

29 April 2022

The Regional Universities Network (RUN) welcomes the opportunity to comment on the Education Services for Overseas Students (ESOS) Review 2022.

RUN is a national collaborative group of seven regional Australian universities: Charles Sturt University, CQUniversity Australia, Federation University Australia, Southern Cross University, University of New England, University of Southern Queensland, and University of the Sunshine Coast. This RUN submission does not prohibit RUN universities from making their own submissions addressing in detail any specific issues they wish to explore with the discussion paper. It should be noted that RUN is supportive of the submission from Universities Australia.

While RUN only represents approximately three per cent of Australia's international university student market, international students represent 25 per cent of RUN university enrolments¹. International students are fundamental to RUN universities and provide numerous benefits to the cultural and educational ecosystem of regional Australia.

RUN is acutely aware that the ESOS Review 2022 paper is narrow in scope, and that there are a multitude of interacting elements and therefore would like to highlight the overall value that would be realised by ensuring alignment between various Commonwealth and State Government entities, instruments and legislations frameworks.

Expansion, diversification and flexible study

The ESOS framework in isolation cannot deliver the expansion and diversification being sought in the Australian international student market. The assumption that international students wish to study online must also be questioned. Research conducted in 2021 found that only 18 per cent of international students seeking to study in Australia as their first choice, had a preference for non-onshore study experiences with 81 per cent of those students either willing to begin their studies online as long as they could transition to onshore study or defer their commencement until onshore study was possible². There are a range of reasons that factor into the student decision making process, however some of the reasons for students wishing to pursue an on-campus experience are the benefits of having an Australian degree and the real-world skills and experiences that an Australian higher education experience provides.

Not all students will consider the same factors when deciding on their educational needs, and some students will decide that online study does not meet their needs. For students who are considering an offshore online experience, or even in the cases of domestic students seeking an onshore online experience, there is a common belief that online courses should be priced below traditional on-campus study. Online education is not just simply recording a lecture and placing it online, rather there are a range of costs associated with ensuring a high-quality online education experience. These additional costs are far ranging and include IT infrastructure and software licensing costs, the costs involved with designing, resourcing and delivering online courses including training of staff, student verification techniques, proctoring of exams, and ensuring students are supported.

¹ Department of Education, Skills and Employment - Higher Education Statistics Data Cube

² <https://www.idp-connect.com/apac/articles/data-intelligence/report-crossroads-iv-international-students-will-quarantine-and-get-vaccinated>.

At present, ESOS does not allow for more than a third of a qualification to be delivered online and this is a significant impediment to fully embracing the flexibility that high-quality hybrid higher education provision can provide. RUN believes that there should be additional flexibility in relation to on-campus and online course delivery to reflect the existence of high-quality blended learning in supporting expansion and diversification of international education.

Meeting skills needs and graduate workplace readiness

The mismatch between international education and Australia's long-term strategic priority employment needs requires greater strategic alignment. This calls for a broader discussion with government, industry and education provider stakeholder groups. It is unreasonable and illogical to expect that international students would study a course that meets Australia's priority employment fields, and not one that enables them to have post study success in their home country, when over 80 per cent of students return to their home country³. If the majority of students are expected to return to their home country, then they must be allowed to complete a degree that enables them to be successful in their home country in much the same way that domestic students are allowed the freedom to pursue the qualifications that will enable them to fulfil their educational and professional aspirations.

RUN notes that post-study work rights are currently partially coupled with regional study. We believe it is important that regional coupling of post-study work rights is maintained to ensure that skilled migrants remain attracted to Australia's regions.

A potential change that would have substantial benefits for international students and preparing them for the opportunities that post-study work rights provide would be changing regulation relating to work-integrated-learning (WIL). Decoupling WIL from paid working hours would enable international students to not only benefit from the opportunities that WIL provide to students as part of their study, but also enable international students to maximise their opportunities to engage in all aspects of Australian life.

Course transfers

Standard 7 of the National Code of Practice limits student transfers between providers within the first six month of study. The six month limitation on transfers ensures that there is a genuine intent from students to study with a specific provider. Any reduction in the six month limitation would undermine Australia's migration policy, encouraging non-genuine migrants to enter Australia with no clear intent to study. RUN strongly believes there should be no reduction of the six month limitation on transfers between providers. In fact, some RUN universities can rightly argue that in certain courses and cases, the transfer period be extended up to 12 months. The main reasons for student transfers relate non-study related reasons such as: student homesickness; moving to live with a friend; or enrolling in a less expensive course, or cheaper accommodation.

Institutions invest time and money to recruit students into courses, and in many cases when a student leaves either before or after the six months there can be a loss for the institution in recruitment costs. Public institutions are not for profit, and while RUN's concern is not primarily financially focussed, having the mandatory six month restriction is vital to ensuring that institutions can plan the finances and student load accordingly. Furthermore, this current restriction period allows time for the student to have a better understanding of their educational experience with their institution, and enables the student to gain support academically and socially to ensure that they settle into what can be a new experience.

³ <https://research.treasury.gov.au/external-paper/shaping-a-nation>

Written agreements

RUN does not believe that additional regulations pertaining to written agreements needs further focus at this time. Despite this, RUN believes that additional templates, and standardised materials as part of a best practice toolkit would add value to protecting the reputation of Australia's international education sector.

English language

RUN does not support the inclusion of additional independent assessment of international students' English language proficiency. It is in the best interest of Australia's universities to ensure that international students have the requisite English language proficiency to succeed in their studies and benefit from the transformational education experiences that Australian universities provide. Universities already utilise independent services to assess the English language proficiency of students during their application for the study, so any further assessment would not be beneficial to the students, the Government, and Australia's higher education sector.

General questions

There are aspects of ESOS that may no longer be fit for purpose, and these aspects have become increasingly apparent during Covid. The aspects include most of what has been consulted upon in this ESOS consultation paper, including increasing the flexibility of online provision for international education and work-integrated-learning. As outlined above, greater flexibility in the provision of online and mixed mode teaching would enable seamless transition across various delivery modes and would reduce regulatory burdens for providers.

The ESOS framework is a detailed regulatory framework with significant overlap with other frameworks that exist in the higher educational and vocational sectors. Reducing duplication across the frameworks and simplifying the provisions would help to reduce regulatory and compliance burdens. Increased effective regulatory cooperation between TEQSA and ASQA where dual sector providers are concerned would yield significant benefit to both sectors.