



ISA SUBMISSION: AUSTRALIAN STRATEGY FOR INTERNATIONAL EDUCATION 2021-2030

INTRODUCTION

Independent Schools Australia (ISA) is the national peak body representing the Independent school sector. It comprises the eight state and territory Associations of Independent Schools (AISs). Through these Associations, ISA represents 1,169 schools and over 647,000 students, accounting for approximately 16 per cent of Australian school enrolments. ISA's major role is to bring the unique needs of Independent schools to the attention of the Australian Government and to represent the sector on national issues.

ISA also represents the National Catholic Education Commission (NCEC) on matters relating to International Education. This submission is a joint submission on behalf of the non-government school sector.

DISCUSSION QUESTIONS

1. What are the key priorities for a new Australian Strategy for international education?

SHORT TERM PRIORITY - RECOVERY FROM COVID-19

Any "new" Australian Strategy for international education will first need to address the fallout of the COVID-19 pandemic and repair any damage to Australia's international reputation caused by the impact of the government's pandemic response on international students who were enrolled before borders were closed.

There is significant ongoing concern in the non-government school sector about when school-level international students will be able to come to Australia to resume or commence their studies. Although this concern is obviously not limited to the school sector, the impact of disrupted study plans on younger students at a critical age and stage of their education has been particularly devastating.

Many providers of international education, not just non-government schools, are currently supporting students overseas to continue their studies through online learning. However, this is not the most desirable way forward for these students, particularly for those school students who are at an extremely vulnerable stage of their educational journey. The school sector is somewhat different to other sectors in that it is working with children and young people who can be challenged by online learning when their peers are in class and they are not able to participate in those relationships.

Education providers have also been supporting the international students who are onshore during the pandemic and the border closures. This has been a resource-intensive exercise for the school sector where most students are under 18 years of age. The students who are onshore have not been able to return home for holidays in case they are unable to re-enter Australia. Schools have been making significant efforts to keep boarding facilities open, to support homestay families and to provide holiday programs for these students. But not seeing their families continues to take a toll on students' mental health and wellbeing. It is highly likely that the after-effects of the pandemic will linger for many years to come and support for the mental health of students will need to be ongoing.

Further delays in student returns pose a threat to the on-going viability of schools' international programs. A clear timeline and processes for bringing international students to Australia in a COVID safe way to continue their studies face to face is necessary and should be supported by all levels of government in Australia.

LONGER TERM PRIORITY - REDEFINING AUSTRALIAN INTERNATIONAL EDUCATION

The COVID-19 pandemic has had a huge impact on the international education sector in Australia and providers have had to adapt and innovate to maintain and attract enrolments, with a reduced onshore cohort as well as offshore.

The new Australian Strategy for international education offers an opportunity for the international education sector to reflect on the upheaval of the last 18 months, what we have learnt in the process, and to consider where to next for Australian international education. Feedback from schools has emphasised the following elements as critical to this process:

- A clear brand for Australian International Education that defines who and what we are.
 - What do we all stand for?
 - Why do we do it?
 - What are our promises and non-negotiables?
 - Why an "Australian education"?
- Equity / focus on all sectors of education, and
- Ensuring that the legislative environment (the ESOS Framework, etc.,) is flexible enough to promote innovation and agility, while maintaining quality and brand integrity.

2. Students should be at the centre of the new Strategy. How can Australian education providers deliver the best possible student experience both now and in the future?

It is clear that Australia's international education reputation has been damaged by COVID-19. Onshore international students, as temporary entrants, were not able to access any of the substantial forms of Commonwealth assistance provided to Australian citizens. As communities went into lockdown and part-time hospitality and other jobs disappeared, helping students financially was generally left to providers and state and local governments. The Australian Government view articulated and widely reported at the time was that students should return home.¹

Halfway through 2021 there continues to be no real indication for international students when borders might reopen to allow them to resume or commence their studies and it is now clear that many students are now looking at other options, including studying in Australia's traditional competitor countries such as the UK and Canada. Ensuring that international students feel welcome and able to come and study in Australia is central to ensuring a positive student experience now and in the future.

One school commented that: "an Australian experience is about creating a sense of inclusivity to ensure students are made to feel welcome, supported, encouraged" and we need to ensure that this is a view shared by international students and their families.

In order to deliver the best possible student experience, it is imperative that providers ensure their offerings are student-centric in all areas of operation and execution. To do that, the sector and stakeholders will need to define and illustrate what the best possible student experience looks like for

¹ <https://www.abc.net.au/news/2020-04-03/coronavirus-pm-tells-international-students-time-to-go-to-home/12119568>

different cohorts of students and their families, e.g., for different cultures, learners, ages, sectors and so on.

Once the sector develops an understanding of the students' expectations of student experience, then the sector and individual providers can work towards meeting or exceeding those expectations.

As the school sector enrolls mostly students under the age of 18, it has a duty of care which differs to that of other sectors. Under the current ESOS and visa arrangements, schools take on and are legally responsible for the accommodation and welfare for a large proportion of their international students. Schools provide their students with wraparound supports which aim to ensure that they become a part of the school community in all aspects of their academic, social, cultural and physical development.

Further, given the school sector's role as a pathway to further study, the provision of a quality education to students to set them up for choice and opportunity going forward is paramount.

Non-government schools have noted that the following elements are/will be key in delivering the best possible student experience at the school level:

- Ensuring all students are safe and receiving the highest quality education and welfare support whilst in Australia.
- Ensuring that students are studying courses/subjects to assist them with university placement in the future.
- Having clear transferable options for the ATAR to meet overseas university entrance requirements.
- Ensuring that students are proficient in speaking, reading and comprehension of the English language to improve their confidence and social skills as well as to achieve success academically.
- Ensuring there is international recognition and awareness of the Australian senior secondary certificates and the Australian Tertiary Admissions Rank (ATAR).
- Continuing work on expanding a national approach to school education that is easily understood off-shore.

3. What changes are needed to make Australia more globally competitive over the next decade?

- i. Policy and regulatory flexibility are important in enabling providers to innovate. How can we utilise these settings to pursue opportunities, and in what other ways can we work together to ensure Australia remains globally competitive?

FLEXIBILITY REGULATORY FRAMEWORK

The imperatives of educating students during the pandemic have shown that Australian education providers are flexible and agile enough to diversify their offerings to students unable to enter the country for study, supported by government with accommodations made by regulatory authorities and government agencies to enable and facilitate this shift in provision.

While it seems clear that the demand for onshore study will remain, education providers now have significantly more expertise and experience in delivering learning online to students than they did pre-pandemic. As we move towards a post-pandemic world, it is vital that regulatory frameworks continue to be flexible to enable ongoing innovation in the delivery of education across a range of modes of study.

Learnings from the pandemic should be taken into account, for example, regulatory flexibility and measures that are required when major and unforeseeable changes or disruptions to students' circumstances occur. The guiding principle for allowing regulatory flexibility into the future, particularly for students under 18 years of age in the school system should be "in the student's best interests".

VISA SYSTEM

Speed and ease of the visa process has been noted by schools as another key element in making Australia more globally competitive over the next decade. Given the highly competitive market that Australian education providers will be faced with post-pandemic, it is also worth noting the relative cost of Australian student visas compared with those of our competitor countries. The value of public statements by the government welcoming international students and encouraging their visa applications cannot be understated also.

Australia's visa system also needs to be responsive to the needs of students and to accommodate a range of offerings as onshore providers adapt to changing markets and respond to the options that students want. This might include facilitating ease of transition from online to face to face studies (and vice versa), or from tourist or exchange visas to student visas.

As for flexibility within the ESOS regulatory framework, learnings from the pandemic should be considered in the visa system. For example, future enhancements to student visas might include greater flexibility around visa grant duration (and the requirement for visa length OSHC) and enabling extensions (from onshore or offshore) to visas already granted, rather than requiring a new visa application if a student intends to continue studying in the same sector.

PARTNERSHIPS AND PATHWAYS

Whilst safety has been a significant priority through the pandemic, as other parts of the world move out of COVID and Australia's borders remain closed, access to education is being a key determining factor for students. In order to compete, Australia must offer better, transparent pathways and future opportunities. Increased and diverse partnerships and pathways have the potential to improve the competitiveness and support the recovery of Australia's international education sector.

Schools have noted the following as potential partnerships and pathways to improve outcomes for providers and students:

- Ensuring that the benefits of an Australian school education are recognised in seeking entry to further study or as counting towards permanent migration.
- Creating and enabling pathways and partnerships with other education sectors to create the enduring pathways; potentially from primary school all the way through to tertiary studies, from tertiary study to the work force and future permanent residency opportunities.
- Recognising the contributions international education makes to other sectors and joint partnerships (e.g., tourism, housing, employment, etc).

BRAND AUSTRALIA

The need for a unified national approach to branding for education services, such as that used by Canada, has been noted by schools to improve Australia's competitiveness going forward. The current work of Austrade in developing the Australia national brand is an opportunity to move towards a cohesive approach to promote all Australian education providers - public and private - under one brand "umbrella" to a broad range of countries.

In the context of qualifications, the NSW Education Standards Authority and Nous Group Report, *International opportunities for Australian school curriculum, assessment and regulatory products*, noted the following:

Market experts have highlighted that international customers have raised that the differences between states and territories in the educational products they provide is limited. Simply put, no state or territory has as strong a brand reputation as Australia does. There may be potential for agencies to coordinate on a 'brand Australia' for school products to provide mutual benefits to all jurisdictions. This Australian brand could be reflected in communication and marketing materials,

as well as products. For example, a range of market experts raised that Australian jurisdictions would benefit from a ‘brand Australia’ senior secondary school certificate.²

4. How can providers, governments and stakeholders work together to achieve diversification opportunities (for example of disciplines, source countries, study destinations and delivery models)?

DIVERSIFICATION OF SOURCE COUNTRIES

It has been clear for some years that the Australian international education sector is heavily reliant on the Chinese and Indian markets. In 2020, Chinese students made up nearly 60% of the non-government school sector international student enrolments. While in the school sector this risk is offset somewhat by the relatively low number of enrolments compared to other sectors, it is still an area of concern, particularly as the relationship between Australia and China fluctuates.

In developing future strategies for international engagement, it is important to take account of sectoral differences in key source countries for educational offerings. For example, India, while an important country for higher education and VET providers, does not present many opportunities for diversification or delivery for the school sector.

Diversification in the school sector can be supported through the following activities:

- Launching the national Australia brand in new source and partner countries without the need for initial education provider investment.
- Continuing the opportunities for virtual recruitment and collaboration with key partners such as Austrade.
- Increasing government and provider linkages in new markets as a market development strategy.
- Assisting small providers, such as non-government schools, to apply for EMDG grants to assist in developing new education offerings or become established in new markets.

OPPORTUNITIES FOR REGIONAL GROWTH

The national international education strategy should provide a valuable opportunity to explore the issues around attracting more international students to regional centres, and further, to a range of education providers.

Regional diversification of the destinations of international students could go some way to addressing concerns around concentration of cohorts of particular students in capital cities. It is clear that many regional areas would like to engage in international education across a range of educational levels, but they need significant assistance to make this possible.

Regulatory initiatives such as a “7-year student visa” or “7-year+” visa, with more flexible visa options for accompanying guardians for under 18s in regional areas might also be considered.

OFFSHORE PROVISION IN THE SCHOOL SECTOR

An important area of potential growth for the non-government school sector is that of offshore provision or transnational education (TNE). Increasing offshore provision of education is often proposed as a way forward for the future of international education, but it is not currently a major area of activity in the non-government school sector. There are some significant hurdles facing individual

² https://internationaleducation.gov.au/international-network/australia/InternationalStrategy/EGIPProjects/Documents/Final%20report_International%20opportunities%20for%20Australian%20schooling_Nous_2019.pdf, p37.

non-government schools that need to be addressed so that the non-government sector would be able to participate fully in TNE.

The first issue is the significant amount of support required for non-government schools to get involved in offshore programs as they do not have the extensive systemic supports available to the government school sector, or the size and resources of the university sector. The required supports would include financial support, market analysis and identification of contacts, promotion, and effecting communication and overcoming barriers.

The second key issue relates to the significant considerations around the licensing of curriculum, which is owned by the relevant state and territory authorities. There is often an assumption that non-government schools can go into a market and set up the delivery of curriculum easily. However, this is not the reality. Our schools, while licensed to use the relevant state or territory curriculum in Australia, may not be able to merely extend that provision offshore. For example, Queensland non-government schools are currently not able to offer the Queensland state curriculum offshore. Curriculum licensing is only available to overseas educational institutions applying to become a “Queensland Recognised School” via Education Queensland international (EQI).³

While there is scope for the increased delivery of programs offshore and online, including distance education and blended learning, the sector would need assistance with accessing accreditation and certification services for any offshore delivery that deviates from standard provision or onshore delivery due to the ownership issues relating to curriculum and assessment.

OFFSHORE ENGAGEMENT

It is important to note also that offshore engagement in the school sector can also include other areas such as curriculum development, the provision of professional learning and teacher standards/supporting teacher accreditation in other countries. It is important that opportunities to engage in these activities are open to all sectors of schooling.

5. What are the necessary skills for the future that students should be prepared for?

- i. How can Australia improve employability outcomes for international students, ensuring they have the necessary skills to compete in a globally competitive labour market?

In a world that is ever-changing and increasingly interconnected, the necessary skills that students require for future success and to meet the needs of employers, and society more broadly, are also changing. The Alice Springs (Mparntwe) Education Declaration sets out the goals for Australian school education noting that the Australian education system “*must also prepare young people to thrive in a time of rapid social and technological change, and complex environmental, social and economic challenges...They need to deal with information abundance and navigate questions of trust and authenticity. They need flexibility, resilience, creativity, and the ability and drive to keep on learning throughout their lives.*”⁴

In the Australian school context, the key skills for the future are set out in the Australian Curriculum and have a high degree of convergence with the concepts around global education.

³ See: <https://eqi.com.au/study-options/offshore/curriculum-licensing> for details.

The Queensland Curriculum & Assessment Authority (QCAA) 2019-20 Annual Report records income from and liaison with offshore schools as being under the MOU with Education Queensland International (EQI): https://www.qcaa.qld.edu.au/downloads/publications/qcaa_annual_report_1920.pdf (pp 21, 35 & 62)

⁴ [http://www.educationcouncil.edu.au/site/DefaultSite/filesystem/documents/Reports%20and%20publications/Alice%20Springs%20\(Mparntwe\)%20Education%20Declaration.pdf](http://www.educationcouncil.edu.au/site/DefaultSite/filesystem/documents/Reports%20and%20publications/Alice%20Springs%20(Mparntwe)%20Education%20Declaration.pdf)

The skills developed in global education are similar to the general capabilities of the [Australian Curriculum](#), equipping students to be lifelong learners able to operate with confidence in a complex, information-rich, globalised world. The general capabilities particularly relevant to global education because they focus on ways of thinking, acting, behaving or learning to live with others are:

- Critical and creative thinking
- Ethical behaviour
- Personal and social competence
- Intercultural understanding.⁵

The imperative of international engagement at the school level is further evidenced by the fact that, in addition to the relevant elements of the Australian Curriculum, one of the objectives that has been set for the development of the PISA 2018 Student Assessment 21st Century frameworks for the OECD is to “develop a framework for the measurement of global competence which will assess students’ awareness of the interconnected global world we live and work in and their ability to deal effectively with the resulting demands.”⁶.

Clearly there is a need for schools, and indeed all providers of education, to meet the challenges of educating students in a global setting and to equip them with the skills needed for thriving in the new global environment. Non-government schools are meeting the challenges of increased ‘internationalisation’ in the following areas:

- Recognition of the importance of the internationalisation of the curriculum.
- Increased uptake in learning of foreign languages.
- Increased opportunities for Australian school students to study offshore.
- Increased professional development and opportunities for teachers to develop skills in teaching an internationalised curriculum.

However, the pandemic has undeniably had an impact on Australian schools’ internationalisation efforts and schools should be supported to strongly re-engage in this area.

And while the school sector does not generally focus implicitly on international students’ employability skills, schools have noted that they are focused on ensuring that the students who leave Australian schools are well adjusted to the Australian lifestyle, have good English skills and are prepared for further study in institutions both in Australia and offshore.

6. How do we create a uniquely Australian education experience?

- i. What is our value proposition for both international and domestic students?
- ii. How do we offer an Australian education experience while complementing the value of Australian offshore and online education?

⁵ <https://www.globaleducation.edu.au/teaching-and-learning/australian-curriculum.html>

⁶ <https://www.pearson.com/news/announcements/2014/december/pearson-to-develop-pisa-2018-student-assessment-21st-century-fra.html>

An education experience in Australian schools is characterised by diversity - in geographical location, linguistic, ethnic and cultural background of students, educational philosophies and religious beliefs.⁷

Understanding and valuing the benefits of this diversity, coupled with student knowledge, skills and agency developed through studies of the [Australian Curriculum](#) to prepare them to thrive in a rapidly changing and increasingly challenging and globally connected world, is the value proposition/opportunity Australian schools offer ALL students.

For school students under 18 years, an onshore schooling experience is enhanced by jurisdictional child safety and regulatory framework requirements for student welfare, accommodation and care during and outside of school hours.

For school students studying offshore during the pandemic, many schools have demonstrated their capacity to deliver continuing and meaningful online studies in ELICOS or mainstream studies, in some cases utilising school portals and/or live streaming of classes to deliver the same content and assessment as to students on campus, complemented by access to tutorial support.

This rapid shift to online delivery of school sector studies provides opportunities for individual schools with the capacities and connections to enhance the range of their educational offerings to overseas students, provided regulatory frameworks support this mode of delivery.

However, given the nature of schooling, there are significant benefits to face to face (i.e., onshore) schooling where possible. With the ongoing need for continued provision of online learning to students offshore, schools have identified a range of issues that they have to manage to ensure that students are experiencing a quality 'Australian' education experience.

- Difference in time zones can have significant impact on sleep and health of international students.
- From a teaching perspective it is extremely challenging to teach a class face to face and have some students online.
- Providing school classes just for offshore students requires additional teachers.
- Where students are studying online or offshore, it is critical to expose these students to the Australian lifestyle e.g., friendship groups/chats, some joint classes, mentoring, wellbeing support; involve family involvement; the provision of virtual extracurricular activities or experiences etc.

Rather than focus on a "uniquely Australian education experience", Australian schools, in providing a holistic education, recognise that each child is unique, and that each child's journey as a learner and as a person is unique. Thus, quality of educational opportunity and student experience is at the core of an Australian school education experience.

7. Community support for the international education sector is important for the sector's social licence. How can the benefits this sector provides to Australia be better understood by the wider community?

The importance of a community campaign, such as IEAA's *Broaden our Horizons*⁸, cannot be understated. It is vital that a community engagement strategy be one of the building blocks of any long-term international education strategy. Any attempt to significantly grow the number of international students onshore must be undertaken in conjunction with a community campaign to

⁷See, for example, the 2020 Snapshot of Independent Schooling in Australia, NSW Public Schools Culture and Diversity webpage or the 2016 Census Data Summary of Cultural Diversity in Australia.

⁸ <https://broadenourhorizons.com.au/>

ensure that the Australian public is 'onside' and that we are in fact, living up to the promise of being welcoming and inclusive. Capacity is not only measured in available places, but also in a community's willingness to absorb and welcome new members.

Such a campaign, which engages with the wider community, could highlight case studies of the positive social contribution of international students to Australian society. One example of this is the NSW international student awards which "recognise the outstanding contributions international students make to communities in NSW and celebrate excellence in international student community engagement."⁹ These awards recognise some truly exceptional international students across all sectors of education and showcase their contribution to Australian society.

Other possible activities / areas of focus include the following:

- Ongoing media commentary on the value of international students including both the broader economic benefit of international students as well as the role they play in the Australian economy, such as in the tourism and hospitality sectors.
- The economic value of accompanying family members / guardians for younger students as well as the economic benefits of visiting family members for international students more broadly.
- Highlight the number of Australia jobs in the education sector that depend on international education.
- Highlighting the impact of the academic work of international students e.g., higher education research students including PhD and post-doctoral students.
- Leveraging off other agencies and/or industries to promote the need for and benefits of international students/education e.g., the Business Council of Australia; ACCL, Hospitality industry etc.

As noted below, non-government schools comprise 30-40% of the CRICOS registered providers in Australia and they enrol comparatively small numbers of international students compared to other sectors. These schools, located as they are throughout capital cities as well as regional areas, already function as close, supportive "communities". They are exceptionally well positioned to support international education engagement strategies within their wider communities and regions. They will generally have capacity to enrol a greater number of international students. Boarding schools may have additional capacity to accommodate overseas students for short or longer periods of time.

The challenge for these schools to continue operating international education programs is the heavy regulatory and administrative burden they must take on to maintain their CRICOS registration in order to be able to enrol small numbers of overseas students.

Easing the regulatory burden of individual non-government schools, particularly those enrolling very small numbers of overseas students, and those in regional areas, will assist these schools to continue to participate in international education programs.

8. What else should the Council for International Education and the Australian Government consider in developing the new Strategy?

⁹ <https://www.study.sydney/programs/nsw-international-student-awards#:~:text=The%20NSW%20International%20Student%20Community%20Engagement%20Awards%20recognise%20the%20contribution,is%20offered%20across%20two%20categories.>

In 2020 the school sector in Australia enrolled 3.2% of all international students and the non-government schools enrolled just over 39.5% of those students – just under 9,500 students.¹⁰ ISA estimates that between 30-40% of all CRICOS registered providers in Australia are Independent schools that are individually registered and individually responsible for meeting compliance requirements. Catholic systemic schools enrol a further 10% of international students. Some schools also have ELICOS centres attached to their institutions which may also be separately registered on the CRICOS.

By contrast, state departments of education (enrolling approximately 60% of international school students overall) hold single provider registrations covering any number of state schools enrolling international students within a state or territory.

International student enrolments in non-government schools vary from 1 to close to 200. The median number of international students at an Independent school is 9 students. This profile differs quite substantially from other sectors. For most non-government schools, international students do not determine the school's sustainability. Rather, international students provide a much-valued international element and diversity to school populations.

Our schools choose to engage in this arena for a variety of reasons, but always for the cultural and educational benefits to the school community and its members. School level enrolments of international students provide an important element of internationalisation and are a significant part of the cultural landscape of many schools. As has been noted above, they are also a valuable pipeline for higher education institutions providing tertiary applicants who already have years' experience in the Australian education system and in living in Australia.

But student enrolments are not the only way that non-government schools engage in international education. Non-government schools want to and are engaging more broadly in international education in a range of activities beyond enrolling students on student visas. These include:

- Sister school relationships involving language and cultural exchange.
- Student exchange programs.
- Teacher exchange programs.
- Study tours (inbound and outbound).
- Teaching of foreign languages.
- Use of international curriculum e.g., International Baccalaureate.
- Involvement in international school organisations and programs e.g., Round Square, Duke of Edinburgh's Award.
- Participation in international conferences for professional development.
- Sponsorship of students and fund raising for international causes.

The iGraduate *Filling the Data Gap: International Engagement in the School Sector* National Report (March 2020) was the first national, cross sector attempt to quantify the range of activities undertaken in both CRICOS and non-CRICOS registered schools. The results of the survey illustrate the breadth of schools' engagement in international education beyond student enrolments.

Nationally, according to the survey, the majority of inbound experiences in 2018 were undertaken by visitor visa holders - 9,792 experiences or 60% of all experiences. This is

¹⁰ 2020 PRISMS data.

significant as the *Filling the Data Gap* project is the first national study in Australia to quantify the proportion of inbound student visitor visa holders studying in Australian high schools.¹¹

The non-government school sector needs systematised support to ensure that opportunities to internationalise education are consistent and ongoing across all schools.

Given the nature of non-government school sector participation in international education, it is important that non-government schools are supported to participate in international education in a range of ways and in the ways that suit them best. Approaches that work for other sectors of education are not necessarily going to work for the school sector and the sector needs specific approaches for internationalisation, “not bolted on to existing operations to widen markets” as was noted by one school. Such support would also assist to create a ‘level playing field’ across the school sector and stimulate growth in a range of areas of international engagement.

¹¹ <https://internationaleducation.gov.au/international-network/australia/InternationalStrategy/EGIPProjects/Documents/Attachment%20L%20-%20Tribal%20GP-igraduate%20National%20report.pdf>