

Submission: Draft National Strategy for International Education

About Navitas

Navitas Ltd is an Australian global education partner providing pre-university and university programs, English language courses, migrant education and settlement services, creative media education, student recruitment, professional development and corporate training services to more than 80,000 students across a network of over 120 colleges and campuses in 27 countries. Navitas listed on the Australian Securities Exchange (ASX) in 2004 and is now an S&P/ASX Top 100 Company, employing more than 5,800 staff globally.

General comments

Navitas commends the Government for:

- Responding positively to, and adopting, all the recommendations of the report of the International Education Advisory Council, chaired by Michael Chaney AO, *Australia – Educating Globally*.
- Recognising the critical importance of international education to Australia, developing a national vision, strategy and approach, and establishing 'a ministerially led coordinating council for international education'.
- Developing a 10-year market development strategy, *Australia International Education 2025*, to inform, support and focus investment and actions in delivering on the national strategy.
- Consulting with the international education sector, business and industry, and communities on the development of the strategies and their implementation.

Navitas welcomes the support given by various levels of government to international and transnational education, and the recognition by governments of the contribution the international education sector makes to economies and societies, both in Australia and globally.

In the Strategic Actions we endorse the progress that is being made on a whole of government effort, including current reviews and consultations into the student visa framework, ESOS Act and National Code, all of which are integral to an integrated regulatory and support framework for the sector. We urge government to continue to co-ordinate across portfolios, and engage effectively with the sector. In particular, there is scope to improve the communication and effectiveness of regulators, especially TEQSA and ASQA, and application of the Australian Qualifications Framework to support the sector and underpin confidence in its quality and integrity.

We endorse the focus of the report on maintaining international education as a key export industry and strengthening Australia's reputation as a high quality education provider. We also commend recognition of the importance of the student experience, support for contemporary online and flexible approaches to teaching and learning, and consideration of competitive visa settings. The recognition of the importance of pathways into and through the student journey is significant.

Australia has a long and successful record in the development of the global international education industry as it is today. There are many strengths and learnings which we can draw upon to continually improve the industry's quality and competitiveness. The three pillars of the draft national strategy, '*getting the fundamentals right*', '*reaching out to the world*' and '*staying competitive*' provide a strong organising framework for action.

While the draft national strategy is very strong in enhancing current capabilities and building on areas of excellence and strength, Navitas believes more weight should be given to the profound and irreversible changes occurring, and that will occur, in the delivery of education (both domestic

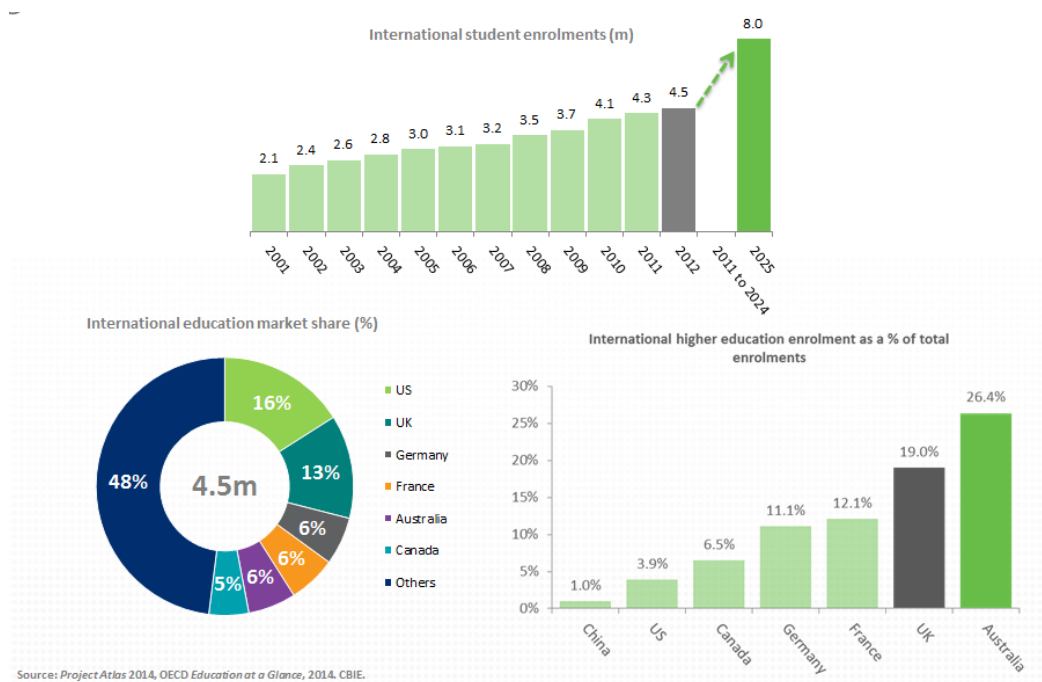
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and international) over the coming decade. These changes are being driven by developing and emerging economies, young and ageing populations, geo-political forces, technological advances, and resource, health and environmental issues. Responses to virtually all of these factors require different mindsets, capabilities, and collaborations. The strategy would be improved by prioritising the need to improve our capabilities and capacities through innovation, entrepreneurship, new technologies, investment, harnessing of scale, and cross-industry and cross-border collaborations of mutual benefit.

A national strategy, envisioning education as core to our 'economic prosperity, social advancement and international standing' requires a ten year horizon, and one which ensures development of our competitive advantages, capabilities and capacity to meet the realities of a changed world.

As **Chart 1** below shows there will be continued strong demand for mobile international students to undertake tertiary studies outside their home country, with predicted numbers climbing from 4.5 million to 8 million by 2025.

Chart 1



It is clear that on many fronts Australia has been a world leader in the development of the international education industry. However, we need to maintain our vigilance and act to guarantee that our current market position and reputational standing will be maintained.

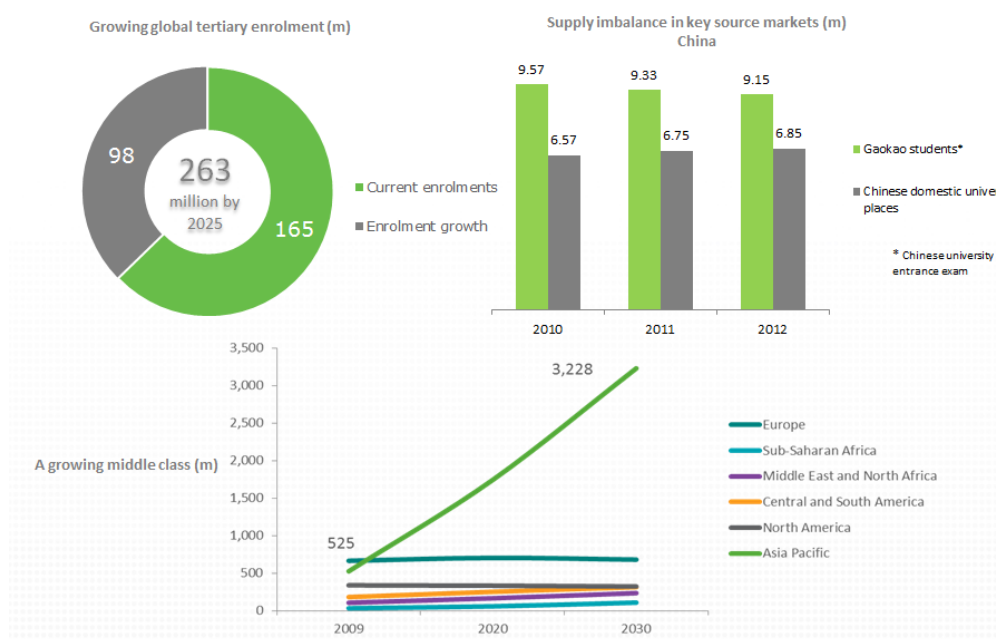
We are faced with increased competition not only from traditional English speaking destinations such as the USA and the UK, with their historical advantages, but also from other European countries, and emerging regional hubs in Asia, MENA and Latin America. Many of these countries have ambitious growth targets and may offer more relevant experiences for new generations of learners, particularly through strong intercultural experiences, quality infrastructure, new technologies, and government and private sector investment.

It is also clear that the huge growth in post-secondary education in the coming decades, and the concomitant market opportunities for Australia, will be in emerging and developing nations and will

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be delivered in-country. In these countries the growing global demographic of tertiary-aged young people demanding education will accelerate as the world urbanises and becomes more middle class. The global tertiary cohort is expected to reach 263 million by 2025, up by 100 million from current levels (**Chart 2**).

Chart 2



Source: Project Atlas 2014; OECD Education at a Glance, 2013; Hitting the sweet spot, Ernst & Young 2013

However, most developing and emerging countries have a gap between demand and supply for tertiary education, with domestic tertiary education infrastructure not equipped to meet growth trends. This is also the case with workplace training and re-skilling. Governments send their people overseas for education so that they can gain high level qualifications and skills, and better understand and engage with developed countries. However their largest investment is in internal structural and systemic change. The focus is on national human capital building strategies and targets, which increasingly involve utilising consortia and providers of external training and education from a range of sectors to develop a foundation of expertise on which to grow their economies and their international competitiveness. Governments and businesses are actively seeking partnerships and collaborations with educational providers who can equip their populations with the skills and know-how to build competitive economies and globally engaged societies.

There is a clear shift occurring in international education away from one-way international student recruitment, perceived as primarily benefitting the receiving country, to mutually beneficial¹, two-way long-term and trusted collaborations with emerging and developing countries that serve their national priorities. For example, a long history of delivering quality education outcomes in Australia for students from a number of countries in the Middle East was an important factor in Navitas English winning a major tender in 2013 with the Omani Ministry of Defence to provide English language training to prepare military cadets and service personnel to undertake trade, specialist,

¹ Nelson Mandela Bay Global Dialogue Declaration on the Future of Internationalisation of Higher Education <http://www.ieaa.org.au/documents/item/208>

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undergraduate and post-graduate engineering programs at the Sultanate’s newly established Military Technological College.

The countries, education systems, consortia and individual providers that demonstrate their commitment to building in-country human capital and capacity of emerging and developing nations will also be the countries that will benefit from increasing inward-bound student mobility.

In its report of July last year, *Building Australia’s Comparative Advantages*, the Business Council of Australia identified ‘priorities for structural reform to lift the competitiveness of sectors where Australia has a potential global advantage’.² ‘Delivering growth in the next decade will be a much harder task than it was in the previous two decades. It requires businesses and governments to take a different approach, to take more deliberate and purposeful steps to deal with a changing world. It is also an urgent task...’³

One sector where we currently have a comparative advantage is international education however the BCA report also noted that ‘our education and training system is not providing the right mix and quality of skills when needed to service a changing economy.’⁴

To create a world-class education system and ensure we are a preferred provider and partner in delivering international education to meet global demands we need to develop an avowedly global outlook and mindset, and invest heavily in offshore delivery through joint ventures, consortia and partnerships, technology, in-country campuses, and projects that support the governments of emerging and developing countries to build their human capital, knowledge and skills.

Questions for Stakeholders

Question 1

Question	Does the vision statement in the draft strategy represent Australia’s aspirations for international education?
Navitas Response	<p>Our vision for Australian international education should reflect Australia’s aspirations for the coming decades.</p> <p>The proposed statement, <i>Australian international education is a core element of Australia’s economic prosperity, social advancement and international standing</i>, focuses on the benefits to Australia however it does not capture our intent to benefit learners, wider communities and contribute to global knowledge, prosperity and sustainability. Education, innovative research, and knowledge sharing is at the heart of the world’s future prosperity and sustainability.</p> <p>Navitas would propose a vision statement such as:</p> <p><i>“Australian international education is valued for the benefits it delivers to individuals, communities and economies throughout the world. It is a core element of Australia’s prosperity, social advancement and global engagement.”</i></p>

² BCA, *Building Australia’s Comparative Advantages*, 2014, p.2

³ BCA, *Building Australia’s Comparative Advantages*, 2014, p.3

⁴ BCA, *Action Plan for Enduring Prosperity: Summary Report*, 2014, p.3.

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Question 2

Question	Are any significant goals for international education not adequately covered?
Navitas Response	<p>Goal 1: Creating a world-class education system</p> <p><i>To be globally competitive, Australia will continue to work to create an education⁵ system that stands out as the best in the world, with some of our institutions ranked among the very best.</i></p> <p>Navitas cautions against use of rhetoric such as ‘...create an education system that stands out as the best in the world...’ Such an absolute statement will always be open to debate, and may be perceived as hubris. An aspiration to be ‘amongst the best, with some of our institutions ranked amongst the very best’ is a worthy goal.</p> <p>In addition Navitas suggests broadening Goal 1 to “<i>To be globally competitive, Australia will continue to work to create an education system that stands out as amongst the best in the world, with some of our institutions ranked among the very best, and our education products and services sought by industry, governments and communities globally.</i>”</p> <p>With respect to the enabling strategies Navitas is of the view that specific strategies to stimulate and incubate innovation, particularly with respect to emerging technologies, and the development of entrepreneurship and intrapreneurship⁶ are required.</p> <p>Navitas also notes that many of the strategies are directed at the level of the individual institution. While we are strongly supportive of Australian institutions having ‘<i>the freedom to set their own strategic directions, build on their strengths and drive excellence</i>’ Navitas believes that the coming decade in internationalisation of education will increasingly see education, particularly offshore, delivered at scale through collaborations, consortia and partnerships.</p> <p>Strategic action 1.1: Embracing the freedom to achieve excellence</p> <p>We support the proposed actions to enhance autonomy, diversity, competition and student choice; in particular, the extension of CSPs to students in all undergraduate programs regulated by TEQSA, including the effective sub-degree pathways.</p> <p>Navitas has argued strongly that a more diverse and innovative education sector is necessary for Australia’s future. These reforms are vital if we aspire to have a population with the relevant skills, knowledge and abilities that prepare Australians for living, working and competing in a globally and digitally interconnected world; a world in which we continue to be a preferred destination for international students and an essential partner in global research and business collaborations. The reforms will stimulate diversity, competition, collaboration, innovation and efficiencies across the sector.</p>

⁵ This is a goal that sits within a national education strategy rather than a goal for a national international education strategy. It reflects an aspiration for a higher order strategy for Australian education.

⁶ Intrapreneur - a person who while remaining within a larger organisation uses entrepreneurial skills to develop a new product or line of business as a subsidiary of the organisation

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Strategic action 1.2: Investing in world-class research and research infrastructure

Navitas supports investment in research, including encouragement of industry and corporate partnerships and endorses the position taken by COPHE⁷ that competitive research funding should be open to all institutions and individuals who can demonstrate research excellence or potential, not only public universities. Several non-university higher education providers (NUHEPs) engage in fundamental research and PhD training, and deserve equitable opportunity for support to enhance national research output and international standing.

Strategic action 1.3: Supporting better information on quality performance

We endorse efforts to drive continuous quality improvement through better data collection, surveys and reports, including QILT, introduction of the Unique Student Identifier, OLT projects, and global comparator and benchmarking studies.

Strategic action 1.4: Provide quality assurance while reducing red tape

Navitas endorses the Government's commitment to a strong and highly effective quality assurance framework that is '*fit for purpose, measurable, achievable and nationally consistent*' and which gives effect to regulatory principles of necessity, risk, and proportionality.

We support the current ESOS Review and steps to remove unnecessary reporting while retaining appropriate regulation, quality assurance and consumer protection measures.

It is also critical that TEQSA and ASQA are adequately resourced to maintain confidence in the integrity and quality of Australian tertiary education.

Goal 2: Building on strong and emerging international partnerships

To raise Australia's profile as a world leader in education, we will build on our strong education and research partnerships and broaden engagement in international education.

Strategic action 2.1: Strengthening and diversifying institutional partnerships

Navitas would like to see this action broadened to *Strengthening and diversifying institutional and consortia partnerships and collaborations*.

Navitas believes that the coming decade in the internationalisation of education will increasingly see education, particularly offshore, delivered at scale through collaborations, consortia and partnerships.

Strategic action 2.2: Investing in high-quality international research collaborations

Navitas strongly supports this strategic action.

⁷ Council of Private Higher Education

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Strategic action 2.3: Building confidence through government-to-government engagement

This strategic action needs to more adequately represent the importance and impact of the role of the Commonwealth and State governments. For example, in supporting institutional capacity building in developing countries. Navitas suggests amending the action to *Building confidence and creating opportunities through government-to-government engagement*.

Strategic action 2.4: Broadening engagement to create new opportunities

In addition to strengthening our engagement with the Asia Pacific region we strongly support exploring opportunities in the MENA and LATAM regions, particularly those aligned to national human capital and capacity development projects.

Goal 3: Fostering an international outlook

Australia will foster an international outlook to better prepare Australian students and researchers for global engagement

Navitas believes that this is a critically important goal for the national strategy and for Australia's development as a nation. Navitas commends the Government for the initiatives and investment it has made to date, particularly in the New Colombo Plan. Global engagement generates significant individual and social benefits. We encourage initiatives that promote two-way student and academic staff mobility and exchange, including the New Colombo Plan, Endeavour awards and OS-HELP loans, but argue that such programs should be available to all students and staff, whether at public or private institutions. This is not the case at present.

Navitas proposes broadening the goal to *Australia will foster an international outlook to better prepare Australians - students, educational professionals, businesses and communities - for global engagement*

Strategic action 3.1: Preparing students for global engagement

Navitas stresses the importance of internationalising curricula across all education sectors and promoting the benefits of diversity and different cultural perspectives through positive community campaigns.

Strategic action 3.2: Rejuvenating language study

Navitas strongly endorses this action and commends the government for actively promoting languages other than English as foundation skills for participating in the global economy.

The proposal to engage pre-school age children through interactive, games based learning is particularly worth pursuing. The work of the Asia Education Foundation for schools (<http://www.asiaeducation.edu.au/curriculum/languages/details/language-chinese-curated-digital-resources>) is excellent. In addition to the initiatives proposed we suggest that consideration be given to supporting low-cost, technology enabled 'language taster' pilots at all levels of education.

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Goal 4: Attracting international talent

Attracting students to undertake study and research in Australia supports partnerships for the future and showcases the quality of Australia's education system.

Navitas suggests broadening **Goal 4** to include study at Australian institutions wherever based, i.e. *Attracting students to undertake study and research in Australia and at Australian institutions overseas supports partnerships for the future and showcases the quality of Australia's education system.*

The intention for **Goal 6** and *Strategic Action 6.2 (Enhancing opportunities to provide education services overseas)* may be to encompass attracting TNE students however it appears to be more focused on growth and new business opportunities rather than students as advocates for Australian international education. Alumni from Australian TNE operations are valuable advocates for Australian education.

Strategic action 4.1: Attracting students from around the world

The attitudes and perceptions of parents, source country communities, (social) media and governments all influence young learners in the decisions they make regarding where they choose to study. This generation, and future generations, of mobile students will increasingly be selective in choosing learning environments that respect their cultures, include diverse perspectives in the curricula, and where they feel equal members of the student body, and are welcomed into the local community.

Navitas believes one of the most effective ways to improve international students' engagement and social interaction in Australia would be to improve understanding in the Australian community of the social, national and economic benefits of international education. There remain perceptions that international students gain university places and access to rental accommodation to the detriment of domestic students. There is little understanding of the contributions international students make to Australia. Equally there seems to be minimal recognition that Australian communities have a part to play in making international students feel welcome in Australia, in fostering friendships and offering work opportunities.

Additionally if business were to better understand the investment and skilled labour opportunities available for them through engaging with the international education industry there may be more public private partnerships that provide solutions to issues of accommodation, transport, healthcare and work placements.

A coordinated government-funded communication campaign to educate Australian society and business about the benefits and realities of international education and students, and the value of internationalisation would contribute significantly to improving this situation.

Navitas believes there should be a balanced message to future students that education in Australia is accessible to all who have the commitment, ability and support to study here. Australia is a diverse and fair society open to providing opportunities for international students from all backgrounds.

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Strategic action 4.2: Marketing Australia as a high-quality education destination

Navitas proposes that the strategic action be broadened to include promoting Australian education services as well as Australia as a destination, for example: *Marketing Australian education services delivered in Australia or globally for their high-quality.*

Co-ordination between various government departments, different levels of government and industry stakeholders is critical, especially in the face of increasing and more sophisticated competition. The announced Australian International Education 2025 10-year market development strategy is to be highly commended. It will provide a strategic national framework for promoting and supporting Australian institutions in the export of education capabilities and capacity globally.

Agents play a vital role in helping international students manage the application process, find suitable education opportunities and prepare for living overseas. Agents have been used effectively for many years by Australian education providers. Agent relationships have developed into partnerships with mutual benefits for all parties, including a commitment to quality and standards. Without this commitment these long and successful relationships would not have been sustainable.

Navitas firmly believes that, in general, Australia has one of the best managed agent networks in the world. Providers work to ensure they maintain quality outcomes by using a number of tools including regular communication, adherence to a code of conduct, business conferences, ongoing training, and regional offices to help manage agent networks and relationships. An ongoing issue in relation to agents is the lack of understanding by Western countries of the valuable role education agents perform for students, parents and communities in many Asian cultures. A coordinated community and communication campaign would assist in overcoming misconceptions.

Strategic action 4.3: Building lasting connections with alumni

Navitas strongly supports the development of a whole-of-government alumni engagement strategy, which includes targeted alumni activities at overseas posts. Such a strategy should include alumni from TNE activities and those in-country students accessing Australian education online.

Goal 5: Ensuring a positive and rewarding student experience

To build on Australia's competitive advantages, we will continue to improve the quality of the educational and living experience for international students.

Navitas supports the focus on positive graduate outcomes for international students. We propose that **Goal 5** should also include improving the quality of career, employability skills and working experiences for international students. For example, greater collaboration with business and industry to support graduates obtaining employment in their field of study, either in Australia or internationally.

Navitas would like to see this goal broadened to *Australia will continue to improve the quality of the educational, living, career, employability and working experiences for international students.*

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In 2009 the Council of Australian Governments developed and adopted an International Students Strategy for Australia to *"support a high-quality experience for international students, in order to ensure a sustainable future for quality international education in Australia."* While a number of actions have been implemented the strategy itself needs refinement. Many of the actions were one-off and short-term rather than part of an integrated national framework. The national strategy for international education offers this opportunity.

Many international students and education providers are concerned that in the past Australia has accepted the economic return from international education without sufficiently investing in services for these students. Navitas recommends that a coordinated review be conducted into the availability of key services to international students across Australia including nationally consistent access to healthcare, affordable and safe housing, and public transport concessions. The lack of national consistency in the provision of such services can present a confusing and unwelcoming landscape to international students.

However the provision of adequate social infrastructure is an issue for the whole of Australia, across all demographics and is not specific to the inflows of international students. As part of the normal process of planning, governments should be anticipating medium and long-term infrastructure requirements arising from net population growth that reflects net migration as well as additional demands arising from tourism and international student numbers. Navitas would recommend that Commonwealth and State governments' investment in infrastructure include input from the AIE 10-year market development strategy and its identified priorities.

Strategic action 5.1: Maintaining competitive visa and strong consumer protections

Navitas endorses the work of Government in ensuring strong consumer protections and reviewing of our visa regime to maintain its integrity while improving competitiveness. Australia has led globally in regulation of international education and consumer protection through the ESOS Act 2000, and subsequent developments. We anticipate further improvements from the current reviews of student visas and the ESOS framework.

Navitas supports strong regulatory enforcement where there is evidence of systemic rorting of the student visa system, however we would caution against sudden changes to visa settings and charges without considering input from the ministerially led coordinating council and the international education sector. The Government's coordinating council is a forum for situating policy levers within a nationally consistent approach that will grow our most important services export. As an example recent actions by the UKVI in the UK have negatively impacted international students' perceptions of the UK as a study destination and resulted in enrolment declines.

In Australia the costs of student visas were suddenly increased in 2013, and are considerably higher than competitor countries, apart from the UK in some instances. This needs to be redressed, not only because of the cost impact on students and sponsors, but also for the confused signal of welcome it sends and for the impact on bilateral relations, for example students sponsored by other governments or agencies.

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Strategic action 5.2: Identifying work experience opportunities

Opportunities for work integrated learning, on the job experience and post-graduation work opportunities need to be actively promoted, with appropriate safeguards to prevent exploitation. The introduction of post-study work rights (PSWR) has been a very positive and attractive option for international students, including those who intend to return home, or join a globally mobile workforce. Some also see PSWR as a pathway to employer sponsorship for skilled migration, consistent with current government policy.

In spite of recent promotional efforts by the government, we believe that the opportunities for employers to attract high quality international graduates as employees are not well understood, or utilised. This can result in employers being reluctant to invest in employees who are not permanent residents. More still needs to be done to promote the advantages of engaging international student graduates. While there are some excellent individual projects, a co-ordinated approach is needed with industry bodies, business councils and domestic and international business communities.

The recent International Education Association of Australia (IEAA) national symposium on Employability (<https://www.ieaa.org.au/professional-development/event/ieaa-employability-symposium>) was a highly attended forum for bringing together all players (education institutions, students, industry groups and government representatives) to address barriers and explore strategies to enhance the employability prospects of Australia's international students. The draft best practice guides for students, employers and education institutions that were put out for comment are an excellent resource for improving outcomes for students, informing employers and promoting best practices in this area.

We need to be aware that a backlash from disappointed graduates is possible if they are not able to access meaningful post-study work experiences, given that it was a significant factor for many in their decision to study in Australia.

Navitas proposes the addition of a *Strategic Action: **Enhancing employment outcomes for graduates with international experience and networks.***

Strategic action 5.3: Improving English language proficiency

Australia's expertise and quality reputation in the teaching of English language programs for international students, and migrants and refugees, is recognised globally. For over three decades Australian English language providers have excelled in English for Academic Preparation courses that ensure international students have the English competence and academic study skills to commence their tertiary studies. However, the development of English language competence pre- study, during study and during employment is little understood outside the sector. It has become easier to require higher scores on an English language proficiency test and attribute communication difficulties that occur in tertiary courses, during graduate employment interviews, and in workplaces as 'poor English' without a much more nuanced and informed exploration of what is actually occurring.

Students and providers need to implement strategies and programs that continue to develop English proficiency and communication skills throughout the course of study, not merely meet a minimum entry requirement. This should continue to be a focus for

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students, providers and the regulatory bodies.

IEAA has again been instrumental in initiating two national symposia⁸ to critically examine the efficacy of Australian policy and practice in this area and to suggest actions for improvements in light of the emerging requirements facing institutions, students, employers and professional groups. Government has also funded an excellent report by the Centre for Study of Higher Education that deserves wide promulgation to, and take-up by, students, education institutions and employers⁹.

Strategic action 5.4: Improving access to public transport and health services

Navitas acknowledges and commends the work of the Council of International Students Australia (www.cisa.edu.au) for work they have done to raise issues that are negatively impacting the experiences of international students and the initiatives and collaborations they have taken in engaging with governments, providers and the community to improve access to public transports, health services and safe and affordable accommodation for students.

Transport concessions are a significant touchstone and an important signal of welcome for international students. Navitas supports plans by the two largest states, NSW and Victoria to review their current practices where international students are only eligible for partial concessions and, in the NSW case, do not have access to the most common transport tickets. Concessions on a par with domestic students would not only be equitable, but might also assist in alleviating housing pressures and safety concerns where students travel at night for part-time work.

Strategic action 5.5: Improving access to suitable and affordable accommodation

Australia is already seen as an expensive destination for tuition fees and living costs, even with the recent decline in exchange rates. The lack of accessible and affordable low cost housing and the attendant political issues in the inner cities is a major impediment to significant growth in onshore international students. Promotion of regions has some attraction, but many students opt for the major cities because of family and cultural networks, and potential work opportunities.

Increased purpose-built student accommodation is a critical measure however it is only one element of student accommodation issues¹⁰.

As the draft strategy has noted *'a recent census of purpose-built university student accommodation (supported by the Australian Government) found that approximately 13 per cent of international university students were staying in such purpose-built accommodation, while the remainder found other options in Australia's private rental market.'* However the draft national strategy does not include strategic actions or measures related to the private-rental market, planning laws or investment.

The successful provision of affordable, high quality student accommodation will require a multifaceted approach by education providers, federal, state and local governments and investors (Australian and international). Specific areas that require addressing

⁸ <https://www.ieaa.org.au/research-projects/english-language-competence>

⁹ Arkoudis, S. et al 2014 **English Language Proficiency and Employability Framework for Australian higher education institutions** CSHE for Australian Government Department of Education

¹⁰ The forthcoming IEAA national symposium on Student Accommodation will provide a forum on current issues and solutions to improving access and address issues of planning and investment. <http://www.ieaa.org.au/professional-development/event/ieaa-accommodation-symposium>

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include:

- Supporting low income housing initiatives specifically in locations proximate to campus locations;
- Reviewing and implementing planning regulations that support the specific requirements of student accommodation property developments;
- Reviewing relevant tenancy acts to optimise the private supply of student accommodation rentals to an agreed standard for students;
- Ensuring State Government policies are supportive of, and do not differentiate against, the interest of international students;
- Ensuring the identification and enforcement of student accommodation regulation has as its underlying objective the support of students and the international student market; and
- Developing an industry-based system of accreditation for student accommodation supported by access to relevant information for international and domestic students and encompassing an associated complaint and follow-up mechanism.

Strategic action 5.6: Increasing community engagement

Navitas supports all actions to encourage community engagement, and recognition of the economic and social contributions of international students. The request for more interaction with local students is a constant theme in international student surveys. Navitas believes one of the most effective ways to improve international students' engagement and social interaction in Australia would be to improve understanding in the community of the social, national and economic benefits of international education.

There remain misperceptions that international students gain university places and rental accommodation to the detriment of domestic students. In addition, there is little understanding of the contribution international students make to Australia. Equally there seems to be minimal recognition that Australian communities have a part to play in making international students feel welcome in Australia, in fostering friendships and offering work opportunities.

A coordinated government funded communication campaign to educate Australian society about the benefits and realities of international education and international students, and the value of internationalisation would contribute significantly to improving this situation.

Goal 6: Embracing opportunities to grow international education

Australia will grow international education services, by embracing new technologies and responding to demand for offshore education and training services.

While the draft national strategy is very strong on improving current capabilities and building on areas of excellence and strength, Navitas believes that it needs to give more weight to the profound and irreversible changes occurring, and that will occur, in the delivery of education (both domestic and international) over the coming decade.

These changes are being driven by developing and emerging economies, young and ageing populations, geo-political forces, technological advances, and resource, health and environmental issues. Responses to virtually all of these factors require different mindsets, capabilities, and collaborations. The draft strategy and associated strategic

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actions do not sufficiently prioritise the need to improve our capabilities and capacities through innovation, entrepreneurship, new technologies, investment, harnessing of scale, and cross-industry and cross-border collaborations of mutual benefit.

Strategic action 6.1: Leading good practice in new modes of delivery, including online

All workers in this century require digital skills. Many will be required to interact, solve problems, learn, research, collaborate and be productive in online environments throughout their career. Australian education, however 'delivered', must prepare students for this future.

The draft strategy distinguishes between 'online' and 'on-campus' learning. However, we need to be thinking of technology as an inherent part of the learning process in tertiary education rather than separately as differing 'modes of delivery'. To be competitive on the world stage, Australian education needs to be flexible, and acknowledge the spectrum of technology use, as is appropriate for the type and level of education.

Digital technologies are critical in enhancing the student experience in 'classrooms', during the student journey from pre-departure to graduation and beyond, as alumni and globally mobile workers. 'International' students of the future are likely to want a truly global experience where, for example, their course blends interactive online learning with a range of immersive in-country on-campus experiences, with work placement as part of the mix. This requires collaboration between educational organisations, industry groups, employers and governments across different countries.

While continued research and support into good practice in new 'modes of delivery' and 'online' is to be supported, new digital business models in education have the potential to disrupt the sector and leave Australian education at a disadvantage. Digital technologies are driving systemic changes to educational delivery, business and operating models, and engagement with learners. These changes will open new markets, for example in niche industry training, professional development and postgraduate education.

We need to be looking outside the sector to other industries and their experience of digital disruption and be collaborating with the technology industry so as to prepare Australian education for a much more global, connected and technology integrated future. Australia needs to be a generator of innovative delivery methods and collaborations with 'non-traditional' parties who are now entering the education space. Currently we are late entrants to changes occurring in the digital space. While there are pockets of innovation, adoption and adaption Australian education is ill-prepared for the future of education in a digital world.

Given the above points, there is much work to be done to develop the capabilities of Australian academics, teachers and education providers in the design, delivery and assessment of learning within new technology platforms and business models, in collaboration with partners globally.

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Strategic action 6.2: Enhancing opportunities to provide education services overseas

As discussed earlier, there are enormous opportunities for Australia to grow the provision of high quality education to international students in Australia and to serve the needs of emerging and developing countries. The draft national strategy and the associated 10-year market development strategy are timely and critical for the coming decade. At this point in time Australia could be better placed to leverage its past successes and participate in the huge surge in tertiary education opportunities overseas. We need to invest more in infrastructure, innovation, and new models of learning, in particular digital technologies, and new business models.

In fact over the past year, starkly demonstrated by the domestic higher education and vocational education debates, we are an increasingly polarised post-secondary sector, focused on protecting our own patch, with a deep public/private divide. We have become inwardly focused, poorly connected beyond the education sector, and increasingly competitive amongst ourselves. This insularity has worked against collaborative and innovative partnerships, big picture thinking and the development of a global mindset.

Overseas countries are looking for mutually beneficial relationships and partnerships, two-way mobility, and collaboration across cultures to improve their own education systems. Their focus is on developing their people, the vast majority of whom will not travel overseas for an education. These countries will increasingly look to education institutions and consortia which deliver gains to all parties and invest time and money in human capital building. An internationalised education that delivers with a global mindset will be valued however institutions that only recruit students to study in Western countries will not be seen as preferred partners.

Australia has a track record of delivering high quality education that meets learners' needs. However we need to adapt to a new 'who', 'why', 'how', 'when' and 'where' to stay relevant to today's and tomorrow's consumers.

Strategic action 6.3: Understanding the opportunities

It is critical that Australia has a national strategy for the growth of our international (and domestic) education industry and Navitas commends the government for initiating such a strategy. Government can further assist through improved comprehensive data gathering and analysis, surveys, ongoing competitor analysis and more importantly, identification of growth opportunities offshore. AIE 2025 will provide the necessary framework for identifying, prioritising and supporting growth opportunities.

Although improving community engagement with international education and students is a specific strategic action it could be better represented in the goal statements. There is significant need for greater understanding of the substantial benefits that international education and international students bring to Australia. We need to build community support and advocacy for continued investment.

While Australia's ministerially led coordinating council will focus on aligning and harnessing different departments and policies within a strategic framework for international education Navitas believes streamlining government agency and ministerial involvement could be better addressed in the goal statements, through a strategic action and in the measures of success so that there are clearer lines of responsibility at federal and state levels.

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Question 3

Question	Can you identify the strategic actions which best support your goals for international education?
Navitas Response	<p>Consultations across Navitas have concluded that all the strategic actions have value as enablers of the Strategic Goals. However, many of the strategic actions focus on inputs or broad statements of intent. There needs to be a far stronger focus on implementation, action and measurement.</p> <p>In addition, strategic actions are in a number of cases too specific or too broad, difficult to measure, or in some cases absent.</p> <p>For example:</p> <ul style="list-style-type: none"> • In addition to research and research infrastructure investment there is a need to attract significant investment in other infrastructure development, to fund innovation and incubation hubs. • Increased purpose-built student accommodation is a critical measure however it is only one element of student accommodation issues. There are no strategic actions or measures related to the private-rental market, planning laws or investment.

Question 4

Question	What are the best measures of success?
Navitas Response	<p>All the proposed measures of success would be enhanced by meeting Specific, Measurable, Achievable, Relevant and Timely criteria. We need to focus on outcomes and demonstrable results in improved performance.</p> <p>To create an education system that is valued amongst the best in the world we will need to demonstrate:</p> <ul style="list-style-type: none"> • Improved education performance against credible international benchmarks • Greater and more informed student choice • Improved study, living and career experiences of students receiving an Australian education • Improved employer satisfaction with the English language competence of international student graduates • Increased levels of alumni satisfaction, engagement and ongoing connection with Australia. • Growth in the international student market share overall and source-market market share • The Australian community is a 'net promoter' of international education and

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international students.

- Australian institutions, and their service offerings, increasingly included as partners and consortia members in major human capital and capacity building projects in emerging and developing countries.

Question 5

Question	What are the case studies that best illustrate Australia’s success? Please provide examples.
Navitas Response	<ul style="list-style-type: none"> • Student journeys, including pre-sessional ELICOS, transition to a university pathway college, successful graduation from university, transition to employment, graduates, students in the workplace and students who have returned home, and those who have become citizens. • Communities, especially local, regional and rural communities, and businesses/industries promoting the benefits international students have brought to them and the value of diverse friendships. • Domestic and international student stories of friendships, new experiences and learnings. • How the regulatory framework and consumer protection mechanisms are world class. • How outbound mobility and international engagement of domestic students is leading to better jobs and better opportunities for Australian domestic students. • Success of Australian education partnerships and collaborations in major human capital and capacity building projects undertaken by governments and business in emerging and developing countries. • Innovations in use of technologies, new business and learning models.

Question 6

Question	What would you like to see progressed as a priority in the first year?
Navitas Response	<ul style="list-style-type: none"> • Two engagement campaigns. <ul style="list-style-type: none"> • Firstly, one to raise the profile of Australia internationally as a welcoming, high quality study destination. Specifically international students need to know that Australia, from the Prime Minister to the person on the street, wants to welcome them to our country and will value them. The campaign should also raise awareness that Australia is a leading supporter and contributor to the internationalisation of education, as well as the role international education plays in developing economies and societies, both in Australia and globally. • And secondly, a ‘champion <u>all</u> students’ campaign where Australian communities become advocates for the benefits international and

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	<p>domestic students bring to their towns, regions and cities.</p> <ul style="list-style-type: none"> • Extend tuition subsidies to all accredited undergraduate courses at private universities and non-university higher education institutions registered with the Tertiary Education Quality and Standards Agency. • Ensure that the Tertiary Education Quality and Standards Agency, the Australian Skills Quality Authority and the Australian Curriculum, Assessment and Reporting Authority are sufficiently resourced to effectively enforce quality provision and that qualifications meet nationally consistent quality standards across all areas of our education system. • Reduce the reporting and compliance burden on high quality international education institutions and achieve better alignment with legislation that supports Australia’s quality assurance framework for education. • Launch the AIE 2025 10-year market development strategy. • The Australian Government to enter into partnership arrangements with other governments for productive working relationships, for example, the recent renewal of the long-standing Australia-China Arrangement on Higher Education Qualifications Recognition.
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Comments

Question	Are there any other comments that you think are relevant?
Navitas Response	<p>This is a very comprehensive draft strategy for international education, which addresses the growth and development of Australia’s international education sector, and places the student experience at the heart of the strategy.</p> <p>As a national long-term strategy there are a number of areas that need more prominence, primarily:</p> <ul style="list-style-type: none"> • Developing competence and expertise in digital delivery and the use of technologies • Entrepreneurial skills development, particularly given issues of youth unemployment in many source countries • Innovation and incubation hubs • Infrastructure investment • Offshore delivery <p>As a general statement the majority of goals are broad facilitation statements; there needs to be more focus on implementation and measurement. The challenge is to find the mechanism to convert these goals and strategies into actions with clearer outcomes, more defined success measures and accountabilities. In bringing together</p>

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these arrangements consideration should be given to clearly articulating accountability for the final strategy - its implementation, monitoring and review.

Navitas would welcome the opportunity to contribute to advancing these positive proposals.

Submitted by Navitas Limited and authorised by Navitas Group CEO, Rod Jones.

Level 8, Brookfield Place,
125 St Georges Terrace,
Perth WA 6000 Australia

Contact: Helen Zimmerman, Government & Stakeholder Relations
(helen.zimmerman@navitas.com)

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