



International Group
Department of Education, Skills and Employment
education-ies@dese.gov.au

Dear International Group

Subject: Response to the consultation regarding the development of the *Australian Strategy for International Education 2021-2030*

Thank you for your invitation to provide feedback on the draft proposed *Australian Strategy for International Education 2021-2030*.

As you will be aware, under the objects of the TEQSA Act, TEQSA is responsible for protecting and enhancing:

- Australia's reputation for high quality education and training services
- Australia's international competitiveness in the higher education sector
- Excellence, diversity and innovation in higher education.

TEQSA's role in assuring the quality of Australian higher education, and in protecting students, remains important given the impacts of the COVID-19 pandemic and the associated rapid development of new modes of learning and models of delivery.

Following publication of the first *National Strategy for International Education 2025* in April 2016, TEQSA developed a supporting *International Engagement Strategy 2016-2020*, the principle objectives of which were:

- Quality assuring Australian transnational higher education
- Supporting Australian transnational higher education activity and innovation
- Building cross-jurisdictional networks and collaborating to ensure quality

TEQSA has developed a network of international quality assurance agencies, predominantly in countries where Australian providers are operating, enabling TEQSA to lead discussions about quality assurance, regulation, and risks in higher education. Most recently, TEQSA has shared best-practice on regulating and enhancing the quality of online learning with international quality assurance partners, due to the rapid take-up of this mode of delivery by providers in response to the COVID-19 pandemic.

These activities highlight the importance of a robust national strategy for international education, especially in the face of rapid and significant change and uncertainty brought about by the COVID-19 pandemic, and the role of regulatory and quality assurance agencies such as TEQSA.

TEQSA provides the following feedback to help ensure that the new *Australian Strategy for International Education 2021-2030* provides a basis for robust policy and regulatory approaches and responses that assure the ongoing viability, quality and growth of Australia's international higher education industry.

TEQSA believes that the strategy would benefit from a robust analysis of strengths, weaknesses, opportunities and threats (SWOT) for the international education sector in the face of the COVID-19 pandemic and associated developments.

- This could include an assessment of the extent to which international education has achieved or met the four key roles identified in the section on “Our Story” and where there are opportunities or priorities for addressing any gaps.
- Likewise, the extent to which the sector has demonstrated innovation, flexibility and resilience in response to the impacts of the pandemic could be more closely examined, identifying ongoing challenges or shortcomings as well as areas of success.
- The consultation paper would benefit from an examination of the range of potential scenarios from the pandemic (and geo-political overlay), ranging from best to worst case, and the capacity and preparedness of the sector (and policy and regulatory settings) to respond.

Discussion questions

In responding to the discussion questions posed in the consultation paper, TEQSA seeks to highlight or bring into focus some key matters for further consideration. These are not intended to be exhaustive, and TEQSA looks forward to the opportunity to further engage prior to the finalisation of the strategy.

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

- TEQSA believes that the key priorities of any international education strategy should be to:
 - enhance the quality of teaching and learning at Australian educational institutions and the overall student experience
 - contribute to Australia's economic development, trade and investment competitiveness, and cultural and social interlinkages with key international markets
 - ensure Australian education offerings are competitive, contemporary, and relevant for both students from, and the socio-economic development of, key international markets
 - offer foreign student exposure not just to high educational standards but also to Australia's cultural diversity, robust liberal democracy and high socio-economic model, as well as specialised areas of inquiry and research, competitiveness, innovation and entrepreneurship.
 - offer domestic student exposure to the cultural diversity, international perspectives and opportunities for lasting people-to-people and other links offered by foreign students.
 - promote Australia's reputation for delivering quality research, including in partnerships with global networks.
- The strategy should be focused on the ongoing quality and viability of Australia's international education products and offerings. From a quality assurance and regulatory perspective this means ongoing adherence to higher education standards (through the Higher Education Standards Framework (HESF)) not just for onshore provider activity but also offshore, including through third-party arrangements for education delivery.

- In developing an international education strategy, the viability of current modes of delivering services to foreign students in Australia, or offshore, and the role of technology and innovation in creating new modes of delivery, must be considered.
 - From a regulatory perspective, how can the quality of these offerings – and the reputation of Australian higher education - be assured? The student experience of online learning, offshore, will be critical.

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?

- TEQSA endorses the student-centered approach in the proposed strategy. The HESF have been operational for 10 years and are centered around the student lifecycle. International higher education offerings by Australian providers must continue to align with these standards.
- It is important that the foreign student experience of Australian international education remains uniquely Australian. A principal attraction of Australian international education is not just gaining an award through exposure to high pedagogical standards, but also through exposure to Australia's cultural diversity, robust liberal democracy and high socio-economic standards of living.
- A largely unstated (and under-recognised) reality has been, in effect, the isolation of some foreign student cohorts from their Australian counterparts. This has emerged by design (large proportions of foreign students, often from a single market, in particular courses of study) and as unintended consequences (concentrated auxiliary services such as housing, or inadequate student support) of rapid growth. In places it has been to the detriment of the foreign and domestic student experiences.
 - The balance between, and integration of, overseas and domestic student experiences needs to be considered more centrally as part of Australian international education offerings, and explicitly dealt with in a strategy. This might extend to consideration of quotas on places in courses, for example.
- A further challenge is to ensure equivalency of student experience not just between foreign and domestic cohorts, but between on-campus and online offerings, and between onshore and offshore delivery. In other words, the sector needs to consider how an Australian education experience is a quality engagement in study, irrespective of a student's origins, location or mode of study.
 - Recent indicators suggest that digital offerings are accompanied by a lack of contact between staff and students, evidenced by declining student satisfaction in QILT scores during the pandemic, and concentrated in providers most impacted by lockdowns. This effect has particularly impacted offshore students who were enrolled in on-campus study in Australia but have been studying offshore due to travel restrictions and would traditionally rely more heavily on in-person, on-campus learning to foster connection and engagement with their education.

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

- Protecting and enhancing the quality of Australian higher education and the student experience is critical to Australia's global competitiveness in international higher education. The role of robust regulatory assurance in upholding the HESF, particularly in the midst of rapid change and increased uncertainty, is critically important.

- The COVID-19 pandemic, overlaid by geo-political developments, has exposed the inherent weakness of business models for Australian higher education institutions that have been heavily reliant on income derived from overseas students from just two major markets – China and India. Country and political risk management needs to be at the forefront of necessary changes to these models, including market diversification and the extent of, or reliance on, cross-investment for research.
- The quality of Australian international education should be considered first and foremost on its own (pedagogical and other) merits, and not in and of itself based on profitability/income, opportunities for cross-investment in research, or links to employment and migration. These are important considerations in any strategy but should not themselves dictate the structure or content of international education offerings in Australia or by Australian providers.
 - The shift from higher to vocational education amongst foreign students still in Australia during the pandemic highlights the prevalence of migration points in both the incentives for and structure of education offerings for overseas students. This is a risk to quality, and in the long term to competitiveness. There is an opportunity now to reconsider policy and other incentives for international education in this context.
- There is an opportunity to address key risks to the quality of international education, especially given the current pressures on financial viability of many providers, in any strategic 'reset'. First and foremost, admission practices need to ensure students have the necessary attributes to succeed in their course of study, and that they be clearly articulated and rigorously upheld. In particular, students must have the necessary English level skills to undertake study, regardless of whether the offerings are onshore or offshore, or delivered directly or through third-party arrangements.
 - Admissions standards and English language proficiency are just two areas of risk to the ongoing quality of international education. Others include academic cheating, cyber security weaknesses, and the role of 'micro-credentials' and 'stacking' of awards. While these risks are present in most markets, there is an opportunity to ensure Australian systems and standards in mitigating such risks are recognised as world-class.

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

- Rapidly changing risk profiles, and the need for policy and regulatory responsiveness to help assure both quality and competitiveness, demand high quality and 'real-time' data on the state of the international education sector. There has been progress, as noted in the consultation paper, but at present, data regarding the sector still relies on various "collection points", is focused on onshore providers, and is prone to inconsistency and variable quality.
 - Data analytics remains a significant challenge and opportunity both for the sector itself, as well as for policy and regulatory agencies.
- Ideally, there needs to be a focus on mapping government activity to ensure a streamlined and coordinated use of government resources and initiatives. This mapping needs to reflect the ongoing work of both tertiary education regulators, ASQA and TEQSA, in international engagement.

- Further, all stakeholders need to undertake feasibility and planning for future scenarios. Once vaccination uptakes increase and borders reopen, stakeholders need to consider international higher education beyond a “snapback” to previous markets and practices. Strategies for future models of international higher education across a range of countries, modes of delivery and activities need to be developed that highlight the quality and innovation of Australian higher education. These strategies should also reflect the shifts and changes in international higher education demand (and supply) in different countries and Australia's competitiveness in new and emerging markets.
- There are a number of initiatives that TEQSA, as the regulator and quality assurance agency, could develop to enhance Australia's reputation for international education. For example, TEQSA could accredit programs and institutions offshore and provide a range of capacity-building services. TEQSA has been approached by numerous countries and international providers to accredit programs and institutions against the HESF and to provide ongoing advice and services.
- In TEQSA's view, the strategy should envisage streamlining and incorporating the requirements for CRICOS and the National Code – in particular, those elements relating to student wellbeing and safety - into the HESF. Combining registration and re-registration requirements for providers into one process, for example, could result in reduced fees and could also be adopted across other sectors e.g. VET.

5. What are the necessary skills for the future that students should be prepared for? How can Australia improve employability outcomes for international students, ensuring they have the necessary skills to compete in a globally competitive labour market?

- Much has been written about the key skills and competencies students will need to operate in a future global workforce and these skills evolve as technologies are adapted and the characteristics of the global workforce evolve. The challenge for any provider globally is to ensure that the curriculum they deliver is relevant.
- The HESF reflects the student life cycle and has been designed to underpin the quality of the student experience. The quality of the student experience is in part a reflection of the quality of the curriculum providers deliver, and the employability and life skills students gain through their studies is relevant to all students. Further, the HESF and TEQSA regulated seven-year review cycle requires comprehensive review of all courses of study and this takes into account developments across, discipline pedagogy, modes of delivery and the quality of the student experience.

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

i. What is our value proposition for international and domestic students?

- The value proposition of an Australian education experience is based on the quality of Australian higher education, underpinned by the HESF.

ii. How do we offer an Australian education experience while complementing the value of Australian offshore and online education?

- The strategy should consider the possibility of supplementing offshore and online education with opportunities to attend their provider physically where possible. International students have indicated that they will seek an education in countries where physical attendance is possible and Australia risks losing significant market share if it does not implement strategies to address this

desire for onshore and on campus interaction. Alternatively, efforts should be made by providers to establish virtual activities to enhance the student experience and to provide appropriate student support services. The Australian education experience should be provided for students regardless of study mode.

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 wider community?

- The sector and individual providers should work to establish strong links between international education and domestic communities. Benefits could be further explored through direct exposure to the international education sector and its capacity to contribute to the domestic economy.

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

- TEQSA would like to encourage better data collection and transparency of reporting. For example, with robust and current data on the number of students studying offshore at a campus or offshore online. With recent data that more accurately captures the increase in students studying in either offshore mode particularly as a result of COVID-19, TEQSA will be able to better ensure the quality of courses being delivered offshore and therefore protect Australia's reputation in higher education.
- The Council and Government should also consider the continuing risk to student satisfaction, retention, and graduate outcomes (as seen in 2020 QILT SES data). Digital education and diverse delivery options present a significant challenge in appealing to all students, especially in a competitive global market. Digital offerings will need to be innovative and distinguished if they are to be sustainable in the long term. This will require substantial investment in digital teaching pedagogy and learning research, approaches and technology.

Further, we would like to request that TEQSA and ASQA be involved in further discussions around the international strategy policy agenda as the strategy is finalised.

Should you have any queries about TEQSA's response, please contact Emily Goode, Stakeholder and Digital Manager at emily.goode@teqsa.gov.au.

Yours sincerely,



Alistair Maclean
Chief Executive Officer
19 May 2021