

INQUIRY INTO AUSTRALIA'S TOURISM AND INTERNATIONAL EDUCATION SECTORS SUBMISSION

DATE 15 DECEMBER 2022

1. ABOUT THIS SUBMISSION

ISA has prepared this submission in response to the Joint Standing Committee on Foreign Affairs, Defence and Trade's Inquiry into Australia's tourism and international education sectors.

This submission provides an overview of the impact of COVID-19 and the subsequent closure of Australia's borders on international education in non-government schools and the potential contribution of the sector to Australia's economic recovery.

ISA consulted with the state and territory Associations of Independent Schools (AISs) and the National Catholic Education Commission in preparing this submission on behalf of the non-government school sector.

2. KEY POINTS

Independent Schools Australia has considered the inquiry terms of reference and raises the following issues:

- COVID-19 has had a huge impact on all aspects of schooling, including the non-government school sector's international education activity, and the toll on student health and wellbeing has been significant. The pandemic has had an impact on students, staff, and the provision of international programs.
- Online innovations are guided by the school sector's preference for face-to-face learning. Schools embed language acquisition and Australian cultural experience in the school curriculum and the physical attendance of students.
- 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.
- Improving the speed and ease of the visa system has been noted by the sector as key in making Australia more globally competitive.
- There is an opportunity for improved pathways including collaboration with higher education providers, and employability skills development.
- Australia's brand should be the focus of ongoing marketing to promote Australia as a destination of choice for international students.

- International education can support and enhance Australia's reputation and relationships internationally.

3. ABOUT ISA AND NCEC

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 1,187 schools and over 667,000 students, accounting for approximately 16 per cent of Australian school enrolments.

ISA's major role is to bring the unique needs and contributions of Independent schools to the attention of the Australian Government and to represent the sector on national issues.

ISA represents the non-government school sector on matters relating to International Education. This submission is a joint submission together with the National Catholic Education Commission (NCEC). The NCEC is the representative body of Australia's Catholic schools. Australia's 1,755 Catholic schools educate 777,000 students.

4. INTERNATIONAL EDUCATION IN NON-GOVERNMENT SCHOOLS

The latest data shows that just over 11,000 international students are enrolled in Australian schools.¹ These students comprise nearly 1.7% of the total international student cohort down from 4% in 2019. This is a significant decrease in enrolments. Since 2019 international student enrolments in the school sector have more than halved and year to date enrolments in 2022 are currently down 14% on 2021.

Of the school sector total, nearly 40% or 4,000 of these students are enrolled in non-government schools. Generally international student enrolments comprise a small percentage of their overall student cohort, and many non-government schools enrol international students for the purposes of internationalisation of schooling and enhancing student cultural diversity rather than for financial reasons.

The sector is very aware that this profile differs quite substantially from other sectors. For most of 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.

Study tours, where students come to Australia on tourist visas, were widespread in the school sector but COVID-19 and the border closures have also had a significant impact on this activity.

¹ August 2022 Year-To-Date (YTD) PRISMS data.

5. CHALLENGES AND EFFECTIVE MEASURES

Challenges associated with the loss of international student numbers as a result of the significant disruption caused by the COVID-19 pandemic and effective measures to attract and retain students to Australia

CHALLENGES

The COVID-19 pandemic has had a significant impact on the international education sector in Australia and providers have had to adapt and innovate to maintain enrolments, with a reduced onshore cohort and the need to provide online learning to students offshore who could not come onshore due to border closures.

During the pandemic, schools made significant efforts to ensure that enrolled students, onshore and offshore, continued to receive quality education and care. Schools provided significant support to international students who were onshore and remained onshore during the pandemic. This was a resource-intensive exercise for the school sector where most students are under 18 years of age. Generally, these were students who were onshore were not able to return home for holidays as they would then be unable to re-enter Australia.

Schools made significant efforts to keep boarding facilities open, to support homestay families and to provide holiday programs for these students. But not seeing their families for extended periods of time took a large 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 the need to support the mental health of students will be ongoing.

And while many schools moved to online provision for enrolled students who were offshore, this was challenging for schools, particularly in relation to year 11 and 12 students undertaking their senior secondary certificates who naturally required significant support.

Impact on international enrolments

As noted above, COVID has had a significant impact on school international student enrolments and even with the borders open again, the sector now has far fewer students enrolled than it did prior to the pandemic.

The reasons for this are varied. Domestically, non-government schools have reported that with the international enrolment pipeline being paused, spaces were very quickly filled by domestic enrolments resulting in limited spaces available when the borders re-opened.

Competitor countries, such as UK, Canada, and USA, that either opened their borders to international students before Australia or always had an onshore intake throughout 2020 and 2021, maintained or grew market share at the expense of the Australian market.

There were also challenges for schools re-entering international markets for enrolments after the COVID border closures, especially for those schools that either had smaller international programs or had paused their international program.

Staffing and resourcing

Retaining and attracting experienced staff has been a difficult area across the whole international education sector with job security being an ongoing issue. Some schools had to reduce the hours of work for international education staff to respond to the changes in enrolments. This included the redundancy of many EAL/D, HSP, ELICOS teachers and associated administration workers.

The negative response to vaccination mandates by some teachers and staff, staff contracting COVID-19 and/or the flu and managing leave entitlements and staff retention generally have been a major concern for many schools.

Providing online learning to enrolled students offshore was also a major burden on schools. As noted above, this was challenging for schools, particularly in relation to year 11 and 12 students undertaking their senior secondary certificates who required significant support. In many instances students were in different time zones which limited the opportunities to involve students in classes virtually. Providing dual modes of delivery was particularly burdensome for non-government schools where online is only being delivered to a small number of students.

Homestay programs

During the COVID border closures, many school's homestay programs reduced in size resulting in a negative economic impact on host families and providers. Third party homestay providers who rent larger houses or premises for student accommodation were affected because of low student numbers and there was a reluctance of families to participate in the homestay program due to COVID restrictions and vaccination mandates.

Conversely, families had homestay students over the course of the border closure students were at risk of "homestay burnout" as there was no respite during the Christmas holiday period as students were unable to return home. The COVID-19 isolation requirements impacted students and host families, especially if the host family included an essential worker who needed to physically attend the workplace.

Schools that had strong homestay networks:

- Invested more time in marketing and communicating with their school community and were able to better manage their homestay program as families were willing to host and take the risk.
- Held more community consultations to keep the community updated on impacts of COVID and hosting requirements.

There was also a need for host family support for students who had completed high school but continued living with homestay family while starting their next course.

MEASURES TO ATTRACT AND RETAIN STUDENTS

It is a concern to the sector that international student enrolments have not rebounded as much as had been expected in 2022. Key concerns that need to be addressed to improve Australia's reputation and attractiveness to potential international students are outlined below. A valuable part of those efforts is continued investment in promoting Australia as a study destination.

Reputation

Feedback from schools indicates that international students are now cautious about Australia as a destination given the border closures during 2020 and 2021. Schools report that while there appeared to be frustration but overall acceptance in 2020, the processes in 2021 were cumbersome and in some instances even disorganised and chaotic due to the differences between national and state and territory rules and requirements, particularly regarding quarantine, which were frequently subject to change.

This was a particular issue for schools trying to manage the movements of younger students and the need for appropriate care and welfare arrangements for students in quarantine. Schools have noted

that understanding the lessons from the COVID pandemic will be key to managing any future outbreaks.

Visa processing

The processing times for student visas since the borders have reopened have been a significant area of concern for schools and the international education sector more broadly. While the Australian Government has devoted significant resources to addressing these issues and processing times are improving, clearly the systems were not in place to manage the volume of new applications plus the backlog when international borders reopened. This has not helped Australian education providers attract and recruit students.

6. ONLINE INNOVATIONS AND OPPORTUNITIES

Online innovations in education delivery and potential opportunities to strengthen the sector's resilience

While the school sector pivoted very successfully to the provision of online learning during lockdown and border closures, feedback from the non-government school sector has been that schools are very much focused on the provision of in-person education now that students are able to return to Australian schools.

In the non-government school sector, overseas students are predominantly under 18 years old. By far the preferred approach for students in this age group is in-person instruction. Unlike other sectors which often teach students by course, schools embed English language acquisition and Australian cultural experiences across the school curriculum.

Further, 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. Non-government schools and their international students value the experience of learning which comes from being physically immersed in the context and culture of the school.

However, it is also clear that there is now increased capacity and capability in the provision of online learning in schools and ISA is aware of at least one new school that has now been approved to operate wholly online. This may provide alternate education options for students who are located offshore as well as for domestic students.

Other innovations that occurred during the lockdowns and border closures included a significant increase in online engagement by all providers including online interviews for prospective students, virtual tours, and online agent workshops. The increase in this type of engagement enables smaller providers, such as individual schools, to engage and develop relationships offshore without the significant cost outlay required in face-to-face engagement.

Other online innovations and opportunities to strengthen the sector's resilience include

- Re-imagining study tours and cultural exchange programs by offering a virtual option and virtual international education marketing events for schools to participate
- The increased agent engagement via the virtual platform (agent fairs, agent workshops, Teams/Zoom meetings) and online attendance at professional development events for international education staff has been very beneficial and could be continued.

- Curriculum Licensing Opportunities through hybrid online/face-to-face delivery is an opportunity for some providers and would counteract high living and visa costs.
- Online orientation or information hubs that are adaptive to the state and sector and online agent training that can be delivered asynchronously.

7. INITIATIVES

Initiatives to ensure positive international student experience and support pathways to build their skills and contribute to Australia's prosperity

STUDENT EXPERIENCE

Due to the role of schools in providing education to younger students and the duty of care that entails, significant investment goes into ensuring that the experiences of international students in schools are welcoming, safe and positive. This includes orientation programs, study assistance, homestay and boarding provision and support staff.

ISA is currently on the Advisory Panel for the *Best Practice International Student Engagement Project* currently being undertaken by Deakin University under the International Education Innovation Fund (IEIF). The project team is seeking to identify enabling and inhibiting factors in international student engagement and showcase good practice in supporting international students. This project includes the school sector and should help identify best practise across sectors in student engagement.

SUPPORTING PATHWAYS

Regulatory flexibility

As noted previously, the pandemic has shown that Australian education providers are flexible and agile enough to diversify their offerings to students unable to enter the country for study. Support from government and with accommodations made by regulatory authorities and government agencies is required 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, regulatory frameworks need to be flexible where required to enable ongoing innovation in the delivery of education across a range of modes of study.

Visa System

Speed and ease of the visa process has been noted by schools as a key element in making Australia more globally competitive. 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 visa application backlog from the border closures and the consequent extended visa processing times had reputational impact. It has been suggested that public statements by the Australian Government welcoming international students and encouraging their visa applications would assist the sector

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.

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.

ISA notes that a comprehensive review of Australia's migration system is currently underway and is intended to inform Australia's migration system going forward.

Partnerships and pathways

While safety has been a significant priority through the pandemic, as other parts of the world move out of COVID-19, access to education is a key determining factor for international students. Increased and diverse partnerships and pathways could contribute improving the competitiveness and support the recovery of Australia's international education sector.

Feedback from the sector suggests that there is potential in developing pathways through collaboration with higher education institutions. These pathways could also incorporate additional elements at the school level such as the provision of transition programs and incorporating lessons on preparing for university life and student portfolios in schools.

While the school sector does not generally focus explicitly 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.

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

- Ensuring that students are studying courses/subjects to assist them with university placement in the future.
- Ensuring there is international recognition and awareness of the Australian senior secondary certificates and the Australian Tertiary Admissions Rank (ATAR).
- Having clear transferable options for the ATAR to meet overseas university entrance requirements.
- 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 generate enduring pathways, potentially from primary school all the way through to tertiary studies, from tertiary study to the workforce and future permanent residency opportunities.
- Recognising the contributions international education makes to other sectors and joint partnerships (e.g., tourism, housing, employment, etc.).

- Recognition of the whole education journey – from school to university to the workplace, e.g., industry placements as part of VET pathways, project partnerships between schools and universities.
- The provision of full or partial scholarships for international students in the school sector, similar to those offered in other sectors.

Brand Australia

To maintain and strengthen Australia's marketing positioning as an exporter of quality education, more investment in international education and a whole-of-government approach is required to promote the industry across all sectors as well as offshore.

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. 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 branding at the school level, 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.²

This is a similar approach to how the Australian Curriculum is used to achieve national consistency in Australia with the one curriculum being adapted for use by each state and territory.

Safety and trust are paramount for international families, particularly in the school sector, and it has been suggested that this aspect could be highlighted and marketed more.

8. OPPORTUNITIES

Opportunities for international education to support strategic and foreign policy objectives

There is a need for schools, and indeed all providers in 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.

² NSW Education Standards Authority and Nous Group, "International Opportunities for Australian School Curriculum, Assessment and Regulatory Products: Australian International Education: Enabling Growth and Innovation," 2019, <https://internationaleducation.gov.au/>. p.37

- 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.

The many linkages that schools have internationally, such as sister school relationships, can also act as a type of soft diplomacy contributing to positive experiences and relationships, which increase awareness of Australia and strengthens our reputation.

The school sector is a significant contributor to cultural tourism, social licensing, and overall international literacy especially in the context of many of Australia's regional partnerships. By far most international students in schools come from North-East and South-East Asia (55% and 29% respectively).³

While enrolling international students contributes to the international role played by Australian schooling, there are clearly many other facets that also support and enhance Australia's reputation and relationships with other countries.

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 although in the school sector it is China that makes up the biggest share of school level enrolments and was also a large source of study tours. While in the school sector the risks posed by concentration are offset somewhat by the relatively low number of enrolments compared to other sectors, fluctuations in the relationship between Australia and China can impact enrolments. The recent progress towards normalisation of government relations is positive for international student enrolments.

However, further diversification of the source countries for international students would help alleviate the pressures on Australia that comes with relying on one or two main source countries. Opening new markets is resource intensive and there is a significant role for government to play in developing government to government relationships promoting Australia as a study destination so that education providers are feel confident to make investments in recruiting staff and students.

Diversification, while positive for the international education sector, also provides the opportunity for the development of new government to government linkages and to create new strategic relationships where previously none may have existed.

Diversification in the school sector could also 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.

³ August 2022 Year-To-Date (YTD) PRISMS data.

- Assisting small providers, such as non-government schools, to be eligible for Export Market Development Grants to assist in developing new education offerings or become established in new markets.

9. CONCLUSION

The non-government school sector has been significantly impacted by the pandemic. COVID-19 has affected students and staff alike as well as impacting on international programs, and it will take some time for schools to recover from these experiences.

It is vital that the lessons learned through the pandemic in terms of improving student experience, improving Australia's reputation and other ways to attract and retain students are closely examined and that the voices of providers are heard and acted on.

International education has, and can again, play a vital role in Australia's international engagement. The relationships built through education can be enduring and last lasting however it is imperative that entire international education sector be supported to recover and rebuild as a first step.

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