

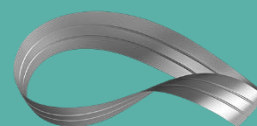
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# REVIEW OF THE POINTS TEST

DISCUSSION PAPER

ISA SUBMISSION

24 May 2024



INDEPENDENT  
SCHOOLS  
AUSTRALIA

## Acknowledgement of Country

Independent Schools Australia acknowledges the traditional custodians of country throughout Australia and recognises the continuing connection to land, waters and community. We pay respect to Elders past and present, and commit to the ongoing journey of reconciliation.



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## ABOUT ISA

Independent Schools Australia (ISA) is the national peak body for Independent schooling in Australia. ISA represents the sector on national issues and engages with the Australian Government, national agencies, media, key stakeholders, and the wider Australian community.

Working with the eight state and territory Associations of Independent Schools (AISs), ISA represents 716,800 students, over 1,215 schools and a workforce of 122,000 people.

The latest available data shows that more than one in six Australian school students attends an Independent school, and for secondary students, it is over one in five.

Students at Independent schools reflect the full diversity of Australian society – including those who experience one or more forms of disadvantage, and there is considerable diversity in the size and location of schools and the fees they charge.

The latest data shows that the majority of Independent schools charged annual fees of less than \$6,000 per year and that more schools charge less than \$1,200 per year than over \$20,000. Some Independent schools charge no fees at all.

Most families with children enrolled in non-government schools are middle-to-low-income earners, increasingly from culturally diverse backgrounds, and residing in outer-suburban and inner-suburban communities. Many of these families are making substantial sacrifices for their children's education.

Many Independent schools provide a religious or values-based education. Others promote a specific educational philosophy or interpretation of mainstream education, and many have been established by community groups seeking to meet particular needs or to reflect religious values. Independent Catholic schools are a significant part of the sector, accounting for eight per cent of the Independent sector's enrolments.

Most Independent schools are set up and governed independently on an individual school basis. However, some schools with common aims and educational philosophies are governed and administered as systems, such as Lutheran schools. These systemic schools account for 20 per cent of schools in the sector.

Independent schools are long-established partners in Australia's education system, alongside government and Catholic schools. They make a valuable contribution to society and the learning and wellbeing of Australian children.

# INTRODUCTION

ISA prepared this submission in response to the Department of Home Affairs' Review of the Points Test Discussion paper. ISA consulted with the state and territory Associations of Independent Schools (AISs) in preparing this submission.

## DISCUSSION PAPER QUESTIONS

### QUESTION ONE: HOW CAN WE DESIGN THE POINTS TEST TO BEST TARGET MIGRANT SUCCESS IN FINDING A SKILLED JOB?

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- What criteria should be included? What criteria should be removed?
- Should the weightings of different criteria change? How should points within criteria be structured?
- What should the minimum eligibility requirements for the points test be? Should there be minimum scores against particular criteria? For example, should we require an onshore migrant to have a skilled job in order to apply for a points tested visa?
- How should the points test account for migrants' experience? How should it reflect quality of experience? How should domestic versus international experience be treated?

In 2023, almost 16,000 overseas students, or 1.6 per cent of all overseas students in Australia, were enrolled in Australian schools that are registered on the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) to offer courses to overseas students<sup>1</sup>.

Of these, around 53% were enrolled in senior secondary studies, 34% in junior secondary studies, and 13% in primary school studies.

In February 2024, 8,904 overseas students were enrolled in Senior Secondary Studies in Australian schools<sup>2</sup>.

CRICOS registered schools enrol comparatively smaller numbers of overseas students compared to their cohorts of domestic students and are more geographically dispersed than institutions in most other sectors. This means school-age students (and their relatives, if accompanied by a student guardian) have opportunities to participate and become immersed in diverse local communities in all parts of the country.

In the Student Visa Program year 2022-23 to 30 June 2023, 2,610 overseas students holding a visa for the schools sector were granted a further visa to study in a Higher Education institution. 555 overseas school students were granted a visa to study VET in the same period.<sup>3</sup>

The migration points system should acknowledge the English language skills and familiarisation with Australian culture gained by young overseas students who have successfully completed secondary schooling and tertiary studies in Australia if they subsequently wish to apply for a Skilled Visa.

For these students, relevant work experience is not so important, as they have yet to determine a career pathway. However, having successfully completing senior secondary studies in Australia,

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<sup>1</sup> [International Student Data – full year data \(based on data finalised in December 2023\) - Department of Education, Australian Government](#) (Accessed 10/05/24)

<sup>2</sup> Data for school level studies for 2023 and February 2024 was extracted from Pivot tables from [International education data - Education Data and Insights | Austrade](#) (Registered User Content).

<sup>3</sup>(See 7. Destinations [BR0097 Student and Temporary Graduate visa Program Report \(homeaffairs.gov.au\)](#) at 30 June 2023. Accessed 10/05/24.)

these young people are likely to have chosen an area of study in a higher education institution suited to their academic abilities, interests, and talents.

These students will be a similar age as their domestic cohort at graduation and are likely to be well networked with their peers. Moreover, if from a non-English speaking background, in addition to being proficient in English, they will most likely be able to utilise their home country language skills in future employment contexts.

## QUESTION TWO: HOW CAN WE BETTER TARGET POINTS TESTED VISAS TO MEET AUSTRALIA'S SKILLS NEEDS?

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- Are occupation lists an appropriate way to target skills? If so, what should be considered in compiling them?
- How can we best identify and target Australia's long-term skills needs?

Occupation lists are most relevant for targeting known skills shortages in the short and medium term, and not so relevant for longer term predicting future needs.

## QUESTION THREE: HOW SHOULD WE REDESIGN THE POINTS ALLOCATED TO AGE TO BETTER SELECT YOUNGER MIGRANTS?

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Points could be allocated at a younger age to include a category for secondary school studies in Australia.

Contemporary education systems and frameworks such as the United Nations Sustainable Development Goals<sup>4</sup> acknowledge the importance of 21 Century skills in preparing students for future work, in careers that do not yet exist.

The Australian Government Department of Education explains the significance of 21<sup>st</sup> Century learning skills in Australian Schools:

*21st century learning is the development of a highly valuable skill set for the future. 21st century skills are flagged as critical for the digital and evolving economy. Instead of specific subject knowledge, 21st century skills are ways of thinking, ways of working and ways of living.<sup>5</sup>*

Overseas students who have achieved academically in Australian schools have already been immersed in an education system that values the skills needed for future work.

Families of students who have studied in Australia at secondary school and continue tertiary studies here have made a significant investment in their children's education and have demonstrated considerable regard for and faith in the Australian education system.

These young people comprise a potential pool of young migrants who can productively contribute to the Australian workforce and society while maintaining strong links with their families abroad.

Given the importance of international education to state and territory economies<sup>6</sup>, and the investment made by governments to attract overseas students to study in diverse locations in their jurisdictions, the migration points test should be structured to increase the number of places in state and territory nominated migration places available to younger overseas students who have completed their studies and are seeking to stay to work.

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<sup>4</sup> <https://sdgs.un.org/goals> (Accessed 10/05/24)

<sup>5</sup> [Links to 21st century learning - Department of Education, Australian Government](#) (Accessed 10/05/24)

<sup>6</sup> [Education export income - Calendar Year - Department of Education, Australian Government](#) (Accessed 22/05/24)

It may also be possible for states and territories to consider prioritising overseas students who have studied at schools and then tertiary institutions outside the major capitals for Regional Skilled Work visas.

#### **QUESTION FOUR: HOW SHOULD WE DESIGN THE POINTS ALLOCATIONS FOR PARTNERS TO BEST REFLECT THEIR POTENTIAL LABOUR MARKET CONTRIBUTIONS?**

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This question is not relevant to ISA's submission.

#### **QUESTION FIVE: HOW COULD THE POINTS TEST SUPPORT GENDER EQUALITY IN THE AUSTRALIAN LABOUR MARKET?**

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There should be no gender-determined wage disparity for any employment opportunities in Australia.

#### **QUESTION SIX: HOW SHOULD TRANSITION ARRANGEMENTS FOR THE POINTS TEST REFORMS WORK?**

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ISA's submission that school level studies should be considered as a contribution to points in a Skilled Migration application of an overseas student who has successfully achieved an Australian Senior Secondary Certificate of Education in Australia and an Australian tertiary qualification is a new proposal.

If adopted, it could simply be added as an additional points category or as bonus points to another category.

The overall number of overseas students this additional inclusion in the points test might benefit is relatively small, but the potential value-add to Australia's workforce is proportionally large.

ISA would be happy to discuss our submission or be involved in further consultation.

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