

StudyPerth

Objective 1

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

We are supportive of the Australian Government's focus on integrity and quality and stress the importance of international students to Australia's public and economic ecosystem as well as the positive impact on the domestic student experience. We recommend stronger focus on the need for diversity of markets and cohorts and an acknowledgement of the increased investment and time required to achieve this.

The current visa framework does not incentivise diversity and a hard cap on student numbers will have an adverse effect on institution's appetite to strategically diversify source markets and student cohorts.

Comments on future actions proposed in the framework:

1. We do not support lengthening the 'no transfer period' to 12 months, as it is not in the best interest of the student. If a student is not coping with a course, they will generally know within the first 6 months – forcing them to continue to study the course for 12 months is not fair to them. Instead, we support maintaining the 'no transfer period' at 6 months but putting in controls to ensure that students change to a course of equivalent level or higher; they are not allowed to transfer to a lower-level course.

2. Currently in Western Australia TAFE offers vocational training to domestic students for free. Expecting a new provider to deliver courses to domestic students for 2 years before seeking CRICOS registration means that no new VET colleges will open in WA. Recently we have seen the opening of a cybersecurity college which is well resourced and offers very targeted courses to international students in an area of skill shortages worldwide. This market flexibility will not be possible if this reform is actioned.

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

Providers understand the goal of government in terms of improving the integrity of the sector, however the blunt instruments that are currently being wielded (from visa delays to downgrading risk ratings to prioritising only level 1 institutions) is having a detrimental effect on all providers – and especially those in smaller jurisdictions like Western Australia. Having clear guidelines and fairness in visa processing will ensure that our providers can deliver the high-quality education and training experiences promised.

Objective 2

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

We recommend considering additional focus on the positive correlation between the inflow of international students and foreign direct investment (FDI). The impact is beyond education as a sector and an immediate shortfall will have an indirect but immediate impact on the Australian economy.

We strongly recommend the Government consider a transitional period of at least 12 months, with effect January 2026, to allow for the management of student recruitment pipelines of 12-18 months, which is especially critical in markets where strong government sponsorships and packaged offerings drive the demand and therefore diversity can be better achieved.

From January 2026, given that Western Australia currently has student numbers that are well below NSW and Victoria, but with the capacity to accept more students in our quality institutions – we believe the

highest-level caps should be at a State/Territory level. Western Australia should have a cap that replicates COAG funding allocations based on population. This means we would like to see at least 10% of all international students in Australia coming to Western Australia.

To allocate caps:

We propose a three stage quotas system, based firstly (1) on State/Territory quota, then allocate quotas by (2) type (higher education and vocational training) within the jurisdiction, and then (3) to individual institutions.

Allocation to institutions should be a combination of reputation (see below comments on current risk ratings as a flawed measure), active participation in the local industry (eg. In WA, membership of peak body StudyPerth) and CRICOS capacity.

We have concerns with the current risk ratings, noting that these have been determined at a time when ratings are impacted by DHA decisions on visa delays and refusals that are not the 'fault' of the provider. A new review of risk ratings should be undertaken.

We also believe it is necessary to spread the international student cohort across Australia, and not just focus on the 'large' markets of Sydney and Melbourne – hence the suggestion of jurisdiction quotas.

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

International education is Australia's largest services export and forms a significant part of each State and Territories' economy. International students also add value to the community by adding diversity to our campuses and participation in the workforce while they are studying. The long tail benefits include visiting friends and relatives (for tourism), an emotional attachment to the city which has attracted investment (in WA we are seeing investment in hotels and purpose-built student accommodation from previous international students and their families) and interpersonal relationships and soft diplomacy across the region.

When considering the overall number of international students, the Australian government should ensure there is diversity in countries and regions students come from and a spread of students studying across all Australian States and Territories. It should also look at where students are best supported and where there are opportunities for students to gain work experience. (Note that over the last two years the refusal rate of visas for students coming to WA has been higher than the national average, with no indication from DHA as to why that is the case. This is in spite of the WA Government and local industry – including StudyPerth – actively supporting all students in their educational and work experience endeavours in WA).

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

Having a known set of parameters and rules mean that education and training providers can develop and deliver their businesses effectively and efficiently. The uncertainty of the last 6-9 months due to visa delays, regular announcement of changes to visa and international education settings etc. has made day-to-day business difficult for many providers.

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?

No – please leave schools, ELICOS and non-award providers out of the quota system.

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

The objective of our international education industry is to provide quality education and training to all, in courses that may be relevant for Australia but must be relevant for a student's home country.

Post study work rights are to give recent graduates time to gain some career experience in Australia, having received an Australian qualification that is known to the local business community. Given that some 85% of all students leave Australia, focusing on Australia's skills shortages does not support the sector or our region.

Our skills needs may not be the same as our neighbours' needs and to focus just on our needs ignores the benefits of soft diplomacy inherent in the international education sector.

Thus is not appropriate for the government to determine what courses should be available to international students based on Australia's needs alone.

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

Government incentives to attract investment into purpose-built student accommodation (PBSA) is a better response than forcing universities to build their own accommodation. PBSA supports all parts of the sector, noting that ELICOS and pathway colleges are important to higher education – so should not be ignored.

Incentives could include: discounted parcels of government land, infrastructure subsidies, occupancy guarantees that could be aligned to institutions, discounted rates and taxes, plot ratio bonuses etc. Incentives could be a combination of Federal, State and Local Government offerings.

Currently the PBSA industry is actively looking at Perth as an investment destination, noting the Commonwealth, State and Private investment in the Edith Cowan University and Curtin University campuses in the CBD (part of the Australian Government's Perth City Deal program) – and the active support for the sector and students through StudyPerth.

<https://www.infrastructure.gov.au/sites/default/files/migrated/cities/city-deals/perth/files/perth-city-deal.pdf>

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

Transparency and consistency. The current visa delays are obfuscating the situation and making it impossible for providers to redesign their business processes in a timely manner to meet the changing framework (regulations and legislation). Providers understand what the Government is trying to do with regards improvements in quality, but the implementation has been chaotic and unfair – and is damaging all providers (both good and bad, small and large) without justification.

Objective 3

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

We are pleased with the Government's acknowledgement of TNE offerings and the soft diplomacy this achieves. However, we caution against the assumption that an increase in TNE numbers could offset onshore international numbers for a number of reasons:

- TNE is not a major revenue generator. The value propositions of TNE are about making a difference, in terms of cultivating talents, conducting global scale research, industrial engagement, as well as creating soft power and people-to-people exchange for Australia.

- A reduction in onshore international student places does not necessarily equate to higher enrolments in TNE. Students who have planned to study higher education abroad in Australia will likely select another country to enrol if not provided with a place here.

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

No response