

NEAS AUSTRALIA RESPONSE

National English Language Teaching Accreditation Scheme (NEAS) response to the Consultation Paper ‘*Connected, Creative, Caring: Australian Strategy for International Education 2021-2030*’.

NEAS Australia congratulates the Department of Education Skills, and Employment (DESE) on the consultation paper ‘*Connected, Creative, Caring: Australian Strategy for International Education 2021-2030*’ and welcomes the opportunity to provide a response on behalf of NEAS Australia members. This is an incredibly important document released at the most difficult time the International Education Industry has ever experienced and it bravely attempts to make projections and predictions for the future against a backdrop of incredible uncertainty.

The Consultation Paper recognises the contribution international students have made to our nation.

It identifies the four key roles:

1. Advances Australia’s Economy and Society
2. Enriches the experience of Australian students.
3. Meets the future skills needs in Australia and overseas.
4. Builds strong links and soft power connections to Australia.

Given the current environment it is essential that benefits to Australia from the industry are seen as multi-faceted not just focused on economic returns.

Discussion questions

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

NEAS Australia believes it is the quality of the student experience that is the key priority for a new strategy. Quality assurance and standard development is the core business of NEAS and this issue consistently rates highly in satisfaction surveys of International Students. The post COVID world for International Education will rely heavily on on-line delivery and the quality of this learning experience will be critical to the future of the international education industry in Australia.

The biggest risk to Australia’s reputation internationally as a quality education provider could lay in those areas that are not regulated by ASQA or TEQSA, for example, short term courses, offshore programs, courses for migrants and refugees, non-award programs, work readiness programs, internships, and test providers.

The Consultation Paper suggests ‘*the Strategy is an opportunity to explore innovative ways Australia can expand its footprint including digital delivery, blended learning, micro-credentials, stackable short courses and more, while maintaining our academic standards and reputation*’ and further references

the importance of *'setting the standard and how the Strategy could look at how to ensure quality is maintained ...regardless of where international students are'*. However, the Consultation Paper fails to identify any concrete suggestions as to how quality could be monitored and regulated in a post COVID world.

Government needs to recognise that *'regulatory limitations'* present great risks to the Australian International Education Industry in the future.

Recommendation A: Government needs to develop a stronger regulatory framework for a POST-COVID world. Organisations like NEAS Australia, who is regarded as a global leader in quality assurance, should be at the forefront of the development of such a POST-COVID regulatory framework.

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?

The International Education Industry is a large and dynamic one and not just the domain of Universities. Students studying in all sectors should be at the centre of how those businesses operate. This should not be seen as a new concept. A high-quality student experience is critical to the industry's standing in the world.

Consultation with students has improved enormously over the years and DESE needs to be congratulated for ensuring the President Council of International Student Australia (CISA) is a member of the International Education Council (IEC).

There is no doubt that there are well known complexities associated with how a student may assess their own satisfaction. Government and regulators need to ensure student satisfaction is front and centre of the regulatory frameworks, but this should never come at the expense of quality. Providers should never lower academic standards to influence student satisfaction.

In the past Australia's reputation as a quality provider of international education in the VET Sector suffered enormously. There were many issues at play that resulted in this perception of loss of quality however partially there was a regulatory failure at both a state and federal level.

A POST-COVID world will be a vastly different environment for education providers who want to operate internationally. There will be increased competition, a slow return of students, possibly fewer students and students who want to study in a vastly different way. This could all provide an opportunity for quality to become compromised in the interests of economic gains.

Recommendation B: Government needs to allocate further support and funding into the further development of quality and standards and innovative regulation for all products and services including agents, teaching, and learning products and teaching professionals. This could be through contracting or deeds of authority with organisations such as NEAS.

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

In recent decades in order to achieve the status of a Global Leader, Australia has done an excellent job marketing itself as a safe, welcoming country with a quality student experience.

Even before COVID-19, the industry was beginning to feel the winds of change with the number of international students beginning to drop in some sectors. Political power has been shifting from west to east over recent years and the concept of globalisation has begun to change. Nation states have had to focus on themselves and there may be a greater need for them to keep their best and brightest students at home rather than send them off to study overseas.

In 2021, as the COVID 19 pandemic continues, it is clear that our global competitors in the International Education space like Canada, the UK and the US are using this crisis as an opportunity to reboot their ailing industries. The early opening of their borders and offering migration outcomes to potential students have been two of the most successful tools resulting in attracting more international students into their institutions.

Despite the change in the geo-political state of the world, recent data from Education Agents particularly in South America indicate an increase in the number of young people eager to leave their homelands. This is not only because of COVID but also the corresponding economic and political fallout from the pandemic.

The link between migration and education has been a vexed issue for some time. Australia currently has zero net migration, and all indications are that it will be years before we return to pre-COVID migration figures, if ever.

Recommendation C:

1. It is time for a migration outcome to be considered for international students with Australian Qualifications. The current Skills Commission should be the starting point for the conversation about the link between education and migration.
2. Research into Global and Australian Skills needs post-COVID should be conducted by DESE in 2021.
3. All migration outcomes for international students should be linked to current and future skills needs.
4. Quality standards in all areas of the English language teaching community should be explored and benchmarked against standards in other countries (NEAS does this annually as part of its membership requirements for QALEN www.qalen.org).

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

The international education industry is a large and diverse one and at times it is fractured. The Consultation Paper sets out the diversity of the industry by including ‘an array of auxiliary industries’ including:

- Accommodation,

- Tourism
- Health
- Research
- Retail
- Hospitality

With Quality Assurance being critical to Australia's reputation globally, Quality Assurance agencies like NEAS should also be included as an auxiliary industry.

During COVID there has been a clear attempt by the industry to work together. The 'industry' recognises there will always be inherent conflicts between public and private, education providers and auxiliary industries. However, there needs to be a thorough attempt to have a more cohesive industry that can work together and speak with one voice.

Diversification of products, source countries, delivery modes etc are in many cases decisions made by individual businesses. These decisions are made based on the analysis of sound data and evidence.

Recommendation D:

1. Government has a responsibility to ensure that sound real time national and international data is made available to all within the industry so appropriate business decisions can be made.
2. Formalise an Industry led body e.g., **Industry Roundtable**.
3. Create an Agency e.g., International Education Commission modelled on the Skills Commission which bring Government agencies together with the Industry Roundtable. These two bodies should be consulted prior to any government or policy or announcements, for example, the shock announcement of changes to the 408 visas on 7 May 2021.

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

Despite the uncertainties of the Post -COVID world which will include major shifts in the geo-political order of the world and some major changes to the concept of globalisation there is no question the demand for quality English language will increase as English will continue to be the predominant language of choice internationally.

In a highly competitive post-COVID global market, students will make their decision where to study and what to study based on several indicators including cost, the quality of the student experience and a welcoming community. One key factor will be the opportunity to gain experience with industry while studying. This could include internships, industry-based learning, post study work rights and even volunteering.

These experiences will enhance the student's employability post-graduation. Employability skills are critical for the graduation outcomes of international students. Many of these students would be a great asset to industry particularly industries that have a global presence.

There are several issues international students face when accessing Work Integrated Learning (WIL) programs:

- Visa issues

- Discrimination
- English language barriers
- Industry reticence to become involved.

Recommendation E:

1. Support and funding to build the professionalism of the English Language Teaching community with the International Education and Training sector by development of standards, recognition, and ongoing professional development of English Language teachers.
2. Funding and support should be made available for the creation of a Professional Association for English Language teachers. NEAS Australia has already set standards for English language teaching professionals <https://neas.org.au/quality-elt-professionals/> , but this could be further funded.
3. The IEC should set Work Integrated Learning (WIL) as a priority for this strategy and identify what steps can be taken to remove the barriers identified, particularly visa issues, and industry reticence to become involved in WIL programs.
4. The IEC and Industry Roundtable should have industry representatives as full members.

How do we create a uniquely Australian education experience?

The Consultation Paper suggest that this strategy will guide the international education industry over the next decade. The Consultation Paper paper suggest the vision for a uniquely Australian education experience as follows:

‘Australian education is trusted for its ingenuity, drive to find solutions and focus on collaboration, talent and expertise. Australian graduates are characterised by a willingness to share ideas and think critically.

The Australian education eco-system is built on unrivalled government and private sector collaboration, driving continuous improvement in quality assurance, employability outcomes and student protections.

At the heart of our education and training system is our engagement with industry.

As the most successful multicultural society in the world, we lead in intercultural competencies and understanding. These attributes prepare our graduates to work anywhere in the world’.

Recommendation F:

1. In order to achieve ‘unrivalled government and private sector collaboration’ key industry stakeholders and industry bodies should be represented on the IEC and the proposed Industry Roundtable (not just peak bodies).
2. Government needs to allocate further support and funding into the further development of quality and standards and innovative regulation for all products and services including agents, teaching, and learning products and teaching professionals.

3. The IEC should set Work Integrated Learning (WIL) and sound engagement with industry as a priority for this strategy and identify what can steps can be taken to remove barriers to successful partnerships with industry.

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 wider community?

International education relies heavily on the support of the wider community to provide a welcoming and positive environment to all our guests. For many decades, the International Education industry has worked hard to garnish the support of the wider community. However, unlike other major industries the average Australian was unaware of the importance of the International Education industry to Australia. The industry has learnt to not rely on the economic narrative to gain community support.

The creation of the IEC was a major step forward in gaining support from Government and having six Federal Cabinet Ministers on the Committee is a huge step forward and represents one of the only countries in the world with such a body.

Recommendation G:

1. Champions of International Education are required. These need to be respected members of the community and well know nationally. They could be well informed state and federal senior politicians like State Premiers, Ministers etc. or household names who could advocate on behalf of the industry across all forms of media.
2. Funding should be made available for PR Campaigns with nationally agreed and consistent messaging to be run by all key stakeholders and Peak Bodies to inform their constituents, stakeholders, and partners.
3. Study Groups nationally should be encouraged to include community members and unions on their Boards.

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

The CIE should be congratulated on the work they have done in the development of this Consultation Paper. The CIE plays a key role the development of the Strategy but will in future play an increasingly strategic role in the implementation of the Strategy.

Listed below are a number of recommendations for the Council in developing and implementing the Strategy.

Recommendation H:

1. It is time to review the membership of the IEC. Membership should be broadened to include more of key stakeholders like NEAS Australia. NEAS represents large segments of the ELICOS and English Language Teaching sectors in Australia. NEAS represents 186 centres over 108 organisations of which 50 Australian providers of ELICOS are not represented by peak bodies such as English Australia, IEAA, or ITECA. In addition, organisations like NEAS have an unrivalled global reputation and are taking a leading role internationally in the quality assurance of online and offshore education.
2. The Purpose-Built Student Accommodation Peak body SAA should also be a member of the IEC.
3. The council should recommend to government to increase investment into organisations which operate both domestically and internationally to enhance global education, recognition of Australian quality education, business development and partnerships with source countries for international students.