



# DRAFT INTERNATIONAL EDUCATION AND SKILLS STRATEGIC FRAMEWORK

University of the Sunshine Coast submission

June 2024

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## Executive Summary

The University of the Sunshine Coast (UniSC) is pleased to provide a submission in response to the *Draft International Education and Skills Strategic Framework* (the Framework).

While UniSC endorses the submissions from Universities Australia (UA) and the Regional Universities Network (RUN), our submission seeks to provide feedback on the Framework based on our experience as a university with campuses located in regional, inner regional and outer metropolitan communities with a relatively small, yet steadily growing, and diverse international student cohort.

UniSC acknowledges and welcomes the Government's recent reforms designed to safeguard the quality and integrity of Australia's international education sector. While supportive of the Government's stated objectives, some of the proposed reforms, particularly those related to managed growth, require further consideration and refinement to avoid unintended consequences. Ensuring the settings are appropriate for universities in regional, inner regional and outer metropolitan communities is particularly important, especially as locally based providers have an important role to play in supporting future workforce needs.

### Recommendations

1. The Government **delay implementation of the more complex elements of the Framework until 2026** to allow sufficient time to understand the impact of other recently introduced international education reforms, for deeper stakeholder consultation and pressure testing of these additional reforms and to support good faith negotiations on the agreed implementation arrangements. **If the final reforms do take effect from 2025, the Government must support the sector with appropriate transition arrangements** to minimise any adverse short-term impacts on providers and students and to maximise the confidence of current and prospective international students in Australia's international education system.
2. The Government acknowledge UniSC's longstanding modest, responsible, and sustainable approach to international student enrolments, ensuring source country diversity and supporting student success and **not apply international student profile caps at either an institutional, location or course level**. This would support UniSC's existing strategy to cap the number of international students at 20 percent of our total student enrolments (currently 11.3 percent), keeping the university under our existing CRICOS cap (around 6,300) and providing the university with essential non-CSP funding (particularly given our main campuses are not eligible for regional loadings) to sustain our existing multi-campus footprint for the benefit of our local communities and industry.
3. The Government **exempt UniSC from international student profile caps at our city-based campuses**.
4. The Government **exempt UniSC from the requirement to establish additional student accommodation as part of our international student growth plans**, given our modest 20 percent target would still see us under our existing CRICOS cap, unless it became clear that sufficient suitable accommodation could not be sourced by our international students.
5. The Government **ensure the Genuine Student requirement enables students seeking career change through non cognate study to be adequately assessed under the previous study criteria**.
6. The Government **exempt university providers from the proposed requirement of having to deliver courses to domestic students for 24 months before seeking to enter the international education market**.
7. The Government **increase the current six month no-transfer period to 12 months** to further protect providers from student poaching.
8. The Government **carefully considers mechanisms allowing access to reputable agents for students with legitimate needs to seek onshore provider transfer**.

9. The Government **exempt non award and sub bachelor higher education courses from any international student profile caps**, given the contribution these courses make to overall student diversification and the clear intention of most students to return home at the completion of their studies.
10. The Government **strengthen regional, inner regional and outer metropolitan differentials for international students**, including post-study work rights in priority skills, skilled work visas and permanent migration pathways.
11. The Government **review and implement a revised loading structure as an element of mission-based compacts** aligned to the contemporary reality of universities operating campuses in inner regional and outer metropolitan locations with high equity student enrolments.
12. The Government **allow international students studying at regional, inner regional and outer metropolitan campuses to choose a higher ratio of blended and/or online content**.
13. The Government **exempt university online international, offshore TNE and TNE students coming to Australia for any part of their study program from any international student profile caps**.
14. The Government **return to assessing student visa risk at a student level for the university sector and cease using institutional risk levels**, given our sector's low level of risk and to mitigate the unintended adverse consequences this policy has had on the sector and genuine prospective students.
15. The Government **urgently invests in PRISMS improvements to:**
  - a. **Prevent the creation of duplicate records.**
  - b. **Increase the transparency of agent performance data** to assist the sector enhance agent management and adhere to their responsibilities under the National Code.
16. The Government **invest in additional campaigns, educative forums and workshops with regional employers**, explaining the process of employing international students.
17. The Government **consider a market entry seed funding initiative to support smaller universities to increase their transnational education offerings**.
18. The Government **increase resourcing dedicated to expanding Australian qualification recognition in global markets and the promotion and recognition of the validity of Australian qualifications offered online**.

## Introduction

The University of the Sunshine Coast (UniSC) is pleased to provide a submission in response to the *Draft International Education and Skills Strategic Framework* (the Framework)<sup>1</sup>.

We would welcome the opportunity to discuss any aspect of our submission in further detail. If this is of interest, please contact Jason Mills, Head of Government Relations, on [jmills3@usc.edu.au](mailto:jmills3@usc.edu.au) or 0415 950 619.

## Response to the Framework

### Objective 1: A Sector Built on Quality and Integrity

UniSC welcomes the Government's recognition that Australia's international education and training sector is a success story with a reputation for excellence, noting the significant contribution international students make to the nation's globalisation, economy and relationships with key partners. Australia is now recognised as a world class education destination and in 2023 the sector contributed \$47.8 billion to the national economy.

While COVID-19 brought disruption to the mobility of students, public messaging around international education and later competitor nation's enhanced visa settings saw Australia fall from second to fifth place behind China, Canada and the UK, with the US being the lead destination. Australian universities worked hard to communicate with our international students, alumni, prospective students and offshore partners and we have seen a strong recovery as a result. However, the global competition for talented, genuine students is significant and Australia can ill afford further poor public messaging in relation to the quality and integrity of our universities. In IDP's most recent survey of over 11,500 students in March 2024, 37 percent of prospective and applied students indicated that government policy updates have a 'very high' or 'high' impact on study abroad destinations. This is reflected in the changes in preferred destination where the US has now taken the lead as the most popular destination, closely followed by Australia, while Canada has now slipped back to fourth place.

While we warmly welcome collaboration with Government around the Framework, it is imperative that we recognise and promote the quality and integrity of our universities, while seeking to take action to prevent the poor practices of unscrupulous providers. Poor public messaging not only creates damage globally but continues to impact our sector's social licence to operate in international education domestically. Support for Australian universities and for international students and their diverse contributions to our country is critical for all Australians.

### Visa processing

UniSC believes that due to the university sector's much lower risk profile, along with the unintended adverse consequences this policy has had, the Government should stop using institutional risk levels for the university sector and revert to assessing student visa risk at a student level. One of the less understood challenges with the current institutional risk allocation model is that visa risk is allotted to the first institution of study and does not follow the student upon transfer. This loophole allows unscrupulous providers to poach onshore students from other providers following the six-month transfer restriction with no impact on their Evidence Level if students breach visa conditions. For this reason, UniSC would also encourage the Government to extend the current six month no-transfer period to 12 months.

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<sup>1</sup> <https://www.education.gov.au/international-education/draft-international-education-and-skills-strategic-framework>

## Recommendations

- *The Government return to assessing student visa risk at a student level for the university sector and cease using institutional risk levels, given our sector's low level of risk and to mitigate the unintended adverse consequences this policy has had on the sector and genuine prospective students.*
- *The Government increase the current six month no-transfer period to 12 months to further protect providers from student poaching.*

## **Onshore agent commissions**

While we understand the Government's desire to ban onshore agent commissions to reduce incentives for unscrupulous agents and providers to 'poach' students, this policy has the potential to negatively impact students with genuine transfer requests. While universities commonly assist students to make changes to their courses where appropriate, we are unable to provide information on programs not offered by our university. So there remains a role for agents in this process e.g. whereby a student wishes to undertake a program not offered at their current institution.

A total ban risks the unintended consequence of leaving students to navigate alternative course avenues legitimately available to them, without comprehensive assistance. Some students may conduct their own research and navigate the transfer between providers without the need for an agent, however there will be a proportion of students who require this service.

## Recommendations

- *The Government carefully considers mechanisms allowing access to reputable agents for students with legitimate needs to seek onshore provider transfer.*

## **New Genuine Student requirement**

UniSC supports the introduction of the Genuine Student requirement although we believe there needs to be sufficient flexibility to ensure genuine students seeking career change through non cognate study are adequately assessed under the previous study criteria. For example, 36 percent of UniSC's current international student enrolments in the Bachelor of Nursing entered via a graduate entry pathway.

## Recommendations

- *The Government ensure the Genuine Student requirement enables students seeking career change through non cognate study to be adequately assessed under the previous study criteria.*

## **Prior delivery of courses to domestic students**

UniSC acknowledges the intent behind the Government's desire to prevent providers seeking to enter the international education market unless they have delivered courses to domestic students for 24 months. However, as universities are globally recognised as ethical and quality providers of higher education services in Australia, they should be exempt from this requirement.

## Recommendations

- *The Government exempt university providers from the proposed requirement of having to deliver courses to domestic students for 24 months before seeking to enter the international education market.*

## PRISMS improvements

UniSC welcomed the Government's closure of the concurrent study function in the Provider Registration and International Student Management System (PRISMS). To strengthen the effectiveness of this change, we encourage the Government to remove the ability to create duplicate records in PRISMS.

Recommendation 13 of the Nixon Review<sup>2</sup> noted the potential adoption of the United States (US) regulation framework for education agents, which through the American International Recruitment Council (AIRC) sets standards and certifies educational agents. It should be noted that this process already occurs through many Australian universities, including UniSC, however we encourage the Government to increase the transparency of agent performance data in PRISMS to assist the sector to enhance agent management and ensure they adhere to their responsibilities under the National Code.

### Recommendations

- *The Government urgently invests in PRISMS improvements to:*
  - a) *Prevent the creation of duplicate records.*
  - b) *Increase the transparency of agent performance data to assist the sector enhance agent management and adhere to their responsibilities under the National Code.*

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

We urge the Government to recognise UniSC's slower trajectory in recovering from the reduction in international student numbers post-COVID-19, particularly when compared with metropolitan universities. From our highest ratio in 2018 of 23 percent international students as a proportion of our total student population, UniSC is on a journey of recovery which will take many years. Capping our modest planned growth at current levels (11.3 percent) or below will severely impact our financial projections (and future sustainability) which currently accommodate the continuation of our regional campuses, research development, digital infrastructure and basic ongoing maintenance.

### **Utilise current systems: CRICOS**

UniSC acknowledges there are currently over 1,400 registered providers across all sectors and that the Government's focus is primarily on integrity and quality issues and to optimise solutions for Australia's skills needs.

As noted in the Framework, historically providers have been able to request the number of enrolments they wish to offer international students, with limits on their capacity to deliver determined by their premises and teaching capacity. The Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) already has established limits (caps) in place. However, given the Department of Education approved an increase in the CRICOS cap from 1,317,195 international students (3 Jan 2024) to 1,514,413 (2 April 2024), UniSC agrees that the CRICOS cap could be more strategically developed in consultation with the sector. It is also important to note that of the 1,514,413 international student places on CRICOS, only 515,205 (34 percent) belong to the 37 Australian public and 5 private universities<sup>3</sup>. There is also significant variation within that number i.e. some of the larger Go8 institutions have allocations of more than 40,000 while UniSC for example has a modest cap of 6,334.

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<sup>2</sup> <https://www.homeaffairs.gov.au/reports-and-pubs/files/nixon-review/nixon-review-exploitation-australia-visa-system.pdf>

<sup>3</sup> [www.data.gov.au](http://www.data.gov.au) and <https://thekoalanews.com/capping-student-numbers-we-already-have-a-system-in-place-why-is-no-one-talking-about-it/>

UniSC intends to maintain its current strategic approach to international student growth, including a modest, sustainable plan to return to a maximum of 20 percent international students as a proportion of our total student population. UniSC's current international students represent 11.3 percent of our total student population. To maintain long term sustainability, the university seeks to grow to 30,000 students by 2034, including 6,000 international students (20 percent) across our regional, inner regional and outer metropolitan campuses. This is less than our current 2024 CRICOS cap.

UniSC believes the Government's managed growth aspirations can be achieved through clearer settings and use of the current CRICOS system.

### Recommendations

- *The Government acknowledge UniSC's longstanding modest, responsible, and sustainable approach to international student enrolments, ensuring source country diversity and supporting student success and not apply international student profile caps at either an institutional, location or course level. This would support UniSC's existing strategy to cap the number of international students at 20 percent of our total student enrolments (currently 11.3 percent), keeping the university under our existing CRICOS cap (around 6,300) and providing the university with essential non-CSP funding (particularly given our main campuses are not eligible for regional loadings) to sustain our existing multi-campus footprint for the benefit of our local communities and industry.*

### **Promoting regional Australia**

While more can be done to support regional Australia, UniSC counsels against the belief that large numbers of international students will select regional study destinations. Multiple university and policy attempts have been implemented with little movement in overall numbers. Some of the common challenges include:

- Connectivity in regional locations lacks regular and coordinated public transport options. Many students rely on personal transport modes.
- The lack of night-time economy compounds perceptions of isolation, especially for students from countries where night-time economies are normalised.
- Regional destinations are not homogenous regarding accommodation, some locations have ample accommodation supply while others have very low vacancy rates.
- Proximity to diaspora is important for some students.
- Proximity to part-time employment or post graduate opportunities (depending upon a student's field of study)

### **UniSC Case Study**

While most onshore international students' study in areas of greater Sydney, Melbourne and Brisbane, in Queensland around 30 percent of arriving overseas students' study on campuses outside of Brisbane, including the Sunshine Coast and Moreton Bay.

Rather than dictate location and course of study, the university has provided services with student choice at the centre and worked closely with industry partners to provide meaningful work integrated learning opportunities - as it does for its domestic cohorts.

The result has been a sustainable and relatively diverse cohort of students to its Sunshine Coast and Moreton Bay campuses to study a wide range of programs including but not limited to nursing, social work, information technology, business, animal ecology and a significant study abroad and sub-bachelor cohort.



Incentivising quality students to study at our regional, inner regional and outer metropolitan campuses does remain a factor for students in their decision-making process. UniSC supports regional differentials, including enhanced post-study work opportunities particularly in areas of priority skills linked to positive discrimination for skilled visa and residency outcomes. These stimulants are important signals to prospective students and to employers in our communities.

#### Recommendations

- *The Government strengthen regional, inner regional and outer metropolitan differentials for international students, including post-study work rights in priority skills, skilled work visas and permanent migration pathways.*

The university has been less successful in attracting students to its Fraser Coast and Gympie campuses due to a lack of regular public transport, night-time economy, regional ageing demographic and course range that can be offered predominantly on-campus to meet ESOS requirements. As Fraser Coast and Gympie are thin domestic markets, the university is unable to offer a comprehensive range of on-campus programs but can offer blended and online delivery opportunities. Consideration should therefore be given to further flexibility in the amount of blended and online content approved for international students studying at regional campuses.

#### Recommendations

- *The Government allow international students studying at regional, inner regional and outer metropolitan campuses to choose a higher ratio of blended and/or online content.*

#### **Metropolitan campuses**

UniSC is proud to be able to offer alternative options to our international students and are looking forward to providing our high-quality student experience<sup>4</sup> through our new Adelaide campus in partnership with ECA. Adelaide was a strategic decision given its regional status, aligning with our Queensland campuses, and recognition that a cohort of our international student population is seeking a CBD experience. UniSC also has potential to provide domestic student programs in areas of State skills need from the campus. UniSC Adelaide allows for essential non-CSP funding to support the viability of our Queensland regional delivery and research.

We note the inequity of restricting regional, inner regional and outer metropolitan universities from participating in city-based education markets, which attract a higher international student population density, while availed by large metros universities with significantly larger CRICOS limits.

In recognition of the need for regional, inner regional and outer metropolitan universities to have a level playing field, UniSC believes that international student profile caps should not apply to our city-based campuses. Our city campus will be managed as part of the universities overall CRICOS designation and be part of the university's self-imposed cap of 20% of its total student population.

#### Recommendations

- *The Government exempt UniSC from international student profile caps at our city-based campuses.*

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<sup>4</sup> <https://www.usc.edu.au/about/key-statistics>

## **Diversification**

UniSC provides an interesting case study in the management of diverse student cohorts by recognising the value of our distinctive campus locations. Through meeting the needs of students, the university has been able to consistently manage source country diversity risk with its top five counties including Nepal, India, Germany, Norway and the USA. Recognising where our students wish to study is a key to this overall success. In general, our North American and European cohorts prefer our Sunshine Coast campus and, many of our South and Southeast Asian students distribute evenly between the Sunshine Coast and outer metropolitan campus at Moreton Bay.

Additionally, UniSC has focused on diversification across study level. We have established a strong network of international partner institutions, primarily throughout Europe and North America and deliver a unique set of higher education diploma programs. Although UniSC actively recruits students into traditional study abroad and exchange programs, our diploma courses allow students to study in Australia for 1-2 semesters with the intention of returning home with credit into their home degree, while gaining an AQF award. For students and partner institutions, these programs offer a strong value-add and we encourage this option for eligible students. Non award and sub-bachelor students represent approximately 30 percent of UniSC's international student commencements and generate approximately \$3.4 million of essential non-CSP funding each year. Sub-bachelor students represent approximately 25 percent of this group. While UniSC's diplomas are not non-award programs, the target markets and student enrolment patterns mirror non-award students and UniSC requests that these sub bachelor programs are not included in the proposed international student profile caps.

## **Recommendations**

- *The Government exempt non award and sub bachelor higher education courses from any international student profile caps, given the contribution these courses make to overall student diversification and the clear intention of most students to return home at the completion of their studies.*

## **Definition of regional**

The Framework notes that Government's approach to managing growth, the size of the sector and number of enrolments in courses and at providers will be enabled by legislative amendments. Furthermore, that the implementation of this approach will consider the need to provide particular support to "regional delivery and regional universities" and that international student profiles will be included as an element of mission-based compacts agreed between universities and the Australian Government.

Clarity is required around the terminology 'regional' and corresponding policy decisions made in this regard. This is particularly important when discussing:

- Provision and cost of delivering services to equity student populations who may not reside within the current 'regional' classification areas
- A university's ability to access to infrastructure funding
- Viability of building of student accommodation
- International student visa conditions.

UniSC currently has six locations registered on CRICOS all of which are considered 'regional' for the purposes of international student visa post study work rights. However, only two of UniSC campuses (Fraser Coast and Gympie) are considered regional by the Department of Education for 'loading' purposes. Regional classification is often synonymous with assumptions that denote high levels of equity student provision, recognising the additional resourcing required to support students. Alongside the social, cultural and community benefits of our international students, the essential non-CSP funding assists the university support a traditionally large domestic equity cohort. Neither of UniSC's main campuses, Sunshine Coast and Moreton Bay, are eligible for regional loading, though students from equity backgrounds make up over 60 percent of our student population.

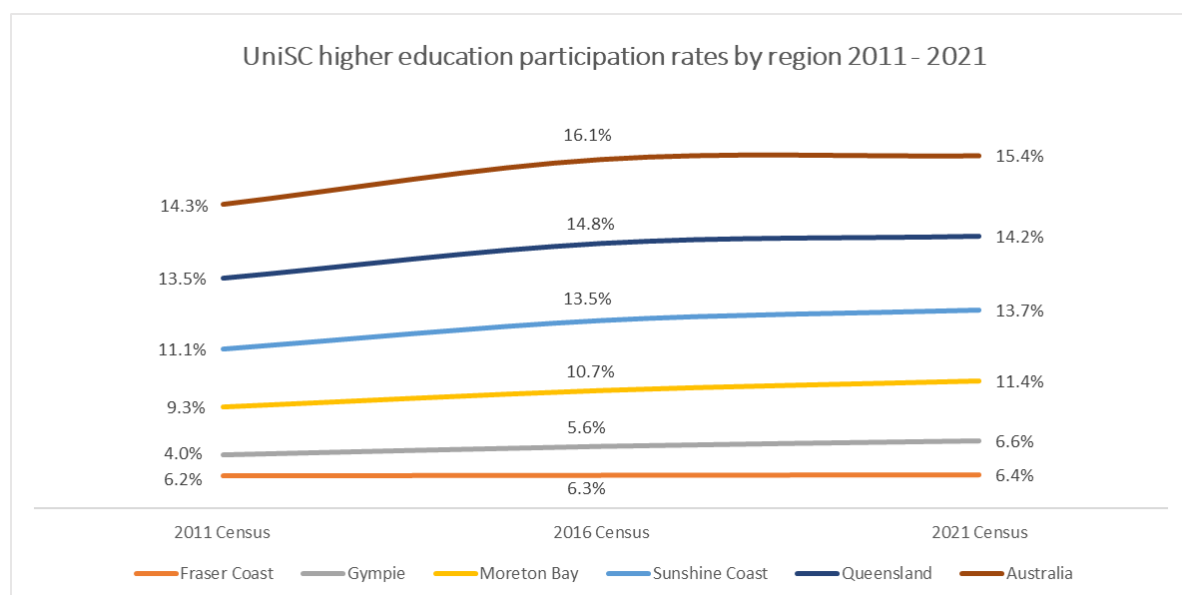
All of our campuses deliver the same services as regionally designated universities, in service to our communities. For example:

- Widening participation activities
- Regional partnership agreements with our local Councils
- Place-based research initiatives responding to regional needs
- Collaboration with local business and SMEs to provide the talent pipeline required for regional economic sustainability
- Collaboration on regional economic development outcome.

Indeed, the establishment of our Sunshine Coast and Moreton Bay campuses were driven by community and local government's desire to lift the low higher education participation rates of their communities. The establishment of these campuses saw a significant lift in participation rates:

- from 1996 to 2021 higher education participation rates in the Sunshine Coast region rose from 1.2 percent to 13.7 percent.
- from 2016 to 2021 higher education participation rates in the Moreton Bay region rose from 10.7 percent to 11.4 percent.

In contrast to the national and Queensland declines since 2016, participation rates in all of UniSC's local government regions have increased over the last three Census' (2011, 2016 and 2021), noting most remain well below the national average.



(Source: ABS Census data)

UniSC argues that the current 'regional' definition used by the Department of Education does not adequately capture the contemporary reality of our inner regional and outer metropolitan campus locations and requirement for loading. We therefore rely on international student revenue to sustain university operations. This poses challenges regarding:

- Funding mechanisms for student accommodation and associated infrastructure costs where domestic student demand does not support a sustainable business case and/or where international student enrolments could be impacted by international student profile caps.
- Parameters to enrol additional students above international student profile caps where the university establishes additional, newly built supply of purpose-built student accommodation.

The funding formula for regional loading should be reviewed and seek to examine broader issues, such as the formula's weighting of levels of equity student provision to recognise Australia's contemporary inner regional and outer metropolitan locations. When allocating support for 'regional delivery and regional universities' in managing growth of international students, that Government ensures this extends to campuses servicing the same domestic equity student profile.

### Recommendations

- *The Government review and implement a revised loading structure as an element of mission-based compacts aligned to the contemporary reality of universities operating campuses in inner regional and outer metropolitan locations with high equity student enrolments.*

### **Course caps**

While supporting the Government desire to align Australia's migration/visa settings more closely to Australia's skills needs, when it comes to setting international student profile caps at a course level, UniSC believes the Government should recall the lessons from the failed Job Ready Graduates package which tried to use pricing signals to influence student choice. Domestic students largely ignored the price differentials and enrolled in courses that made sense to them. We can expect a similar response by international students who will predominantly choose courses aligned to their personal preferences and future career aspirations. If their preferred choices are not available, they will very likely look to another country for their studies.

Furthermore, the proposed power to limit or cease the ability of universities to deliver courses in areas which the Government determines have limited value to Australia's critical skills needs, not only undermines a student's freedom of course choice but does not recognise that over 80 percent of students return to their home countries after their degree program. These alumni are critical ambassadors of our product, contribute to soft diplomacy and to regional economies regarding globalisation, as part-time employees, and as economic contributors. In 2023, UniSC's total international student economic impact contributed over \$126 million to the Sunshine Coast and Moreton Bay economies.

UniSC believes that a better approach would be incentivising international students' course choice through policy related support into appropriate employment pathways in critical skills areas.

## Graduates ready to meet Australia’s skills needs

UniSC ranks fifth in Australia for overall employer satisfaction with their new graduate employees with a score of 88.2 percent, based on combined results for 2021 to 2023 in the annual Australian Government’s Quality Indicators for Learning and Teaching Employer Satisfaction Survey. Our 2023 graduates exceeded the national rate of employer satisfaction overall and across all five key performance indicators<sup>5</sup>. These results stem from the university’s commitment to ensuring Work Integrated Learning (WIL) is a core part of curriculum design, with all undergraduate programs to include a WIL component for students by the end of 2025.

In preparing for discussion on international student profiles as an element of UniSC’s mission-based compact, we point Government to the quality of teaching and learning, work integrated learning, research opportunities and industry and career pathways provided to international students – many of which are in priority skills areas.

### UniSC case study

#### *Nursing - Throughout the Transition to Practice program*

International students can fast-track transition to work-ready graduates– with expanded insights, skills and passion for caring for older people [https://www.youtube.com/watch?v=q\\_16AE0g09A](https://www.youtube.com/watch?v=q_16AE0g09A)

#### *ICT & Cyber security - Microsoft, EC Council, ITS, CISCO embedded certifications and internships*

International student Federico Rusconi discusses his SMEC internship and industry certifications [www.usc.edu.au/international/supercharge-your-career-in-ict](http://www.usc.edu.au/international/supercharge-your-career-in-ict)

To assist quality international graduates remain in the regions to fill skills gaps, there is more work to be done in breaking down barriers to employability with regional business. Regional SMEs often express hesitation in employing recent international graduates, as they lack an understanding of the processes related to visa functions.

### Recommendations

- *The Government invest in additional campaigns, educative forums and workshops with regional employers, explaining the process of employing international students.*

### **Student housing**

The current political discourse linking international student numbers to accommodation shortages is contributing to a decline in community perceptions of international students and a reduction in universities social licence to operate in this space. This public messaging is not accurate, and unhelpful in attracting high quality international students in a competitive market.

As the Property Council of Australia has made clear, international students account for only 4 percent of all renters in Australia with the domestic student population comprising 6.2 percent<sup>6</sup>. Factors external to international students have been impacting rental accommodation availability and affordability and include long term housing demand outpacing supply and net migration from capital cities to regional areas doubling during the COVID-19 pandemic (43,000 people in 2020)<sup>7</sup>.

<sup>5</sup> <https://www.usc.edu.au/about/unisc-news/news-archive/2024/may/employers-give-top-marks-to-unisc-graduates>

<sup>6</sup> <https://www.propertycouncil.com.au/submissions/myth-busting-international-students-role-in-the-rental-crisis>

<sup>7</sup> <https://www.propertycouncil.com.au/submissions/myth-busting-international-students-role-in-the-rental-crisis>

Between June 2019 and June 2023, the median rent increased by 24 percent, while only 4 percent more international students lived in Australia. Conversely, between June and October 2023, the median rent increased by 5 percent, where over the same period there was an 18 percent increase in international students living in Australia<sup>8</sup>. The majority of renters are couples, single parents or lone person households who are not international student visa holders<sup>9</sup>.

UniSC has a modest approach to international student growth, is an EL1 provider, operates in regional, inner regional and outer metropolitan settings with over 60 percent% of the student population represented in equity groups and a history of successfully raising higher education participating rates in our communities. As a quality public university, we would argue for an exemption to the requirement to establish an additional, new supply of purpose-built student accommodation where UniSC wished to enrol international students above a pre-determined limit – especially were that limit to be set below our request of 20 percent of our total student population which would still see us under our existing CRICOS cap.

If it became clear that sufficient suitable accommodation could not be sourced by our international students then Government support would likely be required to fund purpose-built student accommodation given the limited financial resources of small universities like UniSC and the commercial challenges private providers face when looking to establish in regional, inner regional and outer metropolitan centres.

#### Recommendations

- *The Government exempt UniSC from the requirement to establish additional student accommodation as part of our international student growth plans, given our modest 20 percent target would still see us under our existing CRICOS cap, unless it became clear that sufficient suitable accommodation could not be sourced by our international students.*

#### **Transition arrangements**

UniSC believes the Government should delay implementation of the more complex elements of the Framework until 2026 to allow sufficient time to understand the impact of other recently introduced international education reforms, for deeper stakeholder consultation and pressure testing of these additional reforms and to support good faith negotiations on the agreed implementation arrangements.

If the final reforms take affect from 2025, the Government must support the sector with appropriate transition arrangements such as those articulated in the Regional Universities Network submission.

#### Recommendations

- *The Government delay implementation of the more complex elements of the Framework until 2026 to allow sufficient time to understand the impact of other recently introduced international education reforms, for deeper stakeholder consultation and pressure testing of these additional reforms and to support good faith negotiations on the agreed implementation arrangements. If the final reforms do take affect from 2025, the Government must support the sector with appropriate transition arrangements to minimise any adverse short-term impacts on providers and students and to maximise the confidence of current and prospective international students in Australia's international education system.*

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<sup>8</sup> <https://www.propertycouncil.com.au/submissions/myth-busting-international-students-role-in-the-rental-crisis>

<sup>9</sup> <https://go8.edu.au/media-release-capping-international-students-will-not-fix-housing-affordability-or-supply>

### Objective 3: Taking Australian Education and Training to the World

While the potential benefits associated with transnational education (TNE) can be beneficial and there are examples of success, it is not a viable replacement for the essential non-CSP funding and globalisation benefits that are provided by international students studying onshore. TNE remains high risk for universities, often expensive to enter, with long lead times on returns (often minimal) coupled with long establishment pipelines.

It requires considerable planning to navigate common challenges, well recognised by the sector, which include:

- University's appetite for risk (reputation and risk)
- Projected student intakes, completion and retention rates
- Projected return on investment or profit to justify the commitment to engage
- Ability (or commonly inability) to ensure projected return on investment can be repatriated
- Quality assurance and consistency of academic standards (enrolment, moderation and assessment)
- Navigation of regulatory frameworks, cultural expectations
- Recognition and accreditation of qualifications in home countries and portability
- Legal, financial, political and cultural considerations and cost of undertaking
- Staffing and student support in country to ensure quality
- Local government regulatory issues, restrictions on foreign investment
- Restriction on institution type - only accepting universities with particular ranking criteria
- Complex variables, difficult to cost.

#### **Government support for transnational education**

Most smaller universities do not have significant offshore staff to assist with relationship development, and while Austrade is of assistance at a macro level, on the ground realities require more detailed assessment. A Government seed funding model would assist smaller universities to move beyond partner identification, toward the operational realities and nature of contractual arrangements for new offshore partnerships.

The Government undertakes critical work in expanding Australian qualification recognition in global markets, however more resources are needed in global markets for the promotion and recognition of the validity of Australian qualifications offered online.

#### Recommendations

- *The Government exempt university online international, offshore TNE and TNE students coming to Australia for any part of their study program from any international student profile caps.*
- *The Government consider a market entry seed funding initiative to support smaller universities to increase their transnational education offerings.*
- *The Government increase resourcing dedicated to expanding Australian qualification recognition in global markets and the promotion and recognition of the validity of Australian qualifications offered online.*

## Attachments

1 – Letter of support from Sunshine Coast Council



13 June 2024

Professor Helen Bartlett  
University of the Sunshine Coast

Dear Professor Bartlett,

### **Letter of support: Submission to Federal Government's Draft International Framework**

Sunshine Coast Council is pleased to support the University of the Sunshine Coast (UniSC) submission in response to the Federal Government's Draft International Framework, particularly their recommendations and concern regarding a cap to international students electing to study across their campuses.

Sunshine Coast Council supports the university's self-imposed policy to cap the number of international students at 20% of its total student enrolment, to maintain a uniquely Australian international study experience. International students contribute to our vibrant community, providing talent for local business and enhancing the globalisation of our city, recognising the social, cultural and financial contribution that international students make to UniSC and its ongoing sustainability.

Since UniSC's establishment, our region has seen a significant lift in higher education participation rates from 1.2% in 1996 to 13.7% in 2021, further highlighting the importance of UniSC's sustainable outcomes for local workforce and community. Council supports UniSC's call for regional differentials, including enhanced post-study work opportunities particularly in areas of priority skills.

While most onshore international students study in areas of greater Sydney, Melbourne and Brisbane, around 30% of arriving overseas students study on campuses outside of Brisbane, including the Sunshine Coast.

International students are an integral part of our workforce ecosystem, particularly in health where 35% of international students on the Sunshine Coast campus are studying nursing, undertaking work integrated learning in our hospitals and contributing to skills gap solutions. Additionally, international students in tourism, events and hospitality bring diversity and innovation to local business.

The Sunshine Coast Regional Economic Development Strategy highlights talent and skills as a key strategic pathway to grow our economy with a focus on collaboration with education and training providers and industry partners to attract international students to achieve this.



Sunshine Coast Council supports the Study Sunshine Coast cluster and assists Study Queensland in achieving its vision outlined in the Queensland International Education and Training Strategy 2022 - 2027 by positioning Queensland as an education destination of choice, by providing meaningful experiences for the sector, facilitating global networks and highlighting career pathways for students, supporting the economic resurgence, talent attraction and international visitation.

Council values the experience and skills our international students gain through studying on the Sunshine Coast, which can contribute to communities and workforces in both Queensland and across the region. Sunshine Coast Council looks forward to working collaboratively with UniSC into the future and supports their recommendations through the submission of this feedback, demonstrating the critical need to support international students electing to study in Queensland and across Australia.

Yours sincerely



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SUNSHINE COAST COUNCIL

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