COPHE Response to the

Draft National Strategy for International Education

May 2015

We welcome the publication of the draft National Strategy and the opportunity to comment on behalf of The Council of Private Higher Education Inc. (COPHE).

COPHE is a peak body representing higher education institutions that are independent of Australian public universities. The membership is diverse and includes private universities and institutions operating from more than 80 campus locations across Australia. Members vary in student enrolments from under a hundred to a few thousand and include not-for profit and for-profit operations. Courses offered range from pathway diplomas through to bachelor and master's degrees, often linked to professions and employment. Some members also offer research degrees, including PhDs.

The diversity is also evident in the provision of international education where for some institutions it is their main focus and others where it is a minor part of their activity. For COPHE, seeking policy that assists the latter and encourages all students to think as global citizens is a priority.

General comments

We welcome the support given by various levels of government to international and transnational (offshore) education, and the recognition of its contribution to the national and global economy and society. This is reflected in the Ministers' statements, and the draft Vision statement

Australian international education is a core element of Australia's economic prosperity, social advancement and international standing.

We caution against use of rhetoric such as *create an education system that stands out as the best in the world* and recommend modifying it to "one of the best" or similar, mainly because such an absolute statement is unverifiable and smacks of hubris.

We note the progress that is being made on a whole of government effort, including current reviews and consultations into the student visa framework, ESOS Act and National Code, and Austrade's marketing strategy. All of these need to form an integrated regulatory and support framework for the sector. We urge government to continue to co-ordinate across portfolios, and engage effectively with the sector. In particular, there is scope to improve the communication and effectiveness of regulators, especially TEQSA and ASQA and application of the Australian Qualifications Framework to support the sector, and underpin confidence in its quality and integrity.

While we are pleased the Government has accepted all the Chaney recommendations, however it is imperative these are implemented immediately, especially the formation of the Co-ordinating Council to provide a coherent direction to the sector that has not always been evident in the past.

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Various departments and levels of government have often been at odds, leading to mixed messages and policy inconsistency to the detriment to the sector. Examples include past frequent changes to skilled migration policy and its nexus with international education, and the recent sudden increases in visa application charges, especially the introduction of an additional $700 STAC charge for second and subsequent onshore applications for temporary visas making our visa charges higher than our competitors.

While demand for international education is projected to continue to grow, we face increased competition not only from traditional English speaking destinations such as the USA and UK, with their historical prestige advantage, but also from other European countries, and emerging Asian hubs, many of whom have likewise set ambitious growth targets. Opportunities and student expectations are also evolving; we should anticipate more two-way study abroad and exchange programs, transnational delivery, use of new communications technology, and targeted short courses and professional development programs, in addition to the traditional international student who completes a whole award onshore.

Comments on specific goals and strategic actions

Goal 1: Creating a world-class education system

Strategic action 1.1: Embracing the freedom to achieve excellence

We support the proposed actions to enhance autonomy, diversity, competition and student choice, consistent with COPHE principles; in particular, the higher education reform legislation which would deliver equity through the extension of CSPs to domestic students in all undergraduate programs regulated by TEQSA, including the effective sub-degree pathways. This will produce a more diverse and vibrant sector, to the benefit of Australia's international reputation and wider choice and enhanced experience for our domestic and international students. The inclusion of all higher education providers in international education policy and equality in the treatment of students should follow the same principles as the higher education reform agenda.

Strategic action 1.2: Investing in world-class research and research infrastructure

We support investment in research, including encouragement of industry and corporate partnerships. We urge that research funding should be transparent, and not cross-subsidised from student contributions which should be directed to teaching.

COPHE strongly believes that competitive research funding should be open to all institutions and individuals who can demonstrate research excellence or potential, not only public universities. A range of non-university higher education providers (NUHEPs) engage in fundamental research and PhD training, and deserve equitable opportunity for support to enhance national research output and international standing.

Strategic action 1.3: Supporting better information on quality performance

We support efforts to support continuous quality improvement though better data and surveys, and have welcomed QILT in particular. It holds great promise for measuring performance in higher education with improved and more comprehensive data on student outcomes.

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Strategic action 1.4: Provide quality assurance while reducing red tape

We support the current ESOS Review and steps to remove unnecessary reporting while retaining appropriate regulation and QA measures.

The establishment of the Tertiary Education Quality and Standards Agency (TEQSA) as the national higher education regulator was a significant step forward in building confidence in the quality of higher education and overall reduction in red tape. Nevertheless, TEQSA must be adequately resourced to maintain confidence in the integrity and quality of Australian higher education, given recent media reports of cheating and allegations of compromised standards.

Goal 2: Building on strong and emerging international partnerships

Strategic action 2.1: Strengthening and diversifying institutional partnerships

Strategic action 2.2: Investing in high-quality international research collaborations

Strategic action 2.3: Building confidence through government-to-government engagement

Strategic action 2.4: Broadening engagement to create new opportunities

We support all of these actions, including exploring opportunities in regions other than the Indo-Pacific, although the latter will remain our largest market for now. Again we urge government to include all providers that are not public universities in all relevant higher education policy consideration, alongside our research intensive universities.

There are many smaller providers delivering world standard courses in specialised niche fields, including performing and creative arts and specialised fields of management, that enrol domestic students, with little or no international focus. We suggest there is potential for much greater international engagement by such providers, which would benefit students and enhance Australia's reputation. COPHE would seek to work with government to raise awareness of this potential.

A barrier to the ability of some of our Members to engage with peer institutions offshore is the restrictive definition in Australia of the title *university,* which requires discovery research across at least 3 fields. COPHE continues to argue, in line with international practice for institutions delivering full degree programs informed by other categories of scholarship[1], but not delivering PhD level research to be able to be called a *university,* perhaps through a category such as *University College,* which is now irrelevant in its current Australian usage where it is restricted to a proto, research intensive university.

Goal 3: Fostering an international outlook

Strategic action 3.1: Preparing students for global engagement

Global engagement generates significant individual and social benefits. We encourage initiatives that promote two-way student and academic staff mobility and exchange, including the New Colombo

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[1] As defined in: Ernest L Boyer (1990) *Scholarship Reconsidered* Jossey-Bass, San Francisco

Plan, Endeavour awards and OS-HELP loans, but argue that such programs should be available to all students and staff, whether at public or private institutions. This is not the case at present.

Strategic action 3.2: Rejuvenating language study

We strongly support worthwhile efforts to increase language study, especially Asian languages, where Australia lags many countries. Many past efforts have been ineffective. The proposal to engage pre-school age children through interactive, games based learning is particularly interesting, and worth pursuing.

Goal 4: Attracting international talent

Strategic action 4.1: Attracting students from around the world

Strategic action 4.2: Marketing Australia as a high-quality education destination

Strategic action 4.3: Building lasting connections with alumni

We endorse all of these actions. Co-ordination between various government departments, different levels of government and industry stakeholders is critical, especially in the face of increasing and more sophisticated competition. In HE, marketing strategies need to diversify fields of study. At present (2014 data) 48% of international enrolments are in Management and Commerce, while only 32% are in STEM disciplines (engineering, IT, health, sciences); by comparison, the figures for the USA are 21% Business and Management, and 41% STEM.

Goal 5: Staying competitive

Strategic action 5.1: Maintaining competitive visas and strong consumer protection

Australia has led the way in regulation of international education and consumer protection through the ESOS Act 2000, and subsequent developments; we anticipate further improvements from the current reviews of student visas and ESOS framework.

The costs of student visas were suddenly increased in 2013, and are considerably higher than competitor countries, apart from the UK in some instances. This needs to be immediately redressed, not only because of the cost impact on students and sponsors, but also for the confused signal of welcome it sends, and the impact on bilateral relations, for example students sponsored by other governments or agencies.

Strategic action 5.2: Identifying work experience opportunities

Opportunities for work related learning and on the job experience need to be promoted, with appropriate safeguards to prevent worker exploitation. The introduction of post-study work (PSW) rights (485 visa) has been very attractive to many students, including those who intend to return home, or join a mobile global workforce with real world experience. Some also see PSW as a pathway to employer sponsorship for skilled migration, consistent with current government policy.

In spite of recent promotional efforts by the government, we believe the opportunities for employers to attract high quality recent international graduates as employees, initially temporary, are not well

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understood, or utilised. Many still seem reluctant to invest in training employees who are not permanent residents. More still needs to be done to promote the advantages of engaging international recent graduates, for the benefit of all. While there are some excellent individual projects, a co-ordinated approach is needed with industry bodies, business councils and the international business diaspora.

A backlash from disappointed graduates is possible if they are not able to access the meaningful post-study work experience that was promised, and guided their decision to study in Australia.

Strategic action 5.3: Improving English language proficiency

Students and providers need to implement strategies and programs to continue to develop English proficiency and communication skills throughout the course of study, not merely meet a minimum entry requirement. Perhaps this could continue as a TEQSA focus.

Strategic action 5.4: Improving access to public transport and health services

International students are required to have OSHC cover; it is important that they maintain their cover, e.g. if they extend their course.

Transport concessions are a significant touchstone and important signal of welcome for international students. It is unfortunate that the two largest states, NSW and Victoria grant only partial concessions; in the NSW case, it excludes the most common tickets.

Universal concessions would not only be logically consistent, but might also mitigate housing pressures and safety concerns where students travel at night for part-time work.

The Baird Review 2010 (Finding vi) stated *International students should have access to equitable travel concessions.*

Strategic action 5.5: Improving access to suitable and affordable accommodation

Australia is already seen as an expensive destination for tuition fees and living costs, even with the recent decline in exchange rates. The lack of suitable housing and the attendant political issues in the inner cities is likely to cap potential growth in onshore international students. Promotion of regions has some attraction, but many students opt for the major cities because of family and ethnic networks, and potential work opportunities.

Even at a time of fiscal austerity, Government needs to continue to seek ways to stimulate dedicated accommodation development from the private sector, and promote the advantages of homestay arrangements in the community to utilise surplus residential capacity, especially for newly arrived students.

At a minimum we need to provide accurate advice on accommodation options and normal procedures such as leases and bonds with which international students may not be familiar.

Strategic action 5.6: Increasing community engagement

We support all actions to encourage community engagement, and recognition of the economic and

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social contributions of international students. The request for more interaction with local students is a constant theme in international student surveys. International students in turn raise the language and cultural understanding of domestic students.

There is scope to better promote these advantages to counter some of the apathy and mis-information that exist in the wider community.

We consider Australians generally to be hospitable people who, given the opportunity, quickly recognize the contribution of other cultures. Identifying opportunities and mechanisms for people getting to know international students needs to be encouraged and given media attention, emphasizing the mutually positive aspects. Government can paint a valuable backdrop to encourage this activity.

Goal 6: Embracing opportunities to grow international education

Strategic action 6.1: Leading good practice in new modes of delivery, including online

The onward progress of new delivery modes will continue, and Australia needs to be a generator, not merely a consumer. Online will open new potential markets, in specific training, professional development and postgraduate education. Some will still value classroom and campus social interaction, but new technologies can enhance this experience, in both onshore and offshore (transnational) delivery.

Strategic action 6.2: Enhancing opportunities to provide education services overseas

We expect onshore international education to continue to show sustainable growth within the constraints of institutional capacity, physical infrastructure and social acceptance. Greater potential growth is in transnational delivery, often through in-country partners, and with programs matched to local needs.

The business models and potential pitfalls are somewhat different to the traditional onshore delivery model. There is a role for government to:
- Provide advice and support, including better sector data analysis and benchmarking for new entrants
- Promote better regional understanding and recognition of qualifications and non-award training programs
- Identify regulatory constraints, including in destination countries (course approval processes, ownership restrictions, repatriation of monies etc) which may be discussed at a bilateral government level.

Strategic action 6.3: Understanding the opportunities

We agree that government can further assist the industry through improved comprehensive data and surveys, and ongoing competitor analysis. While we recognise and appreciate the existing systems, there are still some gaps, and competition continues to intensify.

Stakeholder Questions

We appreciate the opportunity to respond from a non-public university perspective to the specific questions in the draft strategy.

Does the vision statement in the draft strategy represent Australia's aspirations for international education?

The vision statement captures the advantages to Australia – economic, social and reputational. We should refer also to the advancement of individual and global well-being, as well as our national interests.

Are any significant goals for international education not adequately covered?

We need to see the related Austrade long term market development plan, *Australian International Education (AIE) 2025,* which is currently being developed, with stakeholder consultation. If the National Strategy articulates the *what* and *why* of international education, we expect the AIE to flesh out specific targets and strategies, the *how.*

For instance, the draft Strategy does not refer to the role and quality assurance of education recruitment agents, on which much of Australian international education depends, sometimes contentiously.

Can you identify the strategic actions which best support your goals for international education?

COPHE members constitute a broad spectrum, with a varying extent of size, course specialisation, research activity and international engagement. Hence different institutions will see relevance in different strategic actions. We face a particular challenge, particularly in smaller institutions, in establishing the capacity and level of expertise required to engage with international education. It is a matter of scale.

Looking at international education as a whole, we suggest important actions include:
* Proper funding support for international education, including national branding and promotion, infrastructure provision (housing, transport etc) and research funding, to maintain or raise the international ranking of leading higher education institutions, with reputational knock-on effect to all sectors
* Engagement of the whole community to recognize the contributions of international students locally, nationally and globally, and specifically employers to promote work integrated learning and post study work opportunities for graduates
* Promotion of language development to enhance our international outlook and reputation, and prepare our future skilled workforce
* Support for transnational delivery of Australian education and training, incorporating new technologies as appropriate. This represents a major opportunity to enhance Australia's global profile and reputation, not only in the traditional Indo-Pacific markets, but also beyond.

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What are the best measures of success?

Much of the public debate has focussed on the trade and income aspect of international education ($16B export industry etc.). While this remains important, we are now developing a more nuanced appreciation of the benefits of international education, such as global perspectives and cultural engagement of our students and wider community, and development of international partnerships and co-operation.

As well as data such as income and student enrolments, student satisfaction indices, especially when benchmarked against competitors, and the quality of their total experience – educational, social, living – will become more prominent in a competitive global environment.

What are the case studies that best illustrate Australia's success? Please provide examples.

Some notable successes have been:
1. The continued improvement in the regulatory framework and consumer protection, from ESOS 2000 to the present suite of reviews
2. The increase in outbound mobility and international engagement of domestic students, supported by programs such as the New Colombo Plan and Endeavour awards
3. The scale of onshore international education, growth over the previous decades and present recovery, to a position where Australia now welcomes more international tertiary students for its size than any other major destination; in absolute numbers, it lags only the USA and UK, and is about on a par with Germany and France – all countries with much larger populations and number of tertiary education institutions
4. Developing transnational programs and linkages to project Australian education and expertise overseas, including public universities with significant offshore operations, institutions that are part of global conglomerates, and skills training providers. There is significant potential to expand TNE delivery.

We consider it likely that everyone reading this will know former international students who are now making outstanding contributions to society whether in their home country, Australia or elsewhere. In a sense, each of these people is a live case study that demonstrates the effectiveness of our immigration and international education activities.

What would you like to see progressed as a priority in the first year?

The first year priority is to complete current reviews (student visas, ESOS etc), the National Strategy, related Austrade AIE market development plan, Ministerial Roundtables and the (Chaney) Co-ordinating Council, to provide an integrated structure to support the industry at is moves forward. It is critical that all these components fit together, and not exist in separate silos.

Conclusion:

We need a single co-ordinated national approach, properly resourced and supported by sound and consistent public policy, that provides a degree of certainty going forward in a complex and rapidly changing competitive global context.

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Please contact us if you wish to discuss any of these or other points.

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APPENDIX: International Participation in Higher Education

In Australia there are currently:

- 37 Table A universities, often referred to as government or "public"
- 3 table B "private" universities, and one university of specialisation
- 2 Table C overseas universities
- 130 Non University Higher Education Providers (NUHEPs), of which 5 have self-accrediting authority.[2]

All are subject to the national regulator, the Tertiary Education Quality and Standards Agency (TEQSA).

Institutions offering courses to international students on a student visa in Australia must be listed on the Commonwealth Register of Institutions and Courses for International Students (CRICOS). In addition to the 43 universities, there are NUHEPs listed to provide bachelor programs (69) masters by coursework (40) masters by research (6) and doctoral degrees (7). Some NUHEPs offer only sub-degree HE awards (diploma, advanced diploma, associate degree). Others, including a couple teaching to doctoral level enrol only domestic students, and so are not CRICOS registered.

Table 1: Higher education domestic and international enrolments 2013

Students	All providers	Table A universities	Table B universities	NUHEPs and Table C	% NUHEPs and Table B/C
Total	1,313,776	1,215,493	18,448	79,835	7.5%
Domestic	985,374	918,854	15,771	50,749	6.8%
International onshore	243,617	213,974	2,324	27,319	12.2%
International offshore	84,785	82,665	353	1,767	2.5%

About 20% of onshore HE students are international. Amongst Table B/C and NUHEPs, approximately 35% of onshore students are international. The ratio of international onshore students varies considerably between provides; some have none or few, whereas others cater almost exclusively to international students.

Note that this data set from the Commonwealth Department of Education and Training underestimates the number of domestic students at non-government providers, as those not in receipt of HELP loans are not reported.

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[2] TEQSA Register, April 2015

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Table 2: International HE enrolments onshore by level of study for all and non-government providers 2014 (Austrade PRISMS data)

Level of study	All providers	Non-government	% Non-government
Adv. Dip (HE)	919	839	91.3%
Assoc Deg	1,367	462	33.8%
Bachelor	116,001	13,064	11.3%
Diploma (HE)	21,376	17,468	81.7%
Doctorate	17,106	65	0.4%
Graduate Certificate	1,321	115	8.7%
Graduate Diploma	2,912	722	24.8%
Masters Coursework	87,653	7,096	8.1%
Masters Research	1,335	24	1.8%
Total	249,990	39,855	15.9%

There are also many large non- government providers that specialise in sub-degree pathways – diploma, advanced diploma and associate degree awards - with almost 80% of international enrolments in these courses.

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