



**Submission to the Australian Government
Draft International Education and Skills Strategic Framework**

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Sydney University Postgraduate Representative Association (SUPRA) is the representative organization for postgraduate students at the University of Sydney. Established in 1970. SUPRA's constituency has grown to a point where in 2023, 28,431 students were enrolled in postgraduate degrees of which 56% were international students. The 2023 total enrolment of international students at the University of Sydney was 31,429 or 45% of the total student enrolment at our oldest university. SUPRA has for over 50 years provided professional casework and legal services to international postgraduate students, gaining valuable experience and insight into the aspirations and issues for international students.

Objective 1: A Sector Built on Quality and Integrity

Regulation of Education Agents

From a student perspective, the definition of an 'agent' differs from that of providers. Students consider any commercial entity assisting with studying abroad and immigration as an 'agent.' These agents do not require registration or need to be linked to any provider. For example, there are many individuals on social media offering direct agent services to students. They even are not based in Australia, do not need to register, nor do they rely on commissions; instead, they charge students directly for their services.

The key issue is that students simply want access to information, and having already paid high tuition fees, they are willing to pay extra for services to avoid mistakes, creating a profit opportunity. Especially today, with the widespread use of social media, these services are offered online, often in the community's language, making them quite covert and lacking regulation.

The current framework does not adequately address many of the misleading, dishonest, and wrongful behaviors typically exhibited by these unregistered entities. The government needs

to recognize this issue and consider how to regulate this gray market. If left unaddressed, reforms targeting registered agents might only increase regulatory costs for legitimate agents while allowing unregistered ones to continue their malpractices without intervention.

Strengthening Regulation Through Feedback Mechanisms

The framework attempts to enhance the regulation of registered agents by focusing on the cooperative relationships between providers and agents. This approach overlooks the students, who as customers, are the most qualified to assess the quality of agents. Currently, there is a lack of mechanisms for students to review these services or to lodge complaints about misleading practices. Effective regulation should be centered around student complaints and feedback to ensure agents adhere strictly to regulations. The government should provide a clear and accessible channel for lodging and addressing complaints. If such a channel exists, it needs to be simplified and made more transparent to ensure students are fully aware of their rights and how to file complaints.

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

Allocation Goals in Education

As student representatives, we do not believe that this so-called allocation can be implemented reasonably and achieve sustainable goals. The government should not be fixated on promoting students' "reasonable" movement and distribution, as the notion of "reasonable" itself is a fallacy. What students learn should be their own decision, unless you do not charge tuition and instead provide scholarships. This is the only way to encourage students to study according to your vision. Otherwise, any method will only lead to one outcome: a pathway exploited by those who are not genuinely interested in studying but are rather seizing immigration opportunities or engaging in illegal employment.

Regulation of International Student Numbers and Financial Support Models

If the government decides to regulate the number of international students at universities, it means that the government needs to design a financial support model for universities based on the number of international students, similar to the one for local students. Simply put, for every international student a university enrolls, the government should provide predetermined financial support. This approach would fundamentally reverse the universities' reliance on income from international students to cover their own financial costs. If such financial support is available, then it is reasonable for the government to set limits on the number of international students that universities can enroll.

The government should not use its administrative orders to regulate a sector in which it does not provide financial support unless it can establish such a connection. More bluntly put, the education sector for international students at Australian universities has already developed into market-driven behavior, though it still operates within a public affairs framework.

Students are calling for a comprehensive review before easily disrupting the existing tacit agreements and rationality formed under current market conditions, especially when the government has not committed to significantly increasing funding in higher education. In fact,

it is the international students who have compensated for this shortfall in funding. Before deciding on reforms, is the government prepared to allocate the necessary funds?

Assumptions about Student Intentions and Immigration

Students would like to inform the government that policy should not be based on the assumption that all students wish to become permanent residents of Australia. Students make their decisions after comprehensive consideration of tuition fees, living costs, education quality, career prospects, international recognition of degrees, university rankings, their home country's demand for international degrees, and immigration opportunities. No one makes such decisions lightly, given the significant financial and opportunity costs involved. The current framework appears to focus predominantly on immigration, overlooking other aspects.

Particularly, students from top universities make rational and complex decisions, and not all of them aim to settle permanently in Australia. Considering Australia's actual need for skilled talent, it is crucial to carefully design the path of reform, avoiding the continual emphasis on students as mere tools for their "skills" while diminishing their roles as contributors to the community. This is detrimental to building a more diverse, inclusive, and progressive society.

Students are expressing concerns about the trend of orienting university international student courses towards skills deemed valuable to Australia's labor market. They wish to reiterate that their primary purpose for attending university is to acquire knowledge. They were informed that Australian universities are international, high-level academic institutions at the forefront of human knowledge. No one was told that their value ultimately lies in becoming so-called 'Skills for Australia.' If this impression is reinforced, the reputation of Australian international education could be severely damaged. Addressing skills shortages should involve offering scholarships and visa pathways to attract students into shortage industries, rather than imposing restrictions or expecting that certain administrative directives can steer students in that direction — this could result in students choosing not to come to Australia at all.

Misunderstandings Regarding Enrollment in different courses

The framework mentions the example of business schools (p. 18), noting that they attract many international students while the demand for business school graduates in Australia is relatively low, seemingly suggesting a desire to regulate the number of international students in business schools. Students believe this is a pure misunderstanding and a narrow-minded idea resulting from ignoring student voices. Australian business schools are inherently large institutions, and they have a high number of students regardless of the international cohort. This is due to Australia being a developed commercial nation whose advancements in the business sector make it an attractive destination for students wishing to study business. This is not a problem; it is an advantage, presenting Australia with the opportunity to engage business leaders from around the world. Fields with fewer international students may be less competitive globally, which might explain why there is less interest in these programs. Alternatively, the lower numbers could be due to inherent limitations on enrollment, such as in medical fields and other professions requiring placements, with limited availability of these placements leading to fewer students being admitted. Additionally, courses such as medicine and law can be expensive, longer in duration, and particularly challenging for non-native English speakers. It is not appropriate to impose regulations simply on the basis of a perceived lack of diversity.

Furthermore, please do not assume that the implementation of certain policies will drive students to enroll in courses that supposedly need more participants, or that they will move from large cities to smaller ones. While these outcomes are possible, they are not the norm. It is more likely that students, especially those with sufficient funds, excellent academic records, and outstanding capabilities who have the option to choose globally, will opt to study in countries other than Australia.

Concern for HDR Students and Visa Restrictions

Especially, careful attention and support should be given to HDR students, who have been overlooked in this round of reforms, such as the inappropriate age restrictions on the 485 visa for HDR students. Students suggest that the government should review policies concerning international students separately for HDR students. This includes exemptions for the 485 visa

restrictions on changing courses — for PhD students, working for a few years and then returning to research is normal and this flexibility is essential.

Concern for impact on international student cohort

The possibility that limiting student numbers might lead to a decline in educational quality and resources. Could more regulations lead universities to pass costs onto students, such as through tuition hikes? Might the already limited support for international students be further postponed due to these restrictions, such as the impact on SSAF fees? Additionally, the rapid introduction of various policies has already alerted and sparked extensive discussions among the international student community, with many students considering leaving or not studying in Australia.

Students welcome the government's concern for accommodation issues. However, considering only accommodation may not be sufficient. Overall, students believe it may be necessary to consider each provider on a case-by-case basis regarding their resources and capacity to accommodate students, and to assess the impact on the community and industry in order to determine an ideal number of students. Students have reservations about whether the government has the capacity to do this. Students would prefer and welcome reforms that are more tailored to the education sector, focusing on the student-to-faculty ratio, curriculum design, teaching evaluation, student satisfaction, the ratio of local to international students, the per capita availability of beds, and facilities such as dining halls and library spaces.

Lack of Effective Consultation with Student Representative Bodies

Students call on the government to adopt more effective and authentic consultation methods for international students when formulating policies affecting them. SUPRA notes that the name of CISA appears in some government documents as a consultant. However, it must point out that CISA has lost contact with its members, at least with its members organizations in New South Wales, and for over three years. Many student representative organizations, including SUPRA, do not recognize CISA as their representative and are not members of

CISA. Therefore, assuming that contacting CISA equates to conducting consultations with international students is irresponsible and detrimental to the quality of policies.

Students suggest forming more effective and authentic consultation mechanisms through *Study Australia* and its branches in each state. They have direct contact with University contact for International students. Student representatives are willing to participate in consultation activities organized around these themes and feel safe and respected.

Students recommend seeking advice directly from our national peak body NUS, CAPA, and major student representative organizations at universities. This system currently operates the best independent student representation mechanism. Although they are not recognized as international student representative organizations, each of these democratically elected bodies has its international student representatives. Those organizations play the role to support international students. This is especially true for the Group of Eight universities, which have a large population of international students. Therefore, we urge the government to increase contact with those independent student representative organizations, which will greatly improve the quality of policies.

Objective 3: Taking Australian Education and Training to the World

Students welcome the ambition demonstrated in this chapter and are pleased to see Australian universities playing a significant role globally. However, we wish to emphasize a fact: the success of Australia's top universities today is largely due to the indispensable contribution of international students. They have provided a significant amount of valuable tuition fees that support the operations of these universities. Additionally, they bring diversity to the community and establish global connections. International students support extensive research and act as vital researchers and scholars, bringing insights and intellectual resources. Maintaining a substantial number of international students and fostering international education has indeed benefited these universities, and international students have also alleviated much of the government's financial burden for higher education. If these

universities were to decline, the ambition of Australian education to impact globally would not be realized.

Students may not have access to data, but we can directly feel the atmosphere, as well as the sentiments, public opinion, viewpoints, and discussions within our community. Currently, international students' confidence and trust in the Australian government are declining, accompanied by a series of intensively introduced policies. A very notable example is that of a student who, at the beginning of last year, was told they would have a five-year visa upon graduation. They made their decision to study here based on this information, starting from July 2023. However, only six months later, they were informed that the visa duration had been reduced to only two years, and if they were over 35 before coming, it would be zero years, and they would not be welcomed. When we talk about global impact and contributions, policy certainty is a crucial aspect, as it reflects the reputation of a government. Since this year, SUPRA's student representatives have encountered many such cases, and we are deeply concerned. This type of case is occurring across universities throughout Australia, and the voices of these students are very prominent and sympathetic within the internet and our community, leading to discussions that further erode the confidence.