Universities have spent decades and significant investment to build their reputation in the Indo-Pacific. To pivot to another area will take significant time and resources, yet the enrolment cap policy would result in less revenue to support such activities.

The Framework also raises concerns about the concentration of international students in metropolitan areas, noting most onshore international students study in Sydney, Melbourne and Brisbane (approximately 70 per cent of 2023 enrolments)¹⁶. The provisions in the Bill to set caps based on location and course are aimed at funnelling students into regional universities and into courses considered a labour market priority.

As discussed above, efforts to shape student choice through caps will fail. If a student wishes to study accounting in Sydney but is more likely to receive an offer if they study nursing in Wagga Wagga, chances are they will simply apply to study in London or San Fransisco.

The BCA recommends the Government recognise the unintended consequences of enrolment limits that will lead to a less diverse and sustainable sector. Rather than removing student choices via caps – which will only lead to fewer high-quality students selecting to study in Australia – the Government should provide incentives to attract students from non-traditional source countries and for students to study in regional areas.

Recommendation 5

The Government should remove ministerial powers to set international student enrolment limits at the course and location level.

- Government should explore alternative methods of better aligning international student expertise and Australia's skills requirements through migration policy and incentives, rather than caps at the course level.
- The Government should incentivise students from diverse source countries to study in Australia, and international students to study outside of metropolitan areas.

¹⁶ Australia's International Education and Skills Strategic Framework, pp 18



Australia's International Education and Skills Strategic Framework

7. Strengthening and deepening our international relationships

The Framework highlights the tremendous in-roads and positive impact of Australian universities' transnational education, onshore campuses and partnerships in our region. Our universities have contributed to a more informed, peaceful, prosperous and resilient region – international education is a powerful tool for regional influence. We support the Framework's focus on international recognition of Australian qualifications.

However, developing transnational education offerings is time-intensive and costly. And there is limited Government support to assist universities to grow their offshore presence.

The BCA is concerned by the Framework's implication that universities can offset cuts to onshore international student fees by increasing their online and offshore delivery. Educating students in their host countries has much lower margins than onshore delivery, and international student fees often subsidise this offering. Establishing offshore campuses requires significant upfront investment and usually long lead times negotiating regulatory requirements with the host nation. It is unrealistic for Australia's universities to substitute one delivery method for the other and maintain their bottom line.

The BCA recognises and is highly supportive of efforts to strengthen ties with our closest neighbours. As already reference, the BCA hosts the Australian Secretariat for the Australia-India CEO Forum and has recently presented 54 draft recommendations to the Australian Government on ways to increase and improve bilateral trade and investment. The CEO Forum Education Joint Working Group with India recognises that a bilateral focus on education is not only important for global employability but is essential in soft diplomacy.

But Indians have borne the brunt of the recent study visa slowdown and higher rejection rate. Indian nationals experienced a 32% visa rejection rate in 2023-2024 (until April 2024), compared with 21% pre-COVID in 2018-2019¹⁷.

The proposed caps, and the direct impact they have on Indian students, come at a time when Australia is attempting to strengthen its economic and investment relationship with India by negotiating the Comprehensive Economic and Cooperation Agreement (CECA).

We have heard from our CEO Forum partners that India is deeply concerned about proposed changes to international student requirements and enrolment caps. The Indian Government, Indian universities and Indian parents are sensitive to these decisions.

The Government must recognise the negative message setting caps on international students sends to the world. Restrictive policies and harsh rhetoric create uncertainty in the market and could cause lasting damage to Australia's reputation as an education destination of choice, and a partner of choice with countries like India.

The success of Australia's universities in attracting international students has been a significant undertaking built over decades. We should not assume demand for Australian education will always be strong or our education offering will always be viewed favourably. We have already seen Canada drop from equal first to the fourth choice destination for study following its decision to cap international student numbers¹⁸.

For Australia to maintain its competitive advantage in this global industry we need to provide a welcoming and supportive environment, top-quality education and streamlined pathways to the labour market. In doing so, we will attract the best students and, with better alignment with migration policies, build a strong pipeline of highly skilled workers. Caps on enrolments run counter to this strategy and undermine the valuable objectives of integrity and diversity in the international education sector, as outlined in the Framework.

¹⁸ IDP Education. (2024). US takes pole position in the eyes of international students. https://careers.idp.com/news/us-takes-pole-position-international-students



¹⁷ Department of Home Affairs, <u>Student Visas Granted Pivot table</u>

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