

# Melbourne Polytechnic

## Objective 1

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

The Government's own data shows that in spite of the unsustainable growth in international student visas for VET, public TAFEs across Australia only accounted for a fraction (<10,000) student visa grants in 2023, compared to hundreds of thousands in private VET. TAFE is not to blame in any shape or form for the housing crisis or the integrity of the visa system, which prioritised cheap, generic VET courses over those designed to support Australia's actual skills needs. The proposed current reforms will further damage the ability of TAFE to admit international students to support Australia's skills needs in a sustainable manner.

TAFE is the cornerstone of Australia's vocational education system yet is not empowered to play a role to improve the quality of the sector when it comes to recruitment of quality international students.

The draft Strategic Framework mentions Universities 69 times, but TAFE not even once.

In order to improve the quality and integrity of the sector, TAFE should be acknowledged in Australia's International Education and Skills Strategic Framework, and treated as the cornerstone of furthering Government policy in the delivery of quality VET programs to international students.

As TAFEs are owned by the State Governments, CRICOS limits for TAFE should be negotiated between State and Federal counterparts to ensure that international students are recruited in programs that meet the local and national skills needs.

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

## Objective 2

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

As TAFEs are owned by the State Governments, CRICOS limits for TAFE should be negotiated between State and Federal counterparts to ensure that international students are recruited in programs that meet the local and national skills needs.

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

To implement a system that cannot be gamed by unscrupulous providers, agents and even non-genuine students.

If the system is controlled with effective CRICOS caps and treatment of quality Universities and TAFEs as the cornerstone of our international student industry, the Government will be better able to set and meet targets.

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

The system needs to ensure that international students are genuine about the course and provider of study at all levels, rather than being designed to encourage students to say one thing (to get the visa with a "gateway" provider) and then to switch upon arrival in Australia.

What this means is that students should only be able to switch provider with a release letter from their Principle Provider, with the risk being that when students apply for their subsequent visa, if they have not followed their initial study plan, they may not be granted a future visa in Australia.

#### **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?**

They should be included with a risk-based approach that takes into account provider and country risk ratings.

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

To some extent Universities and public TAFE providers should be permitted to offer courses which are based on market demand. Additional incentives should be offered to study courses aligned to Australia's skills needs, such as post study work visas and preferential grant rates providing the student is committed to their Principle Provider.

State Governments should request their own CRICOS capacities for courses run at their TAFE campuses which align with skills needs for both their State requirements, as well as Federal requirements. This is the best way, fundamentally, to restrict numbers of incoming international students, while ensuring they are studying the right courses for Australia's interests, and that they are administered in a sustainable and quality manner.

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

Firstly, to acknowledge that international students actually stimulate the construction of accommodation near to education providers such as TAFEs and Universities. Also to acknowledge that TAFE have never been supported to recruit enough international students that would in any way impact our housing affordability.

State and Federal Governments should work together to encourage the leverage of State assets in TAFE to expedite the approval of international student accommodation to be constructed on TAFE campuses. This will stimulate the economy, investment, while ensuring that increased numbers of international students at TAFE are being supported by the increased accommodation available.

The housing shortage can also be alleviated by removing some planning restrictions around public transport hubs, noting that most international students are comfortable in apartments rather than houses.

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

The international education industry has high-value international students from Universities, TAFEs and non-University Higher Education providers, which should be supported during the transition at the expense of large numbers of VET students studying generic courses which are not in the national interest.

It would indicate major mismanagement of this highly valuable industry if the quality providers of international education were caught unnecessarily in the crossfire as part of an attempt to tackle a broader issue.

### **Objective 3**

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

Australian TAFE providers have an unparalleled reputation around the world for being the cornerstone of our vocational education system and replicating this is in high demand across our region.

The treatment of Australian TAFE providers by the Department of Home Affairs as being "just another provider of VET" is unnecessary and damages our reputation.

The Australian Government needs to be clear that they also see a special place for TAFE in provision of both transnational education and education for international students onshore.

Given that Australian TAFEs have never driven the issues around unsustainable international student recruitment, the reluctance of Department of Home Affairs to grant student visas to study in TAFE damages our reputation and also impacts our ability to deliver transnational education in regions such as India, Indonesia, Thailand, Vietnam, Philippines.

The requirement for offshore trainers in VET to have Certificate IV in Training and Assessment (TAE) is an unnecessary barrier to competing with our peers from around the world. Offshore delivery of VET by TAFE should have the TAE requirement removed

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

The requirement for offshore trainers in VET to have Certificate IV in Training and Assessment (TAE) is an unnecessary barrier to competing with our peers from around the world. Offshore delivery of VET by TAFE should have the TAE requirement removed.

Given that Australian TAFEs have never driven the issues around unsustainable international student recruitment, the reluctance of Department of Home Affairs to grant student visas to study in TAFE damages our reputation and also impacts our ability to deliver transnational education in regions such as India, Indonesia, Thailand, Vietnam, Philippines.

Addressing the student visa issue for TAFEs allows them to build larger offshore presences to capitalise on transnational education opportunities as well.