

ISANA

Objective 1

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

-ISANA members propose government actively use the tools provided by the ESOS Act and the standards of the National Code as further reforms should not be required to these two regulatory instruments. Regular monitoring of providers between registration periods for compliance of the National Code standards would strengthen, monitor and regulate the integrity and quality of the sector.

-ISANA strongly advocates for training, professional development and good practice to be actively supported and encouraged by all levels of government. As a key provider of professional development across most areas of ESOS compliance, and best practice in delivering student support and programs in Australia, we know increases in funding for staff of providers in these areas leads to greater understanding, engagement and improvements within the sector.

-The registration and monitoring of 'dodgy' providers should be further strengthened by the regulator to ensure they are either assisted or discontinued.

-ISANA has continually opposed the focus of government being on student numbers. We believe there should be stronger focus on ensuring integrity in the quality of education on offer and the students being accepted into courses and institutions deemed to be 'dodgy'. These two go hand in hand. The continued focus on the economic value and student numbers has allowed the integrity of the sector to be devalued. This sits across a limited number of institutions, not the majority of the sector or enrolled international students.

-There is currently a disconnect between the government expectation of adequate funding of a strong and world class University sector and elements of the new framework. The framework appears to be seeking to substantially reduce the number of students able to undertake courses at universities which offer off quality and compliant courses. This will result in the loss of vital revenue for universities, and as demonstrated by the impact of COVID19, will reduce the capacity for institutions to fund sufficient student support services and remain compliant with many aspects of the National Code. Student experience and quality of education will be at risk.

-There needs to be a dedicated Federal Minister for International Education and government mixed messages to students need to stop.

-As noted in ISANA's submissions to the parliamentary inquiry into International Education in 2022, ISANA would support Government using ESOS and the National Code tools to require all Education Agents to undertake appropriate training of the National Code standards. Government should use the ability to access data in PRISMS that identifies poorly performing Agents who recruit into multiple providers to assist providers take appropriate remedial or disciplinary actions.

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

-Ensure training and professional development is undertaken by all staff who support students, including academic and professional staff, related to the National Code requirements, alongside encouraging and sharing best practice.

- Recognise that the National Code is the minimum standard that must be implemented and strive for continual improvement beyond each standard.

-Understand and engage with Generative AI to improve course outcomes, student learnings, delivery and academic integrity.

-Providers as a whole and via Peak Bodies, need to continue to raise community awareness of the value of international education beyond the economic benefit and dispel misconceptions to highlight the real impact on communities which has been shown to be an overwhelmingly positive one.

-Work closely with all levels of government, community groups, support services and employers to enable students apply their acquired qualifications within Australia should they decide to remain post their studies.

Objective 2

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

-The capability of the current CRICOS and the ESOS Framework should form the basis on which to build a robust and transparent system.

-The approach should focus on the level, quality, type and delivery of on-campus or joint partnership services and support, as this is a strong indicator of the expected quality of the student experience.

-There is an ongoing need to understand the inter-dependencies between different sectors in the industry to know how caps in one area may have unexpected consequences within the sector. This includes the impact on ELICOS and pathway programs that support up to 3 sectors.

-Any approach should be underpinned by putting the student first, with the knowledge that these are young people who should be able and equipped to make informed educational choices when deciding where to undertake their education.

-Each Ministry of Government needs to communicate when pulling levers or changing legislation to understand the potential impacts as many times it appears they are at odds with the overall vision for international education.

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

- Provider capacity to support enrolled students to succeed is fundamental to the overall level of enrolled students at any institution. Currently investment in student support is significantly lower than that allocated to marketing and recruitment, and as experienced during COVID, is the first area to be reduced when funding is at risk. It is widely acknowledged that students who are well supported through ongoing and well-designed programs to support their mental health and well-being, careers and employment outcomes will perform better, however these services can be seriously under-funded.

- The government should consider the level of Provider funding for student support programs as a percentage of International Student revenue, to a) inform the level of students, b) ensure it is a requirement and c) ensure this is transparent in institutions. Underpinning this, as noted above is the ongoing training of student support staff which can be seriously under-funded. Currently, regulation simply requires that staff only 'be aware of the National Code' not have a specified level of understanding or training in the National Code.

- Education agents who are members of ISANA advise that many students choose Australia because they can work whilst studying. This needs to be acknowledged and considered in any determination as the benefits are valuable to both students and Australia.

- Education outcomes for students should be monitored more closely to ensure that the quality of education is consistent. This could be done through the current ESOS Act provisions if they were more closely monitored and applied.

- It should be considered whether increased student numbers is more beneficial than a cap on students as long as wrap-around support services can be provided. Short-term sector changes should be examined closely as to any unintended impacts.

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

Will these suggested changes really attract the right students and will it have the desired outcome/s.

The key risk for students where numbers are capped and courses curtailed, is through sending mixed messages about the 'Genuine Student'. Currently students are required to demonstrate why they want to study a course, however if students are actively encouraged to study in a field they had not previously considered or a course that may not be transferrable in their home country they may become disillusioned and withdraw mid-course. The impact on the student must always be considered, as well as the impact on the support staff attempting to assist students throughout their studies.

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?

ISANA would question if growth is the objective of the new Framework?

Pathways programs such as secondary schools, ELICOS, Foundation and pathways programs should be exempted from caps. These programs should be encouraged as they currently provide strong

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

Because Australia's skill requirements change constantly, a government list of acceptable courses could lead to students studying for the wrong reasons or withdrawing part way through their studies, and more often leave them with a course that no longer provides the employment or migration outcomes they were initially seeking. ISANA suggested implementing incentives such as providing adequate support to obtain paid employment on graduation or during their studies as part of their courses, aligning post study work rights pathways and further study incentives for areas of priority or skills shortage to be a more sustainable approach.

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

Purpose-built student accommodation is a very small piece of the student accommodation puzzle. Student accommodation needs vary greatly and purpose-built accommodation is often the most expensive option, unaffordable for most students. We propose that Government shift the focus to support providers to demonstrate that they are proactive in finding appropriate and affordable accommodation for their students through partnerships within the sector, identifying suitable and affordable housing partnerships with eg. real estate agents, home-stay providers and private housing suppliers.

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

The timing of any new arrangements and a staggered approach should be underpinned by a clear and agreed understanding of the requirements, supported by evidence and insights into how each sector of international education may be differently impacted. For example, regional campuses versus CBD campuses, institutions with large on-campus accommodation, and student cohort requirements.

Objective 3

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

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

Hold consultative sessions to discuss 'lessons learned' from those who have been the trail-blazers in this space, including those that did not succeed.

Set out clear expectations in regard to providers setting up TNE.