The Hon Jason Clare MP
Department of Education
GPO Box 9880
Canberra   ACT   2601
Via email: StrategicFramework@education.gov.au

11 June 2024

Submission to the Department of Education: DRAFT International Education and Skills Strategic Framework

Dear Jason

Deakin University thanks the Commonwealth Government for the opportunity to comment on the **draft International Education and Skills Strategic Framework (Framework).** We wo uld like to re iterate ou r commitment to your vision of supporting a sustainable and quality focused world-class international education sector, but would emphasise this will require transparent, sustainable and equitable long term settings that acknowledges the multi-year trajectory for planning and delivery.

Deakin's successful internationalisation efforts stand as a testament to its vision and adaptability in the global education landscape. Through strategic initiatives and a commitment to fostering a diverse and inclusive environment, Deakin has emerged as a leader in attracting students, faculty, and partnerships from around the world – we believe we have done what is being asked of us, with an enduring emphasis on quality and underpinned by a clear understanding of our social contract with Australia.

Deakin has maintained good student survey results over the years, most notably we have been first in Victoria for overall QILT results (undergraduate) for 14 years in a row, and among the best performing national universities. This success is in part due to our comprehensive support framework for international students, concerning both the social, economic, and academic angles of their time with us. Critically, this also includes significant investments in building affordable, purpose-built student accommodation that houses both international and domestic students.

The above sits alongside our significant investments in teaching, learning and research infrastructure that has benefited all our students and the wider community. Our ability to invest in the region is underpinned by our success in international education and without this much of this would be at great risk.

Our success in international education has been based on our ability to be highly responsive to global demand – this is very much a demand driven sector and any policy changes must absolutely reflect this. Any introduction of hard international course caps runs the risk of severing this connectivity to the market and damaging Australia's success in attracting high-quality international students. Likewise, as the Government determines an enrolment cap model, we caution the use of highly onerous course or campus-based caps that could place unnecessary restrictions on reputable universities like Deakin, handicapping our ability to serve those very communities such measures are aimed at.

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However, Deakin's support for, and success in, international education, has at all times been shaped by our belief that it must have social license. International education may only succeed in Australia when supported by the broader community as a net benefit. We acknowledge the current pressures on government at all levels, particularly the Federal Government, to respond to a cost-of-living crisis, from wages to housing, and that inbound migration plays a role in this. As a major sector engaged in inbound migration, Deakin views higher education as having a meaningful role to play.

This makes it incumbent on all institutions engaged in international education to place the Australian and community requirements and needs at the forefront of international education – it is about benefiting out nation and building collaborative, mutually-engaged partnerships. It should not, and cannot, be seen through a purely income prism.

Deakin's international growth reflects this very position. As we have grown out international cohort over the last decade, diversification of international student enrolments by campus and course has been a priority. This reflects the opportunities, strengths, and needs, of those communities our campuses serve. From engineering to allied health, ICT, and more specialised areas of study, such diversification speaks to needs, skills shortages, and contributions to the Australian social and economic landscape.

A sensible policy approach

Appreciating the stated position and direction of Federal Government policy, Deakin have undertaken to develop the outline of a prospective policy reform. This has been designed to provide the certainty and managed capability for government, while giving stability and clarity to our sector, thus informing our planning moving forward. This proposal has been discussed with partners and colleagues across the sector including Curtin, Wollongong, and Newcastle universities. We found general support for the direction and principles of such a policy.

Our proposal utilises a broad enrolment cap model. This allows quality universities like Deakin to remain flexible to the needs of international students in a highly dynamic and competitive global international education environment, including the ability to determine our international student profile (by nationality, region, course, partners, campus). Our proposal is as follows:

- **Maximum 35 per cent onshore (headcount)** international enrolments as a percentage of institutional total onshore student load (excluding higher degree by research international enrolments and short-term mobility students**).**

- **No more than 50 per cent** international enrolments from a single source country.

- **No more than 40 per cent** of an institution's international onshore enrolments studying in a single broad field of education i.e. ICT, engineering etc.

The specific institutional reflection of the above would be outlined using the proposed compacts mechanism, per the recently released *Framework*. Likewise, we propose measures to both induce and regulate compliance. These include:

- The use of **rolling three-year averages** for all measurements of compliance.

- Where the **35 per cent cap is breached**, the Commonwealth Grant to that institution is reduced by an amount equal to the additional earnings. This ensures no monetary advantage may be gained. Further breaches may impose loadings on withheld funding.

- Consideration of **guidelines for exclusion from international education** recruitment in the case of consistent breaches of the above conditions, alongside an absolute commitment to quality systems and processes. Concurrently, we would suggest that there is tightened monitoring of quality, over and above that already announced.

- The **varying of post-study work rights** to encourage skills-needs and regional-needs growth in international education, addressing the regional disparity in current enrolments as well as the considerable skills needs exacerbated in regional areas. This is critical as this will   be a far

stronger lever to meet national skills demands than simply considering student numbers and field of education.

Noting the difficulty of significant system reform, particularly in a period of wider policy reform in higher education, Deakin also proposes:

- **A transition fund**, to support smaller and regional institutions shifting to the new international cap framework prior to the introduction of the proposed needs-based funding model. Transitional funding would recognise the important role played by various institutions to serve under-participating cohorts, and the difficulty of doing so at-scale without cross-subsidisation via international revenue. We note this fund would not be intended for larger, wealthier metropolitan institutions with significant capacity to shift economic models.

- The ongoing **linkage of the cap to growth in domestic scale**. Noting the Federal Government's ambition to grow domestic participation in university education, we propose sector-wide caps should be linked to domestic growth, with the level reviews every five years. This balances the needs for certainty and clarity, with levers of influence and control to government.

- **A focus on low-quality, largely private sector vocational providers**. Universities account for less than five per cent of CRICOS codes, with repeated reporting and investigation having highlighted the over representation of low-quality private vocational providers seeking to misuse the international education system. Removing such providers and their practices from the system would make a significant contribution to the managed growth and inbound migration limits sought, while also serving to improve the reputation of the broader post-18 education sector globally.

We believe the above would provide the setting for sustainability in the system, for institutions, as well as realise the management of migration load and settings consistent with Government policy directions. We have attached data to support this view, noting our analysis is limited by the lack of recent data available for consideration, having been advised by the Department of Education that 2023 data is unavailable until the fourth quarter this year.

Our submission below provides a realistic solution, balancing requirements and needs for sustainable regulatory settings.

We look forward to continuing engagement on the *Framework,* including our proposed approach that meets the drives and requirements of the Government, while providing certainty and transparency for the sector.

Deakin would appreciate the opportunity to discuss our submission directly, and my office will be in contact to arrange this meeting. Should you require any further details in the interim, please do not hesitate to contact us, which can be done via David Reeves, Senior Adviser to the Vice-Chancellor, on david.reeves@deakin.edu.au or 0421 566 098.

Yours sincerely

Professor Iain Martin
Vice-Chancellor

Addendum
1) Deakin's position on international caps
2) Deakin University's Internationalisation Success
3) Responses to Questions for Sector Consultation

1. Deakin's position on international caps

1.1 Encourage a move away from hard caps

Australian universities can retain their position of strength in the global context and serve the nation's best interests, but only if we get the settings right. As the Commonwealth government implements enrolment caps, we caution the use of hard international student course caps. Over-regulation can undermine the success of Australia's internationalisation of higher education.

Australia's success in international education has been based on its ability to be highly responsive to global demand. Any introduction of hard international caps runs the risk of severing this connectivity to the market and damaging Australia's success in attracting high-quality international students.

There is a very real risk that implemented in a rushed and ill-considered way, these changes will undermine much of our ability to invest in our region, underwrite regional education, and build research and innovation infrastructure. The impact of this is hard to overstate for Deakin, as our main discretionary investment approach would be removed.

To provide context, Deakin has modelled various scenarios and the financial impact of these. At the top end, the requirement to reduce international enrolments by 50 per cent would represent a loss of $85 million in year one, doubling to a total loss of in excess of $170 million over two years. When considered, $85 million represents approximately 470 FTE positions, the significant cross-subsidisation of research activity, and various other savings that would have to be found across the institution. Reductions below this level still have the potential to have major impacts, noting Deakin's engagement with international education is shaped to diversity, quality, and our social license.

1.2 A risk-based model

It is reasonable that the federal government would hold public universities accountable for the size and shape of their international cohorts and how they connect to the institution's mission. We would expect the government to hold institutions to account within reasonable parameters without imposing the task of managing restrictive hard caps in competitive markets.

However, we need to ensure that the delivery of caps do not undermine the strong footing Australian institutions have in international education. It should be nuanced and risk-based to manage the international cohorts to naturally favour universities as flagship providers of international education, which have extensive experience in the realm of higher education and robust processes to ensure quality and integrity.

We propose an **enrolment cap model** with the following criteria as a fair and reasonable approach for mature higher education providers:

- **Maximum 35 per cent onshore (headcount),** international enrolments as a percentage of institutional total onshore student load (excluding higher degree by research international enrolments and mobility students).

- **No more than 50 per cent** international enrolments from a single source country.

- **No more than 40 per cent** international enrolments in single, broad field of education (as per Australian Bureau of Statistics Classification).

Caps administered and monitored on a **rolling cycle spanning three years** provide both the government and universities with the opportunity to address student numbers within a reasonable timeframe in cases where caps are exceeded.

Our market research indicates that this type of model can be successfully applied in the sector without disadvantaging most providers.

Chart 1. Percentage of international student enrolments in comparison to total student cohort - All universities (2019)
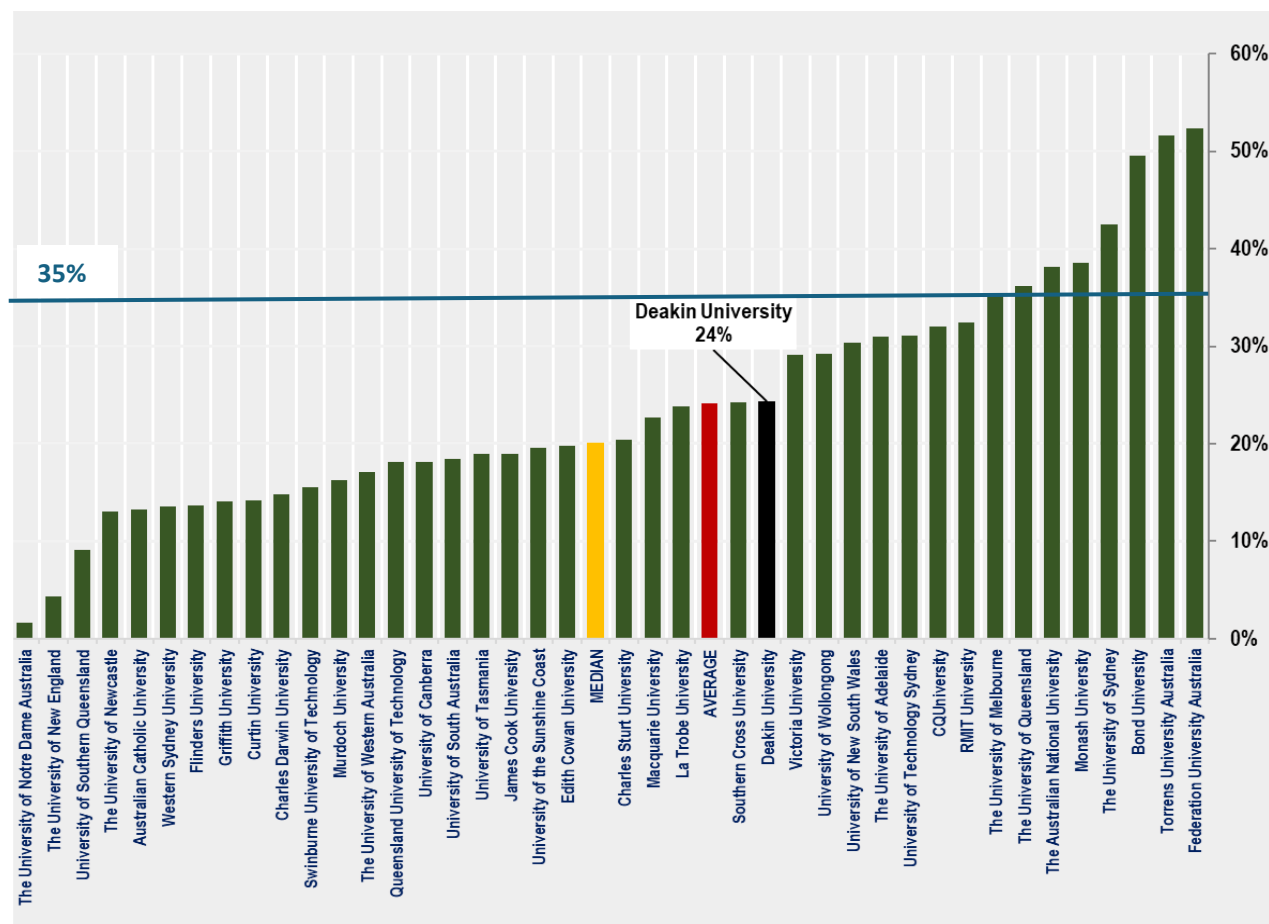
SOURCE: Department of Education, Higher Education Statistics

Calculation made including domestic and overseas students in undergraduate, postgraduate, non-award and enabling courses studying on-shore and off-shore and all modes of attendance (external, internal and multi-mode)

The specific institutional reflection of our proposal would be outlined using the proposed compacts mechanism noted in the *Framework*. Likewise, the following measures are proposed to both induce and regulate compliance. These include:

- The use of **rolling three-year averages** for all measurements of compliance.
- Where the **35 per cent cap is breached**, the Commonwealth Grant to that institution is reduced by an amount equal to the additional earnings. This ensures no monetary advantage may be gained. Further breaches may impose loadings on withheld funding.
- Consideration of **guidelines for exclusion from international education recruitment** in the case of consistent breaches of the above conditions, alongside an absolute commitment to quality systems and processes.
- The **varying of post-study work rights** to encourage skills-needs and regional-needs growth in international education, addressing the regional disparity in current enrolments as well as the considerable skills needs exacerbated in regional areas.
- The ongoing **linkage of the cap to growth in domestic scale**. Noting the Federal Government's ambition to grow domestic participation in university education, we propose   sector-

wide caps should be linked to domestic growth, with the level reviews every five years. This balances the needs for certainty and clarity, with levers of influence and control to government.

We believe the above would provide the setting for sustainability in the system, for institutions, as well as realise the management of migration load and achieve Government policy settings.

1.3 Transition arrangements of the new approach

We encourage a highly considered and consultative approach with an integrated formal review period that give providers the opportunity to negotiate changes as needed.

Transitional arrangements for consideration include:

- **A transition fund**, to support institutions shifting to the new cap framework prior to the introduction of the proposed needs-based funding model. Transitional funding would recognise the important role played by various institutions to serve under-participating cohorts, and the difficulty of doing so at-scale without cross-subsidisation.
- **A focus on low-quality, largely private sector vocational providers**. Universities account for less than five per cent of CRICOS codes, with repeated reporting and investigation having highlighted the over representation of low-quality private vocational providers seeking to misuse the international education system. Removing such providers and their practices from the system would make a significant contribution to the managed growth and inbound migration limits sought, while also serving to improve the reputation of the broader post-18 education sector globally.

We know that international student sentiment has been impacted by recent policy changes and announcements. IDP has recently released the **Emerging Futures, Voice of the International Student research report** which indicates there is a sharp increase in the popularity of the US as international students respond to policy changes in Canada, Australia and the UK. 41% of prospective students to all destinations are reconsidering their study abroad plans, unsure how policies will affect them or more inclined to apply to another destination.

The growth in the US and emerging markets demonstrates that students remain committed to bringing their global study dreams to life but are sensitive to policy changes. We therefore encourage the government to ensure clear policy direction to ensure Australian institutions maintain their competitive advantage in this global market.

The application of a phased approach will allow providers and students to adjust better to the new model, including consideration of current enrolments under existing arrangements.

2. Deakin University's Internationalisation Success

2.1 International Student Profile

Deakin has made investments into diverse source countries to directly manage the quality levers and ensuring the integrity of our international cohort. Over the years our diversification efforts see us less reliant on any one source country. Deakins overall proportion of international student enrolments as compared to total student cohort has also dropped since 2019, highlighting the university is not simply focusing on growth.

Deakin's relationship of over twenty five years with our Navitas college partner, Deakin College, has been a key element in delivering a diversified, high quality and sustainable international student cohort. The importance of this prime pathway should be recognised within the cap model.

Chart 2. Percentage of Deakin's international student enrolment in comparison to total student cohort (2019 - 2022)
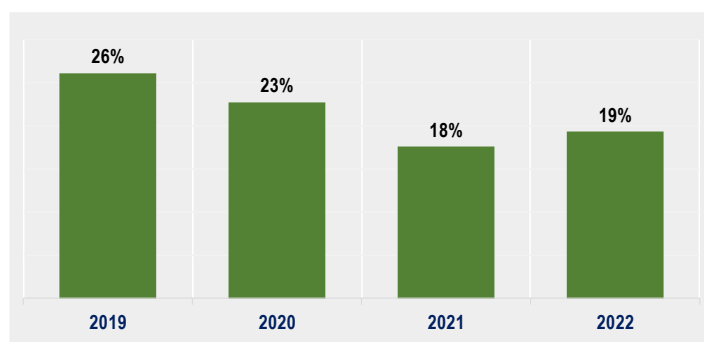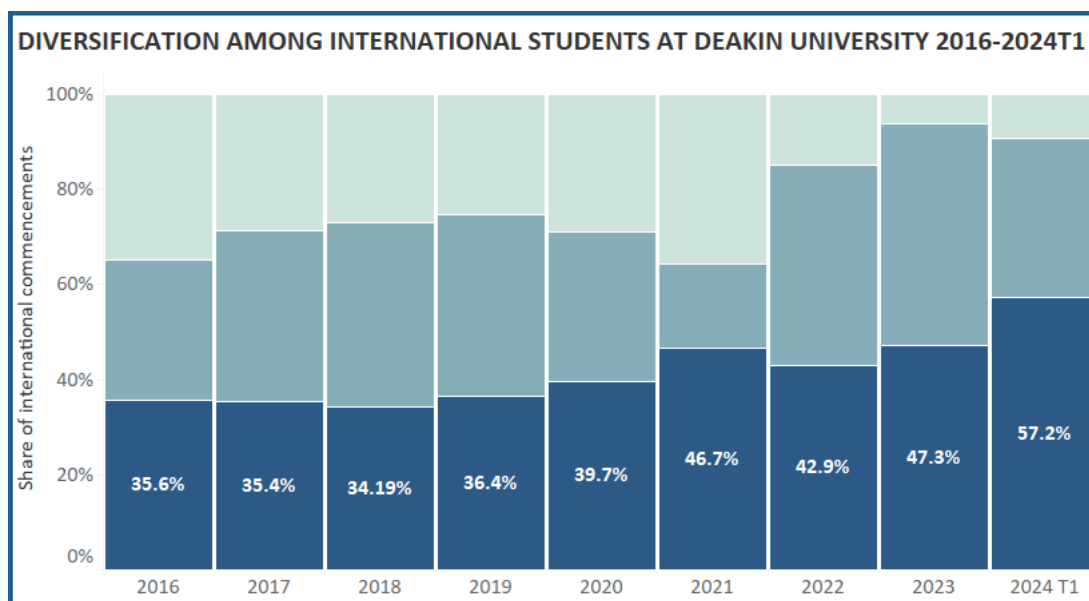

SOURCE: Department of Education, Higher Education Statistics

Calculation made including domestic and overseas students in undergraduate, postgraduate, non-award and enabling courses studying on-shore only and all modes of attendance (external, internal and multi-mode)

In 2023 we see: 6.5% students from China (up to 9.3% in 2024-T1), 46.4% from India (down to 33.5% in 2024-T1) and 47.3% of the cohort from over 10 other source countries (up to 57.2% in 2024-T1).

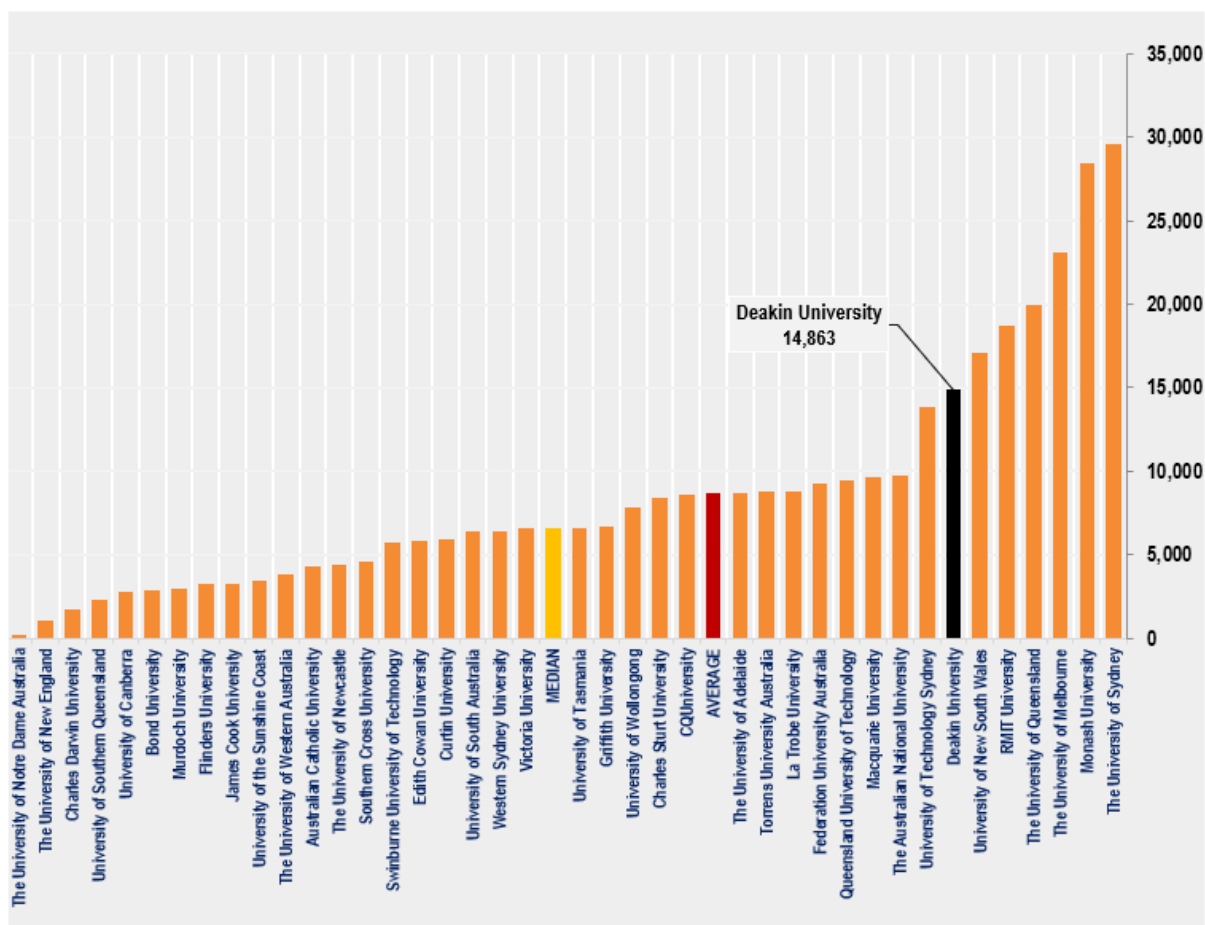**Chart 3.** Comparison of China, India and all other source countries

(Source: Deakin University, Market Insights)

Deakin is amongst the majority of institutions that have less than 20,000 international students.

Chart 4. Number of overseas student enrolments at all universities (2019)

Source: Department of Education, Higher Education Statistics

Includes overseas students in undergraduate, postgraduate, non-award and enabling courses studying on-shore only and all modes of attendance (external, internal and multi-mode)

2.2 Accommodation

Deakin Residential Services PTY Ltd (DRS) is a not-for-profit wholly owned subsidiary operating since 2014. DRS hosts students from various cultural backgrounds in their residences across the four campuses (Burwood, Warrnambool, Waterfront and Waurn Ponds), aiming for maximum of 60% international students at our Burwood campus with lesser proportions on other campuses. DRS has 2939 beds in total, with: Burwood at 1177, Warrnambool at 254, Waterfront at 455 and Waurn Ponds at 1062.

DRS aims to ensure that Burwood maintains a minimum of 40% domestic students to deliver on the student experience for all our residents. Waterfront has had a growth of 25% since 2019, the convenience of the Waterfront campus and proximity to the train into Melbourne as well as guaranteed accommodation has seen an uplift in demand from both domestic and international students.

We feel it is important that international students travelling to Australia for an experience can live in an environment that truly reflects an Australian educational institution. Living together allows students to interact, learn about, and appreciate each other's cultures naturally.

In addition, the value of our domestic students meeting and building long term relationships and networks is invaluable. Deakin values the growth in international student utilising the more affordable Deakin Residential Services, adding vibrancy and opportunity to our cohorts no matter where they study.

Deakin also notes considerable concern regarding not just supply of student accommodation, but its affordability. We share these concerns. Accommodation for   students

must be available, but at a price point that may be accessed. Particularly in the current cost in living environment, this is a focus of Deakin. Our whole owned model provides Deakin greater flexibility in this regard. Though not immune from cost pressures, our not-for-profit model removes the need to the accommodation to drive profits back to owners and shareholders, ensuring greater value for money to students. We strongly suggest the Federal Government consider cost to students, as well as availability, when policymaking concerning student accommodation.

We agree this is a particularly critical part of the current policy environment, requiring real attention. Our model, unique to the sector, enable Deakin to serve three critical factors:

1. Meet the needs of our students;
2. Meet the needs for active controls and assurances regarding student safety; and
3. Ensure cost effectiveness and accessibility to students.

Chart 5. Ratio of international to domestic students in each campus accommodation
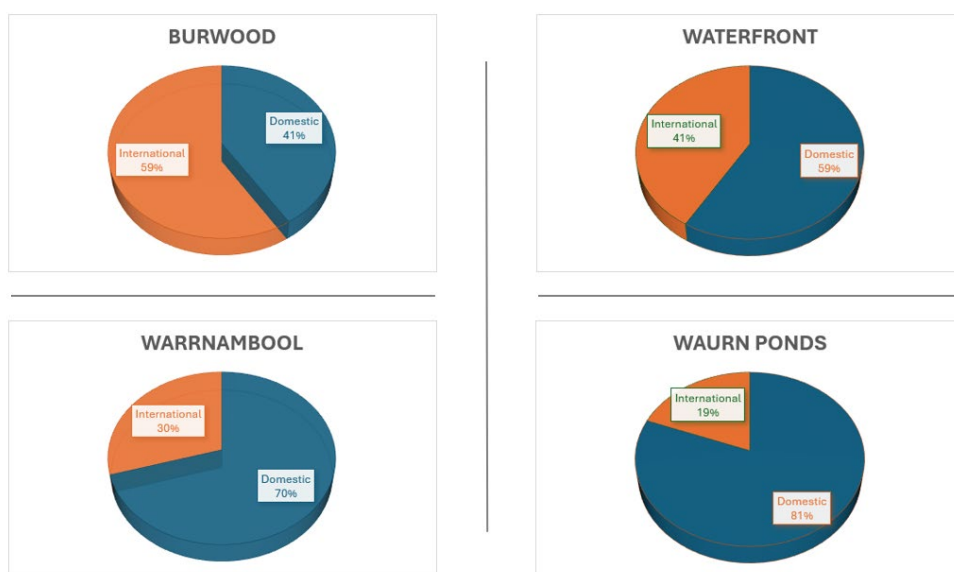
(Source: Deakin University, Deakin Residential Services)

DRS organise events and activities that celebrate different cultures. These include cultural nights, food festivals, language exchange programs, and workshops on traditions and customs. By employing these strategies, DRS can create a vibrant and inclusive living environment where cultural exchange thrives, enriching the experiences of all residents.

2.3 TNE and Partnerships

A key aspect of Deakin's internationalisation success is our emphasis on collaboration and engagement with international partners. By forging strong relationships with universities, industry partners, and government agencies globally, Deakin has facilitated knowledge exchange, research collaboration, pathways for international students and student mobility opportunities that enrich the educational experience for all involved.

Deakin is investing in and enhancing our Southeast Asia presence through partnerships and TNE arrangements. The establishment of Deakin's international branch campuses in GIFT City, India and Bandung, Indonesia is a testament to our commitment to global learning experiences. Deakin has a long and rich relationship with the South Asia region that spans three decades. Deakin was the first foreign university to establish operations in India in 1994. We have also monitored emerging markets such as Pakistan, the Philippines, and Kenya while managing application quality.

There are barriers to growth in offshore and transnational delivery of Australian   education and training, which are outlined under the response to *Question 10 in Section 3*

Clarification questions to government. Notably whilst there are opportunities in TNE to consider, TNE ventures are not a direct substitute for high margin onshore programs as they operate on a fundamentally different financial model and cater for a different market segment that is more price sensitive.

2.4 Student Satisfaction

We consistently receive strong student feedback from international students. In the 2022 QUILT survey, we achieved a score of 78.9 on the quality of the entire educational experience, which was one of the highest among peer universities.

The international student barometer administered by i-graduate, provides an overview of how satisfied international students are with all stages of their chosen University, from pre-arrival through to their learning, support and living experiences. For the most recent international student barometer 2023, Deakin achieved an *overall satisfaction score of 89.5% which was above the Global, ATN and Australia ISB benchmark institutions* and on-par with the Victorian benchmark institutions. Deakin's 2023 results are summarised below, the overall satisfaction rate for:

- Arrival experience was 94% - above the Global, Victorian, ATN and Australia ISB benchmark institutions.
- Learning experience was 90.4% - above the Global, Victorian, ATN and Australia ISB benchmark institutions.
- Living experience was 89.1% - above the Global, Victorian, ATN and Australia ISB benchmark institutions.
- Support experience was 91.2% - above the Global, Victorian, ATN and Australia ISB benchmark institutions.

2.5 Our Network

Deakin's in-country staff network plays a crucial role in helping to create TNE, partnerships, mobility and pathways opportunities. Our in-country network possesses intimate knowledge of the local education landscape, culture, and regulations. This expertise allows them to identify potential opportunities that align with the needs and preferences of both Deakin and the partner institutions.

Markets are managed by our Australian-based Deakin International division with the support of in-country staff, with over 100 staff employed in over 17 countries. They support our international student diversification strategy by undertaking country specific genuine student checks and engagement with foreign governments and institutional partnerships. They also manage recruitment, research, mobility, alumni, employability, and engagement activities.

2.6 Commitment Quality

Deakin University demonstrates its commitment to quality throughout the international student cycle, from recruitment and admissions to student support services, educational experience, and career development. Deakin maintains high standards in recruiting international students by ensuring transparency, integrity, and fairness in the admissions process. This includes providing clear information about entry requirements, application procedures, and program offerings, as well as conducting thorough assessments to select students who demonstrate the potential to succeed academically.

The Genuine Student criteria is an important aspect of Australian student visa regulations. As such, Deakin University has embedded additional steps to ensure Genuine Student requirements are met by prospective students. There are also defined guidelines for agents and in-country staff when enacting responsibilities, allowing greater transparency between stakeholders.

Deakin has implemented a comprehensive and very rigorous Genuine Student review process for students from high-risk countries. This includes country specific genuine student requirements that students must satisfy via a genuine student questionnaire and follow up interview. We also verify documents with issuing source (e.g. verification of bank statements with the bank).

2. Clarification questions to government:

Theme	Questions
Enrolment Cap	• What partner providers are included in the enrolment cap figures? for example would they include Deakin College? • Will Student Mobility commencements be excluded from the caps? • Study Abroad and Exchange students only enrol for 6 to 12 months and if they are included in the caps there would be no financial incentive to allocate places to mobility students. • Proportion of accommodation to enrolment expected? Will there be consideration given to purpose-built student accommodation providers? • Is it enrolments or commencements? • Proportion of disciplines that should be aligned to national skills needs? • Diversity or recommended regions determined by university or Government? • Will this be a ratio comparison between Domestic and International? • There needs to be a transitional process for the introduction of caps as universities are already offering places for T1 and issuing COEs. Should universities pause making anymore offers until the caps are unknown to ensure that we do not go over the allocated cap? • The impact of Caps on TNE (articulation), 1 year Honours, 1 year Grad Dip and mobility. If students are here for shorter durations should universities focus on 3 year Bachelor degrees instead of shorter duration courses. • Will students who need an extension be included in the Caps because they are issued a new COE and therefore considered as a new student.
Data and reporting	• What will be the reporting and data requirements? • What Commonwealth support will be provided to facilitate additional resourcing requirements for reporting?
Regional	• The critical role that international students play in regional cities. How will the government support universities in growing enrolments at regional universities? • Will there be financial support in building accommodation in regional areas? • Local government may not approve planning requirements for additional accommodation. • Will there be consideration given to challenges with engaging academics to support teaching or research opportunities in regional locations?

3. Responses to Questions for Sector Consultation
Objective 1: A Sector Built on Quality and Integrity

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

Deakin has made investment into our diverse source countries to directly manage the quality levers and ensuring the integrity of our international cohort. We refer to **Section 2 of this document** which outlines our efforts with quality and integrity.

We support the following government focus initiatives noted in the framework*:*

- *(p9) to prevent poaching government will consider increasing the non-transfer rule to 12 months.*

We strongly welcome this improvement to the integrity of the international student visa program. The current six-month transfer rule allows international students to be vulnerable to unethical agents and providers (often under a common ownership).

- *(p9) Crackdown on provider-agent joint ownership*

Deakin welcomes this. We would go even further and recommend the exclusion of family members from owning the agency, but we appreciate that this may be difficult to enforce.

- *(p10) New providers seeking CRICOS reg must deliver to domestic students for 24 Months first.*

Deakin welcomes this.

- *(p10) Where a provider has not delivered a CRICOS registered course to international students for 12 months their registration will be removed.*

Deakin welcomes this.

- *(p10) Further initiatives to improve integrity of the international student program are raised. The government will enact a stronger fit and proper person test, to prevent collusion between education agents and providers. A ban on commissions for onshore student transfers.…the government will also introduce the ability for the Minister for Education to stop accepting or processing applications for registration of new providers and new courses.*

Deakin welcomes these initiatives.

- *(p13) …a strong whole of system data sharing and evidence based risk indicators.*

Deakin has long advocated for this (including through appearance at the Joint Standing Committee on Foreign Affairs, Defence and Trade inquiry into tourism and international education). Timely government data and information sharing will allow providers like Deakin to respond to issues as they emerge.

Deakin seeks further clarification and consultation on *(p13) "government will increase transparency on agent fees".*

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

Deakin has made significant investments on-and-offshore in mechanisms that ensure the integrity of its international cohort and international student experience, in and beyond the classroom. Please refer to **Section 2.6 to quality measures.**

Objective 2: A Managed System to Deliver Sustainable Growth Over Time

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

Deakins recommended enrolment cap model is set out in **Section 1 of this document.**

Whilst Deakin supports the government efforts to ensure quality and integrity of the international education system, we would like there to be risk-based consideration given to providers like Deakin that have a standing history in the sector with robust quality practices.

Australia's success in international education has been based on its ability to be highly responsive to global demand. Any introduction of hard international course caps runs the risk of severing this connectivity to the market and damaging Australia's success in attracting high-quality international students.

- *(p12) government will work with providers to consider optimal international student cohorts at provider, location and course level.*
- *(p15) …allow government to set quotas at provider level within specific courses and locations.*

As Deakin has grown its international cohort over the last decade, it has successfully diversified international student enrolments by campus and course. We would like to maintain the flexibility to determine our international student profile (by nationality, region, course, partners, campus).

As mentioned above, this carries **very high risk of disconnecting quality providers with international demand in highly competitive markets.**

We note most of Deakin international students return home, a focus on skills and training relevant to *both* Australia and their home country is vital to providing a relevant educational opportunity.

- *(p16) …government will consult with HE and VET sectors on approaches to implementing a managed system to deliver sustainable growth over time that maximises opportunities and mitigates risks. As the sector transitions into these setting, international student profiles will be included as an element of mission-based compacts.*

A compacts-based approach is preferred as it will allow Deakin to point to our well-managed, diverse international student cohort, including increased provision of student accommodation (and social integration programs) across our four campuses.

- *(p16) Government will consider excluding short-course, non-award and stand-alone ELICOS students.*

Deakin welcomes this.

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

We would encourage the government to apply a risk-based approach to manage the international cohorts to naturally favour universities as flagship providers of international education, as noted in **Section 1 of this document.**

We would like the government to review existing incentives (i.e. PSWR, Destination Australia, additional PR points if you study regionally etc..) to encourage regional enrolments.

> e.g. Geelong be considered for "Destination Australia", provide support to increase courseware/research delivery and development for the regions, support planning requests to build more accommodation,

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

As noted in **Section 1 of this document:**

- Over regulation by government could risk Australian university positions of leadership in global markets.

- The enrolment caps will add significant additional reporting requirements on providers, complexity of the reporting will depend on the model applied.

- There will be challenges associated with the allocation of enrolments targets across the faculties, programs, markets, and partnership arrangement of the universities.

We will rely on the Department of Home Affairs to invest resources to support the quick visa processing necessary to enable providers to manage allocated enrolment thresholds.

6. **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?**

No comment

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

As noted above most of Deakin international students return home. A focus on skills and training relevant to *both* Australia and their home country is vital to providing a relevant educational opportunity. Therefore, whilst we would encourage the incentivisation of courses that bridge Australia skill gaps, we would be advising not to do so at the detriment of courses that are sort after by international students that need to be ready for work in their home country. The considered use of visa conditions would be a far stronger signal where we need to meet skills needs.

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

The model will need to recognise the critical role of private purpose-built student accommodation providers. There continues to be vacancies in some private purpose-built student accommodation in Melbourne CBD, but the price point is more than $500 per week for a room and this is unaffordable for the majority of Deakin students.

We would recommend that investment in additional housing needs to hinge off a market value / assumption of affordability and inclusions offered by providers (much like the GST Toolkit calculations undertaken currently by Residential Colleges and on campus accommodation exempt from the RTA and operating as not for profit as per DRS). This would ensure new stock is addressing the needs of students and are not just investing in accommodation that remains empty.

Deakin does an annual review of market values, university on campus accommodation in Victoria and the not-for-profit threshold prior to setting rates for the following year so we ensure that we remain the best value for our students.

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

Please refer to **Section 1.3 of this document:**

<u>Objective 3: Taking Australian Education and Training to the World</u>

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

- Systemic differences: TNE ventures operate on a fundamentally different financial model and cater for a different market segment that is more price sensitive, therefore TNE ventures are not a direct substitute for high margin onshore programs. In addition many key markets do not allow for the repatriation of "profits" to support Australian activities (India and Indonesia for example).

- Partnership Challenges: These include finding the right partners with the right interests, supplying staff with the right capability and passion, discipline strengths, students with interest and means to travel, and being in the right location.

- Regulatory and Compliance Issues: Different countries have education regulations and accreditation requirements. Navigating these can be complex and time-consuming.

- Quality Assurance: Ensuring that the quality of education delivered offshore matches the standards of onshore programs can be challenging. This includes consistent teaching quality, assessment standards, and student support services.

- Cultural and Language Differences: Understanding and adapting to cultural differences and language barriers can impact the effectiveness of education delivery. This includes differences in learning styles and expectations.

- Market Competition: Australian institutions face competition from local universities and other international providers who may have established reputations and networks in target market.

- Political and Economic Factors: Political instability or economic downturns in the host country can affect student enrolment and the overall viability of offshore programs.

- Logistics and Infrastructure: Establishing and maintaining physical campuses or reliable online platforms in foreign countries can be logistically challenging and costly.

- Legal and Financial Risks: Legal challenges, including intellectual property issues and financial risks such as currency fluctuations and funding limitations, can hinder growth.

- Reputation and Brand Recognition: Building and maintaining a strong brand reputation in a new market takes time and resources. Missteps can harm Deakin's global reputation.

- Resource requirements: Local and in-country staff are essential to maintain oversight and relationships.

- Education: The government can educate Australians about the importance of international higher education to our economy, including sociocultural factors that may benefit the exchange of staff and students. Measuring the success of offshore TNE activities is also a challenge, data seems to lag, and many of the offshore student numbers do not count toward any form of ranking system.

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

- *(page 32) Australian qualifications are increasingly recognised all over the world. Qualifications recognition is a fundamental enabler of student, graduate, academic and worker mobility. It underpins partnerships, linkages and collaborations both regionally and globally. Certain   modes of*

TNE delivery are also affected by a lack of recognition, requiring greater cross-border dialogue and cooperation.

Deakin would welcome support from government to negotiate and promotion of best principles and practices for qualification recognition.

Other support that can could be provided:

- Government's financial support to establish and support TNE arrangements.

- Continued support by DFAT and AUSTRADE to establish TNE arrangements, including brokering relationships in the country and influencing international higher education policy and regulation that allow for Australian institutions to explore and establish TNE arrangements.

- Bringing stakeholders together for capacity building.

- Provide support and guidance to institutions seeking accreditation in foreign countries.

- Develop and promote quality assurance frameworks that ensure Australian education standards are maintained offshore.

- Support the development of international alumni networks to build brand loyalty and promote Australian education globally.

- Streamline visa processes for international students and staff involved in transnational education programs.