



TAFE Directors Australia

Submission in response to Australian Strategy for International Education 2021-2030

TAFE Directors Australia (TDA) is pleased to make this submission in response to the discussion paper seeking feedback on the *Australian Strategy for International Education 2021-2030*.

TDA is the national association for TAFEs and TAFE divisions of dual sector universities in Australia, the majority of which deliver a range of courses to international students, both onshore and offshore. TDA congratulates the Council for International Education for instigating the consultation through the Expert Panel and seeking a transformative agenda for international education.

This submission is in three parts. The first part provides a broader perspective that TDA believes needs to inform the strategy with the second part providing an overview of the international education landscape, from a vocational education and training (VET) and TAFE perspective. The third part provides views on specific actions as part of the rebuilding international education.

TDA notes that many of the elements of this submission respond to the questions asked in the discussion paper.

The views in this submission are those of TDA in presenting a national perspective. TDA members may make separate submissions and present different views.

Part 1 – A broad perspective

A ten-year horizon for the international strategy is welcome as it provides an opportunity to consider new priorities for strengthening international education in addition to recovery from COVID disruptions.

The use of a strategy as the tool to coalesce action to support the ongoing development of Australia's approach to international education is supported given the multi-faceted nature of the sector and the range of government agencies and organisations involved.

The need for a reset of international education was evident before COVID

Australian international education is facing significant challenges. As described in the consultation paper, it has been severely impacted by the COVID-19 crisis, particularly by border closures and restrictions on face-to-face learning. While these disruptions may have been the trigger for the reset of the strategy, there were signs before the pandemic that the sector would be facing challenges. These include growing geo-political tensions and signs of break points in global trade impacting student flows and new areas of competition from new countries as well as global edutech products and Industry 4.0 putting pressure on the relative merits of our education and training products.

The impact of the large cohort of international students in Australia was also subject to policy discourse in the context of population policy and the flow-on impacts on infrastructure and labour market participation opportunities for Australians.

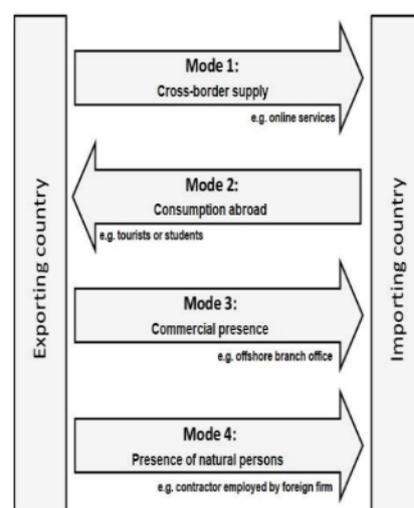
That aside, the international education industry has been a major contribution to the economic success of Australia. Revenues to Australian businesses and education institutions are well documented. International students in Australia also play a key role in meeting short-term workforce demand while they study here and have been the source for filling skilled occupations thanks to post-study work rights and skilled migration policies. This is before broader diplomatic and trade benefits are considered.

TDA submits that the flow of international students and international delivery can be the flywheel for economic recovery and value-add productivity for the wider benefit of all Australians. However, the broader impacts and spill-over benefits need to be crafted as context for the strategy.

A multi-lateral trade perspective may assist in scoping the strategy

The General Agreement of Trade in Services (GATS) description of the four modes of supply of services (as shown in the diagram) provides a useful framework for considering the positioning of international education in Australia over the longer term. The four modes are described below for the Australian context:

The 4 modes of services trade supply



1. **Cross-border supply** – Australia delivering proprietary services to other nations like TAFE delivery in other countries or Australian universities establishing off-shore;
2. **Consumption abroad** – Australia delivering services to visiting consumers such as tourists and international students;
3. **Commercial presence** – Australian firms and education providers operating in another country within their rules and legislation; and
4. **Movement of natural persons** – Australians delivering services in other countries such as a trainer delivering training and advice until such time they are regarded as a resident in that country.

Too easily sector narrative and policy is fixated by the stream of students to Australia, although this is understandable given the significance of this mode of trade.

The final strategy would benefit in considering these wider perspectives and would set a broader context within which international education can be considered. The modes help thinking about other transactions available to support international education, especially if the flow of students is volatile over the next 5 years as countries recover from the pandemic at different rates.

More importantly, GATS serves as a reminder that just as Australia is continuing to build its international education so are many other countries, and beyond Australia's traditional competitor nations. This competition can only be expected to increase, especially as a larger share of the global population will expect some form of foreign education experience.

International education is a powerful diplomatic tool

Beyond the commercial benefits for Australian education providers, international education is an important tool in strengthening ties between Australia and key partner countries, particularly in the Indo-Pacific region.

Government-to-Government and institute-to-institute collaboration helps develop education systems and capabilities to build human capital, economic growth and stability. It also contributes to developing personal, cultural and linguistic ties between Australia and the wide network of alumni once they are back in their countries of origin. International Education supports partner countries in responding to the challenges they are facing, such as responding to the COVID-19 pandemic and adapting technologies to deal with climate change.

Australia has a strong track record of education cooperation through programs such as the Colombo Plan. Over 20,000 students came to study in Australia up to the 1980s, with the intention that upon returning home they would assist their home countries' technological, economic, social and political development¹ and the Colombo Plan is widely credited for the close cooperation between Australia and Asia. However, as described by the Lowy Institute, 'over time, the economic drive as a rationale for building international education as an industry in Australia has taken precedence over the auxiliary role it has played – and continues to play – in maintaining and promoting Australia's interests within a rapidly changing Asia²'. The New Colombo Plan also aims for 'deepening Australia's relationships in the region, both at the individual level and through expanding university, business and other links'³, however, over time the focus has reverted to sending Australian undergraduates overseas at the expense of overseas students coming to Australia.

Geo-political pressures are bringing changes to Australia's diplomacy with a renewed focus in the Indo-Pacific region. At the same time some countries new to international education are developing source countries based on geo-political alignments. Others deliver offshore to develop capability for their companies to expand operations into that country or to support their foreign direct investment. These programs are popular with local learners as they can lead to high quality employment.

These add weight to international education being harnessed more directly as a diplomacy and development tool in addition to export earning.

Australia's education offerings - liberal, professional and vocational - should be regarded as tools for enhancing economic and social systems and individual advancement and enlightenment. While these may appear to be lofty ideals removed from the current realities facing international education they serve as a reminder of the broader significance of international education.

Capability must be front and centre

As the consultation paper highlights, Australia's ongoing attractiveness as a source for international education will be based on its standing in education, training and research. The strategy should clearly position Australia as the source of premium education, training and research in line with its longstanding reputation.

¹ National Archives of Australia, <https://www.destinationaustralia.gov.au/stories/work-play/colombo-plan>

² <https://www.lowyinstitute.org/the-interpreter/what-we-have-lost-international-education-and-public-diplomacy>

³ <https://www.dfat.gov.au/people-to-people/new-colombo-plan/about/Pages/about>

The relative rate and depth of human capital in Australia usually places it into the top 10 nations in most global education measures⁴ and has been the bedrock for competitive advantage. Unfortunately, these standings are under threat if Australia's poor showing in the latest OCED PISA studies for 15-year-olds is a portend⁵. This is further compounded for Australian vocational education qualifications where only Diploma level qualifications are categorised by the OECD as tertiary post-school level. The high rate of participation in higher education is the bulwark that keeps Australia at its current levels.

A leading commentator recently lamented that Australia has let its reputation for quality education slip due to the broad range of providers in the market and the risk to the reputation for quality vocational education sacrificed for easy work rights⁶. The recent announcement to relax work restrictions for international students in labour shortage areas, while seeking to respond to extenuating circumstances, risks reinforcing this position.

International Education should respond to global demand for capability

The consultation paper rightly signals the need for diversification within international education.

The higher education sector in Australia is well placed to continue to attract students on its own merits. Even though most countries, including prospective source countries, have developed their higher education sector (with their universities emerging on global rankings) it is assumed that many families will still plan for their children to have an international experience.

The stronger demand which has great potential is the need globally for higher order professional technical skills. Most emerging economies recognise they need to strengthen this part of their skills profile, often involving moving workers from the informal sector into intermediate level occupations, to move up economic value-chains. This presents opportunities on a broad scale. Firstly, professional technical education is required to prepare people for these roles. Secondly, their technical education systems are under-developed and often captured by bureaucratic interests and they need capability development.

The diffusion of automation, digitisation and artificial intelligence will also impact most countries. Emerging economies which can harness new workforce capabilities to support these technologies can leapfrog advanced economies. For example, the Asian Development Bank has modelled for several emerging Asian economies the workforce impacts and economic returns from adopting these technologies⁷.

Over time, these strategies create higher wages and higher value-add activity which generates local consumption demand open to be met through trade and further professional technical education. In a competitive trading climate, especially for skills, the priority for Australia is to be at the forefront of technology adaptation and pedagogy for developing effective workers.

⁴ For example, even though Australia has slipped two places in the Global Competitiveness Index from 14th to 16th for human capital it rates 13th globally - http://www3.weforum.org/docs/WEF_TheGlobalCompetitivenessReport2019.pdf

⁵ <https://www.educationmattersmag.com.au/australia-drop-in-pisa-rankings-should-we-worried/>

⁶ Abul Rizvi: "By allowing unlimited work in these industries, the Morrison Government now fully supports the idea student visas are just low skill work visas in disguise — something low-quality international education providers have encouraged for years. It also makes a farce of the "genuine temporary entrant" requirement". See:

<https://independentaustralia.net/politics/politics-display/new-immigration-minister-trashes-australias-international-education-industry.15094>

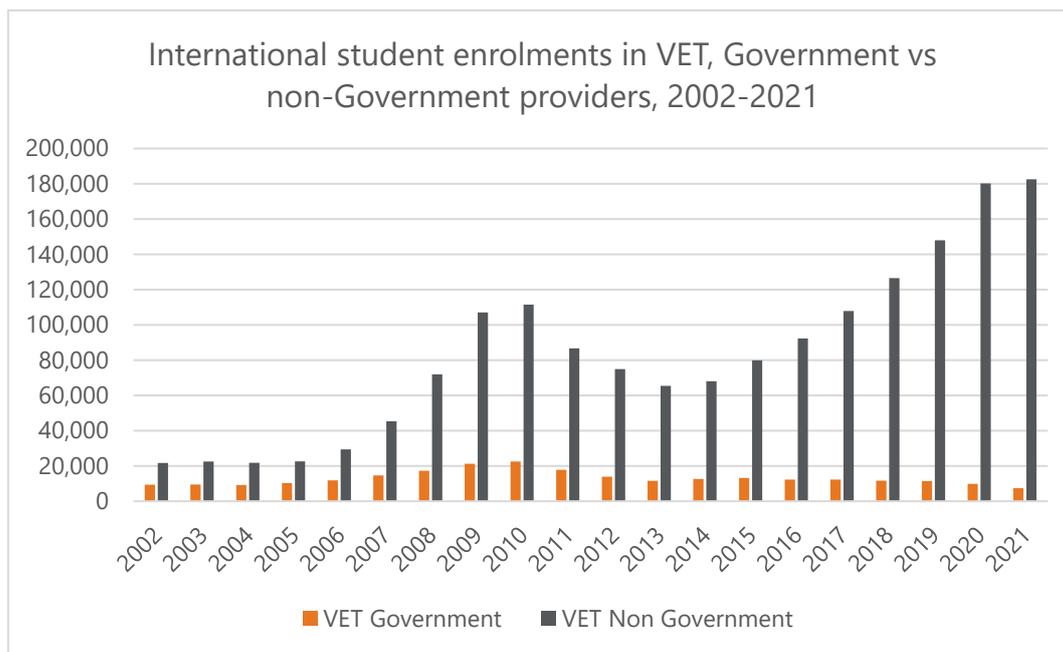
⁷ See Vietnam - <https://www.adb.org/publications/benefits-industry-skills-development-viet-nam>

Part 2 – VET International Activity

International VET has grown rapidly over the last eight years but at a price

The number of international students enrolled in the vocational education and training sector in Australia has grown rapidly since 2013-2014 (as shown in the graph below) following the decline in numbers when migration settings changed as a response to the 'student crisis'⁸. Growth has been pronounced in non-TAFE providers.

The VET sector represented 29% of international enrolments and 28% of commencements in 2020 and 34% of enrolments and 37% of commencements in early 2021.

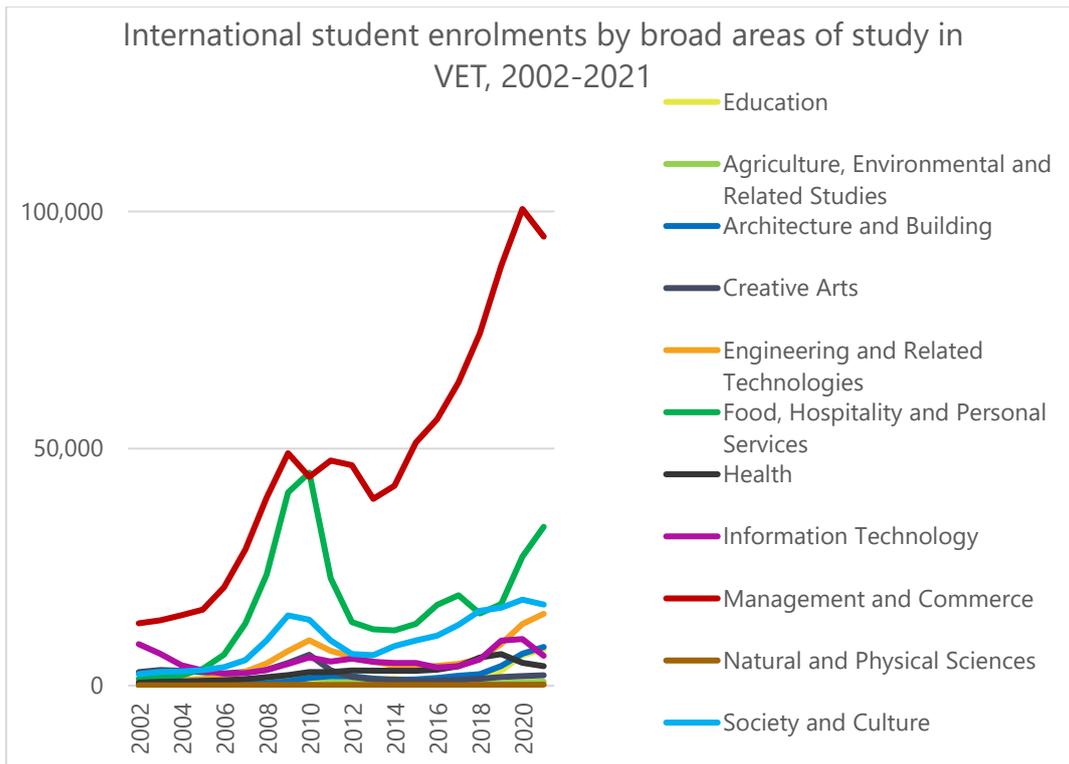


Source: MIP data, Austrade

There are many reasons for the rapid growth in VET sector activity. Even though off-shore student flows have been stalled since early 2020 the growth in VET enrolments represents students changing sectors or enrolment from temporary resident holders. . In addition, there is strong on-shore recruitment activity between providers with too many instances of students being lured on the basis of reduced fees when the original provider has carried the cost and risk for recruiting the student from overseas. It is however difficult to get a comprehensive picture on this behaviour to assess the impact on the integrity of international education settings because of dispersed responsibilities and data holdings.

The concentration of international VET activity in Management and Commerce and Society and Culture (see graph below) adds further weight to arguments that could be put that there are too many examples of enrolment in VET as a means to access work. Regular commentary to this effect indicates the issue is worth canvassing in preparing the strategy.

⁸ Sometimes referred to as the Indian Student Crisis where there were instances of violence to some students. † The growth prior to that point had been due to new colleges opening to offer VET courses that aligned with migration settings which support permanent residency outcomes.



Source: MIP data, Austrade

Price and quality transparency also appears to be a problem. Feedback from many quality providers in VET indicates they are faced with students asking for transfer on price grounds when it is known the fee discount can only be offered on the basis of compromised quality of delivery.

The downstream effects on the rest of the sector should not be underestimated, especially if the diversification and quality standard aspects identified for the strategy are to be met. There are many opportunities for expansion for quality VET, however, the resultant regulatory overload or visa processing decisions⁹ constrains capacity to take these up.

Maintaining quality delivery and supporting standards for those seeking to do the right thing is a challenge when students can be lost in this way. While this may be ascribed as the lack of a quality education culture in segments of the VET sector, the underlying cause is the opportunistic business attitude of some providers at the expense of quality and students. Unfortunately, these behaviours are too often caught, if they are caught, after the event. Despite recent and planned reforms to regulation and monitoring there has been little effort to deal with the root causes¹⁰.

The lack of a fair and consistent regulatory field, particularly for VET, hinders investment in growth or innovation and raises integrity concerns for Australia. Recurring closures or feedback across the student community of easy study requirements diminishes Australia's reputation. These issues need to be addressed in a serious way if the longer term aspirations for international education are to be met.

⁹ Grant rates for VET applicants outside of Australia were 57.7% between 1 January and 31 March 2020, compared to 91.9% in Higher Education for the same period.

¹⁰ The reasons can be many, but it is the view of TDA that at the core is the easy path to assessment with little need for delivery, available through the competency model.

TAFEs have targeted international activity

International education activities are significant at a TAFE level.

TAFEs` share of international students stands apart from trends in domestic VET enrolments where TAFE represents over 60% of students and over 70% of student load in publicly funded activity.

Australian TAFEs also delivery higher education to international students, with its share of similar proportions to that for international VET students.

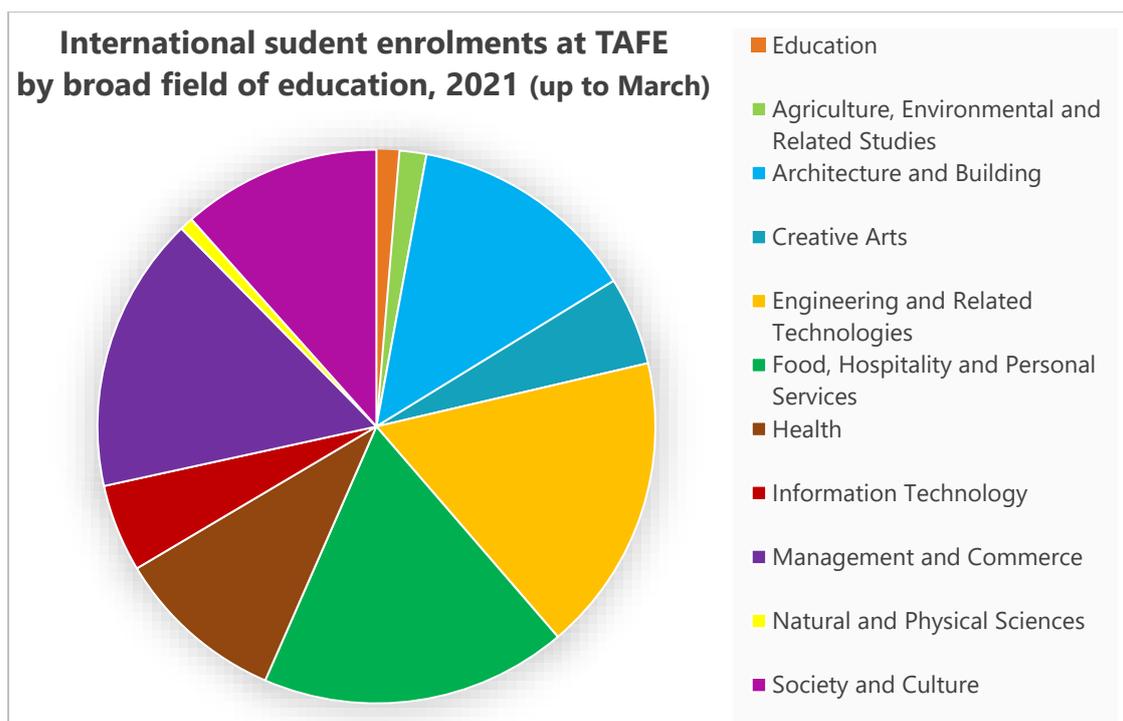
TAFEs are active in other modes of delivery of educational services internationally, including:

- transnational supply of education, for example through the delivery of online courses or advice to offshore learners;
- commercial presence, for instance through the establishment of education institutes in partnership with offshore organisations or partnering with local institutions for the delivery of Australian courses; and
- movement of natural persons, through the delivery of educational services overseas by TAFE experts.

TAFEs have extensive and long term partnerships across the region, including in China, South Korea, Japan, Vietnam, Indonesia, Sri Lanka and across the Pacific. In 2019, 19,808 students were studying offshore with an Australian TAFE. International partnerships include the delivery of accredited and non-accredited courses, trainer and student exchanges and study tours.

TAFEs provide a diverse and supportive education experience

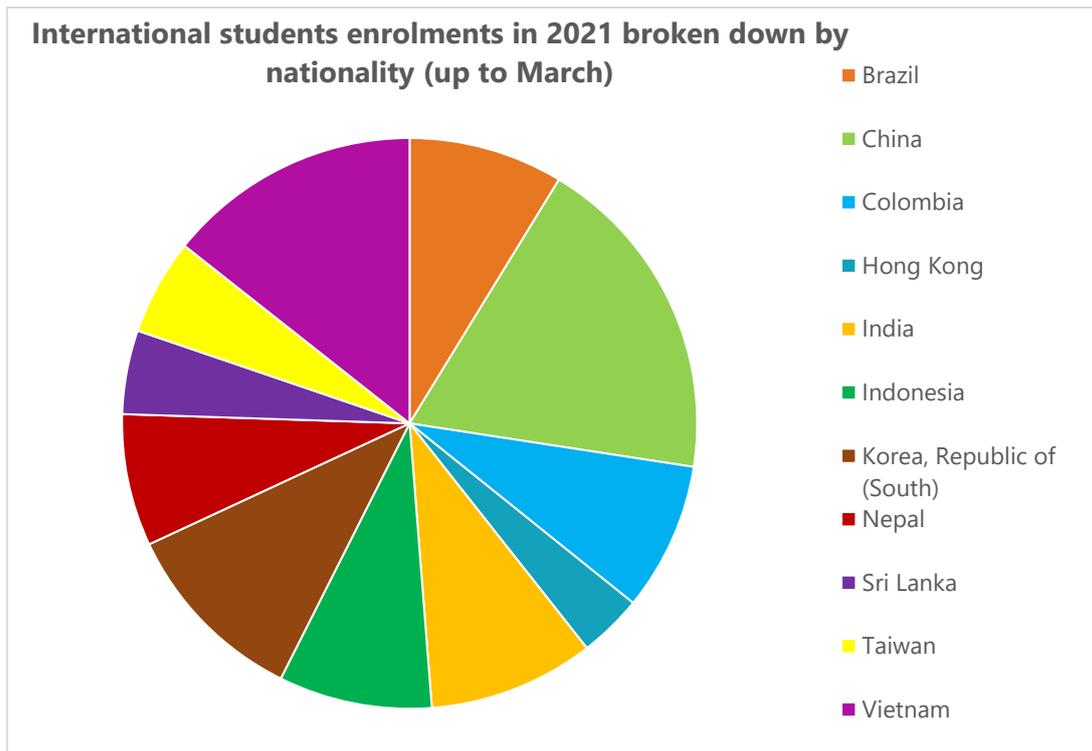
TAFEs also offer a diversified suite of courses to international students, with the leading fields of education in 2021 being: Food, Hospitality and Personal Services (18% of enrolments); followed by Engineering and Related Technologies (17%); with Management and Commerce coming third (at 16% of enrolments) and Architecture and Building (13%) and Health (10%) also among the most popular courses – see figure below.



Source: MIP data, Austrade

TAFEs provide a range of study locations, in metropolitan and regional centre, offering an immersive experience of living in local communities. Thanks to the strong working relationships that TAFEs have with industry, students can also access genuine work experiences and work placements during their studies in Australia.

TAFEs recruit students from a range of countries (see graph below) and due to their size can embed international students in regular classes, enriching the learning experience. International students can also access the full suite of student well-being and support services available to domestic students. These services were key to supporting international students during the lock-down periods due to COVID-19 in 2020.



Source: MIP data, Austrade

TAFEs also provide support for circular labour mobility, particularly in the Pacific region. The Australian Pacific Training Coalition operating out of Fiji and facilitated by TAFE Queensland is an example of a deliberative skilling strategy which develops workers to Australian skills standards who can then work in Australia and in their home country on cycle in line with demand. This way repatriations to local communities are high.

Part 3 – Recommendations

The 10 year horizon for the strategy provides a platform for major changes to the approach to international education. First order, however, is to rebuild the standing of international education for current and potential students to Australia.

Reaffirm Australia’s commitment to international education by setting a plan for students to return

There is no doubt that border closures to sustain public health during the uncontrolled spread of COVID-19 have been necessary. They appear to be an important defence for the immediate future while there are risks of exposure to COVID variants before adequate levels of community immunity are built.

The impact on the flow of students to Australia appears to have created the risk of prospective students seeking out other countries for their international education experience. According to the International Student Crossroads survey released by IDP Connect in April 2021¹¹, the percentage of students willing to change study destinations is now growing because they want the face-to-face experience. Only 54% of surveyed students were willing to defer up to 12 months or less before changing their plans or exploring other study options.

Australia would benefit from stronger messages to prospective students about the conditions and potential timeframe for passage to Australia, recognising that public health is paramount. It is important the message is consistent from all levels of government. Paradoxically, health safety is expected to be a strong attraction tool so the messages about preparation for entry to Australia are important. Engagement in global collaboration on vaccine passports is also critical and will complement the student return plans of states and territories.

A normative expectation from international education should drive the strategy

Moving beyond the immediate messaging, the prospects for Australia’s international education are bright provided a pro-active and connected agenda can be crafted to grasp the wider range of possibilities available. Too often international education is regarded as an add-on to current approaches to education and training within Australia which compromises the agenda for international education.

Many of the recommendations that follow are based on this recommended approach.

Advocate for a broad-based national policy

The strategy would benefit by placing international education in a broad-based context. As a country committed to open trading and the global rules-based order, there is merit in casting international education (onshore and offshore education and student exchange) as a powerful strategic lever for Australia.

There are many dimensions to be considered, including its role in diplomacy and aid, in supporting export opportunities for Australian firms and in building economic capabilities in countries that over time generate further trade opportunities for Australia.

¹¹ IDP Connect Crossroads IV, <https://www.idp-connect.com/newspage/editors-choice/crossroadsiv-international-students-remain-willing-to-quarantine-and-get-vaccinated-for-in-country-experience>

Governments at both levels facilitate the success of international education. The Commonwealth has responsibilities for flow of students and the regulation of providers and accreditation while states and territories, with planning and economic development responsibilities, play a key role in student amenity and experience.

These elements need to work together within the broader diplomatic, aid and trade perspectives if success is to be achieved. The extent to which the 'Australia' brand has been tarnished by what appeared to be a disjointed response across levels of government to student welfare and support during the COVID-19 disruption is enough to justify developing a joint national policy for the rebuild of international education.

The rebuild is of such significance to economic recovery and stabilisation of the education and training sector that the panel should also consider the place of an inter-government agreement to unify policy across levels of government and to be facilitated through a sub-committee of National Cabinet.

Advocate a new social compact for international education

Policy action and narrative can all too often focus on the flow of international students and the benefits to Australian institutions. This invites criticism and claims of crowding out opportunities for Australians, both in education and work. Australian households have the right to be concerned about the impact of the flow of international students on the opportunities for their family members and infrastructure and classroom crowding.

Benefits would be derived if the Expert Panel could commission work to develop messaging about the broader benefits of international education. Messages could be crafted as a compact with the community about the flow-on benefits to Australia.

The Lowy Institute makes a similar point:

A strategic, long-term public diplomacy strategy for international higher education in Australia would include leadership and focus on "domestic diplomacy". That is, ensuring that the Australian public – both inside and outside of educational institutions – are aware of the wider international relations role of education and the contribution of international students outside of university coffers.¹²

Beyond international relations, international students stimulate economic activity which opens more job opportunities.

Messages matter and are critical for establishing authenticity for the industry. Consistent messaging from political and other leaders can play a large part in building commitment to international education.

Establish an oversight commission

As part of considering the national policy, a national commission should be established for prudential oversight of the industry, as well as the channel for data driven advice to governments and to support exploration of new areas of growth.

Before COVID, the rate of growth of international students was raising concerns about the sector's capacity to ensure quality education and training. Public acceptance was also put at risk. Prudential

¹²<https://www.lowyinstitute.org/the-interpreter/what-we-have-lost-international-education-and-public-diplomacy>

oversight, therefore, could consider the overall number and location of international students considering broader impacts on infrastructure and labour markets¹³. The deep data analysis available through the National Skills Commission for domestic labour demand is an example of the approach which could be adopted by a commission. A solid data source would strengthen communication to the community about the need for skilled migration outcomes through international education. The commission can also undertake demand analytics for providers to use to make investment decisions. Importantly, it would need authority to guide actions across agencies to facilitate joint action.

The prudential role also puts a focus on responsiveness of regulatory settings aimed at maintaining a stable and viable sector. This can give confidence to education and training providers to invest in new areas of activity¹⁴.

Accelerate response to global demand for higher order technical capabilities by standing-up a new class of tertiary education

Competitor countries are preparing to bring new higher order technical skills and capabilities to their citizens in view of the sweep of Industry 4.0 through production and services processes and its impact on jobs. These countries will also be well placed to respond to this demand globally. If Australia does not act, it risks missing this opportunity.

It may be argued that the current VET system is set up for this outcome. However, the reputation of some segments of the sector and recurrent episodes of poor delivery and unethical practices result in regulatory restraints which limit adaptability and innovation, particularly for quality providers set up for these opportunities.

Further, the current competency-based model of qualifications aligned tightly to Australian occupations, limits flexibility and adaptability to meet these emerging global requirements. Many regulatory rules, such as teacher requirements, are framed in a domestic delivery context and limit delivery options. The long timeframes involved in reaching agreement on national VET qualifications also has Australia lagging competitor countries.

A new capability needs to be stood up to access these emerging opportunities. It would not substitute current vocational education but allow for authorised providers to supplement delivery to meet the real demand of these countries, through on and offshore delivery.

There is precedent for such actions. The review of higher education provider category standards by Professor Coaldrake¹⁵ demonstrates the policy merit of categories and *Future Skills for Victoria – Driving collaboration and innovation in post-secondary education and training*, the review conducted by Jenny Macklin¹⁶, recommends categories for the VET sector.

This capacity is no different to that available to self-accrediting higher education providers. Failure to respond limits genuine trade opportunities and avenues for diplomatic support to other countries.

¹³ The disruption to international education in 2009 and 2010 demonstrates that uncontrolled growth can have detrimental consequences to the reputation of the industry. Monitoring may have moderated many of these impacts.

¹⁴ This was a key message in *Strengthening Skills*, the report on VET by the Hon Stephen Joyce from early 2019 for VET to recover and applies equally, if not more, to international education.

¹⁵ <https://www.dese.gov.au/quality-and-legislative-frameworks/review-higher-education-provider-category-standards>

¹⁶ <https://www.education.vic.gov.au/about/department/Pages/macklin-review.aspx>

The new category would allow governments to promote capability offshore with assurance of integrity and quality outcomes. Access to the category would be subject to regulatory decision but should be shared with states and territories to complement their efforts in international education and development.

Boost offshore VET for diplomatic purposes and downstream effects

Benefits from international education are two-way when considered in a diplomatic and trade context. Just as markets need to be primed, the same is needed for international education.

There is still demand for Australian vocational education in many overseas countries, despite the episodes of poor practices in Australia. TAFEs are sought out based on their standing globally for high quality contemporary vocational practices and teaching. These opportunities are a challenge to take up due to upfront costs and uncertainties of return germane in foreign markets.

The significant opportunities in this area in the neighbourhood warrants a large focus within the strategy. The Australia Pacific Training Coalition is a direct example of the demand for skills. At this stage it is difficult to quantify other opportunities and assess the suitability of the Australian offer, however, the experience of TAFEs would suggest the level of expressed demand warrants major investigation of the opportunities. Clearly, the place of public investment to deal with the investment risk needs to be examined.

This is also an area where collaboration with states and territories could yield results as they are able to harness the effort of TAFEs and providers to address demands offshore, whether it be whole-of-country or sub-region, industry sector, or institution.

This priority should be a major focus of the Overseas Counsellor network and the Austrade network. Structural reform should be considered as Australia looks disjointed in their engagement offshore compared to other countries. This, along with limited investment funds, means many opportunities are lost.

Overtime, and as recommended elsewhere in this submission, accreditation and regulation requirements need to be adjusted to facilitate taking up these opportunities.

In the meantime, other initiatives should be pursued with the support of Education Counsellors, such as:

- expanding the Australian Government International Skills Training (IST) courses, designed for contextualisation in the delivery country, into other industry areas beyond teaching and learning;
- funding the development of targeted on-line learning tools and their delivery to showcase Australian capability for market entry purposes; and
- developing a micro-credential policy for offshore VET along with funding for developing pilots for delivery by endorsed providers so that learning – in-country or on-line – can be recognised formally within the Australian system but with adjusted accreditation and assurance requirements.

These targeted measures would demonstrate the value of quality and targeted vocational interventions to support Australian Government support and aid objectives in priority countries.

Establish more tools to promote global standing

In the context of increased global trade in education, it is crucial that Australia builds its reputation for high quality education and training. Australia's universities benefit from a suite of global rankings systems by which to signal their standing to the international market. Australia's vocational education providers do not benefit from such a system, although Australian TAFEs are regarded globally for their leading vocational education practices.

More effort could be made to benchmark Australia's vocational education credentials. Arguably, Australia suffers from a narrow view of VET qualifications that do not compare nor stand up to competitor nations - they are too focused on workforce tasks framed by Australian economic and industrial relations requirements¹⁷. There are measures like the OECD PIIAC¹⁸ but that is only every 10 years. The Australian Government should use its membership of multi-lateral organisations to drive for better measures for comparison of skills.

A useful ranking strategy is Worldskills which is a global competition of technical vocational skills¹⁹. Many emerging economies invest heavily in Worldskills, yet Australia does not. There is benefit, as a starting point, for Australia to signal its commitment to international education and the standing of our system by investing systemically in Worldskills Australia which facilitates preparation for global competitions.

Strengthen regulation oversight to back-up Australia's standing

The consultation paper rightly highlights that success for Australia is built on a reputation for quality. With VET representing close to a third of international student activity in Australia, resetting quality expectations cannot be overlooked within the strategy.

A refresh of the regulatory expectations of VET providers is the only way to rebuild the reputation of Australian VET for international purposes.

Government decisions indicate a sense of distrust of the sector. For example, the visa grant rate for VET applicants outside of Australia is significantly lower than that for higher education and applicants often face long waiting periods and unjustified rejections. The current prejudice against post-study work rights for VET graduates is another example pointing to questions about the utility of the qualification, despite public narrative placing vocational education equivalent in status to higher education.

The recurring behaviour of certain types of providers is an ongoing risk to Australia's reputation which should not be tolerated. However, the current regulatory model seems incapable of addressing these risks. The easy entry of new providers and capacity to by-pass genuine education and training (evident in the domestic VET where record levels of providers have been closed in recent years) create the platform for this behaviour.²⁰

To better protect the reputation of Australia's international education, entry and operational requirements need to be tightened. For example, only providers with a proven track record in vocational education should be entitled to register for international delivery. Policy consideration

¹⁷ Leesa Wheelahan, *Patching bits won't fix vocational education in Australia – a new model is needed*, International Journal of Training Research, Volume 14, 2016 – Issue 3 <https://www.tandfonline.com/doi/abs/10.1080/14480220.2016.1254368>

¹⁸ Programme for the International Assessment of Adult Competencies, see <https://www.oecd.org/skills/piaac/>

¹⁹ See <https://worldskills.org/>

²⁰ DESE is conducting a review of RTO Standards which shape the operation of VET in Australia. There has been no sign that international education is being considered.

should be given to proving educational bone fides such as internal education quality assurances similar to those in the higher education standards. Student support services should also form part of the expectations of providers and consideration should be given to measures which ensure students are blended in regular classes.

Claims that this may be anti-business need to be resisted. In the end, allowing (even facilitating) such behaviours is anti-industry and risks the success of all international education for Australia.

Uphold standards based on a holistic system, not add-on approaches

The quality and integrity challenges for international VET could be addressed through a more holistic approach to regulation and assurance for international education. At present, the regulatory approach is an add-on to the domestic regulatory philosophy and model. The dominant driver is domestic considerations and indiscretions to international students are too easily overlooked.

The preferred approach ought to be for self-accreditation and self-assurance for quality proven providers, with stringent monitoring on remaining providers. This would provide a direct signal to quality VET providers to innovate in areas and forms of professional technical learning. This does not obviate providers from their responsibilities to the visa and migration system but provides incentives for high quality and excellence and for balanced assessments by visa processing officers.

Target post-study work rights for priority skill areas

General post-study work rights appear to be directed to higher education graduates as an incentive to attract students in the first place. Clearly, work also gives students the opportunity to deepen their skills for a skilled migration outcome or for return to their country. This benefit is less afforded to the VET sector.

While the Australian Government is fully entitled to retain strong control over immigration flows, including deciding who comes into the country and the duration, more discretion within current settings would generate positive outcomes for the VET sector, support quality students outcomes and respond to current genuine skills shortages.

Labour and skill shortages are emerging in occupations which rely on VET preparation. Targeted visa conditions should be put in place to encourage students into these areas. As a targeted measure, post-study work rights should be opened to international students who study certain vocational qualifications, such as VET Diploma levels and above, over a minimum 2 year period in an area identified as beneficial to Australia's skills shortages such as ICT and engineering. The two year requirement would ensure that providers can ensure students acquire the skills expected of employers. To support quality outcomes it is recommended that visa conditions increase to 12 months before a student can transfer from their original provider without a release letter.

Provider risk rating (evidence level) and country risk rating would still be central to integrity but leeway in the Genuine Temporary Entrant requirements should be made to allow students to make the case they wish to get post-study work rights experience in Australia before returning to their home country.

The distinction between temporary post-study migration and permanent migration is important. Temporary migration, through post-study work rights and temporary skilled visas, is a way for international students to complement their education by applying their skills and building up valuable experience to take back to their home communities.

Overtime it would be expected that the National Skills Commission will be in a position to provide targeted advice about the need for flows of international students to meet skills gaps in the local labour market because local supply is not possible. This level of sophisticated data should also be leveraged to further open up for VET courses post-study work rights and some skilled migration options.

Fix the onshore student recruitment and transfer system

In the current international student recruitment model, many providers recruit the bulk of their international cohort fully onshore, with the support of some education agents. These providers free-ride off providers which invest heavily in offshore marketing and risk management of students to comply with Government expectations.

The onshore business model, involving providers as well as agents, needs full investigation, including analysis of the rates of transfer and changes in courses and qualification levels.

TDA also recommends that CRICOS registered providers be required to meet minimum benchmarks for offshore recruited students compared to onshore recruitment. To guarantee the education and cultural experience for international students, consideration should also be given to minimum requirements for a mix of international and domestic students.

Facilitate exchange opportunities for VET students

The New Colombo Plan, despite its success, entrenches opportunity to higher education students and subtly adds to perceptions that vocational education has little standing nor opportunities globally. Nothing could be further from the truth. High level technical proficiency is in high demand across the globe – the experienced practitioner with able hands and deep knowledge is a high commodity in many countries.

More importantly, the exchange of technologies of production and teaching and learning are direct benefits to Australia. The opportunity for Australians to engage offshore at the heart of innovation and product development and deployment brings new understanding and skills back to Australian firms and in itself can be a key source of innovation. Such programs are cost-effective in promoting Australia in the region and supporting transnational education.

The Australian Government changed the Endeavour Program to incentivise international students to settle in regional areas. While this remains important, a rebuild of international education should include a facilitation fund for student exchange.

Expand the Network of Education Counsellors

Australia has benefited from the presence of dedicated education counsellors in key countries across the globe. The new strategy should be supported with a revitalised and repurposed network.

In the context of global competition and trade counsellors can play a stronger role in advice to education sectors about competitor behaviour. This is not only concerning third countries operating in their region but the education and training developments in their host countries. These are strong signals which should be formalised as advice back to policy leaders domestically. There is a risk otherwise that Australian content and approaches are marooned compared to wider advances in other countries.

The panel should also be proactive to recommend expansion of the network into new market countries. Africa stands as an example.

Final Note

As a final note, TDA recommends the strategy includes a a review of progress every two years.

TDA thanks the Expert Panel for the opportunity to provide this response to the consultation paper and on behalf of all members is available to continue the dialogue about strengthening international education.

TDA acknowledges that this submission will be published by the Expert Panel.

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