



23 September 2024

Senate Education and Employment Committees
PO Box 6100
Parliament House
Canberra ACT 2600

Email: eec.sen@aph.gov.au

Dear Senate Education and Employment Committee,

Inquiry into the Education Services for Overseas Students Amendment (Quality and Integrity) Bill 2024 [Provisions]

Independent Schools Australia (ISA) welcomes this opportunity to provide a supplementary submission to the Senate Education and Employment Committee's Inquiry into the Inquiry into the Education Services for Overseas Students Amendment (Quality and Integrity) Bill 2024 [Provisions].

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.

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 also represents the National Catholic Education Commission (NCEC) in matters relating to International Education.

Non-government schools generally enrol relatively small numbers of overseas students compared to domestic students and often do so to achieve diversity in their student cohorts. In 2023, the average number of overseas students in an Independent school was 13 students. Their focus in International Education programs is on their students and student outcomes and they are generally considered to be low-risk providers.

According to Austrade data, the school sector accounts for two per cent of total overseas student enrolments with the non-government school sector enrolling less than one per cent of all overseas students. Overseas student enrolments in the school sector have yet to recover to pre-COVID levels. Overseas student enrolments in May 2024 were 15 per cent below May 2019 numbers in government schools and 38 per cent below in non-government schools.

In ISA's previous submission to the Inquiry, ISA noted that "if limits on enrolments or courses are imposed in other sectors, consideration should be given to the number of places available in tertiary institutions that will be needed for overseas students completing Senior

12 THESIGER COURT
DEAKIN ACT 2600
PO BOX 324
DEAKIN WEST ACT 2600
T +61 2 6282 3488
WWW. ISA.EDU.AU
@INDSCHOOLS AUS

Secondary studies in Australian schools, and in secondary school Transnational Education (TNE) programs delivered by Australian providers offshore.”

Since then, the Australian Government has confirmed that while the school sector will be exempt from caps, once school students have completed their Senior Secondary studies in either Australian schools or in Transnational Education (TNE) programs delivered by Australian providers overseas, they will be included in the enrolment caps of tertiary institutions.

If the pipeline for study opportunities to tertiary sectors is removed, the impact on the enrolment of overseas students in the school sector will be devastating. Students completing Year 12 in an Australian secondary school, either onshore or offshore, need certainty about their academic pathways before beginning secondary school studies.

The number of overseas students transitioning from secondary school studies to tertiary studies in Australia that would need to be accommodated outside caps would be minimal. According to Department of Home Affairs Student visa and Temporary Graduate visa program reports, around 3,200 overseas students in Australia with a school sector visa were granted a further visa for the Higher Education and VET sectors in 2023.

ISA strongly advocates that the school sector should be made exempt in legislation from changes to the ESOS framework that are primarily intended for other sectors, and overseas students transitioning from the school sector into tertiary sectors should likewise be exempt from overseas student enrolment caps.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Graham Catt', with a long horizontal flourish extending to the right.

Graham Catt
Chief Executive Officer