



Independent Schools
Council of Australia

Discussion Paper for the Development of an International Education Strategy for Australia

Submission by
The Independent Schools Council of Australia (ISCA)

Introduction: About ISCA

The Independent Schools Council of Australia (ISCA) is the peak national body covering the independent schools sector. It comprises the eight State and Territory Associations of Independent Schools. Through these Associations, ISCA represents a sector with nearly 1,090 schools and 550,000 students, accounting for nearly 16 per cent of Australian school enrolments.

Independent schools are a diverse group of non-government schools serving a range of different communities. Many independent schools provide a religious or values-based education. Others promote a particular educational philosophy or interpretation of mainstream education. Independent schools include:

- *Schools affiliated with larger and smaller Christian denominations for example, Anglican, Catholic, Greek Orthodox, Lutheran, Uniting Church, Seventh Day Adventist and Presbyterian schools*
- *Non-denominational Christian schools*
- *Islamic schools*
- *Jewish schools*
- *Montessori schools*
- *Rudolf Steiner schools*
- *Schools constituted under specific Acts of Parliament, such as grammar schools in some states*
- *Community schools*
- *Indigenous community schools*
- *Schools that specialise in meeting the needs of students with disabilities*
- *Schools that cater for students at severe educational risk due to a range of social/emotional/behavioural and other risk factors.*

Independent schools are not-for-profit institutions founded by religious or other groups in the community and are registered with the relevant state or territory education authority. Most independent schools are set up and governed independently on an individual school basis. However, some independent schools with common aims and educational philosophies are governed and administered as systems, for example the Lutheran systems. Systemic schools account for 16 per cent of schools in the independent sector. Independent Catholic schools are a significant part of the sector, accounting for 10 per cent of the independent sector's enrolments.

The Independent Schools Council of Australia (ISCA) welcomes the opportunity to make a submission on the *Development of and International Education Strategy for Australia* to the International Education Advisory Council.

In this submission ISCA will:

- advocate for an international education vision and strategy for Australia that is visionary and inclusive, and that clearly identifies a high quality system of education as a central pillar of Australian society and of Australia's engagement internationally
- draw attention to the contribution of non-government schools to education in Australia, and to the challenges that confront non-government schools in international engagement, and
- seek affirmation from the Council that members will consult widely with each education sector to ensure a deep understanding of sectoral differences when proposing changes in order to achieve consistency of implementation of new policy directions across agencies and to avoid unintended consequences.

ISCA believes to successfully develop an international education vision and strategy capable of serving Australia over the next five years and beyond it is critical to:

1. **Acknowledge education as a central pillar of Australian society and of Australian engagement internationally;**
2. **Align the goals of an international education strategy with other national education goals;**
3. **Take a multi-layered approach to respond to “industry” challenges, and**
4. **Understand and account for sectoral differences.**

1. Acknowledging education as a central pillar of Australian society and of Australian engagement internationally

Australian education has been reviewed at all levels and is being reformed at an unprecedented rate:

- Early Childhood: new national standards, regulation and framework
- Schooling: Australian Curriculum and Gonski Review
- Tertiary Education: Bradley Review and national regulators for Higher Education and VET
- International Education: Baird Review of ESOS and Knight Review of the Student Visa Program.

The extent of the government's reform agenda recognises that education is central to Australia's national interests and is critical to both our national development and international standing.

It is therefore important that “Education” remains an encompassing and central tenet in a development of an “International Education” Vision and Strategy for Australia, and that the Council's opportunity to in fact be visionary is neither wasted, nor narrowly focussed in scope.

The proposed vision statement:

Australia is recognised, both regionally and around the globe, as a world class provider of education and training, a partner of choice for educational collaboration, and a country that openly welcomes international students and helps them achieve their goals.

does not explicitly refer to “International Education” and does not adequately reflect Australia’s desired positioning in the next stage of “internationalisation” of education, described in the *Discussion Paper* as being “characterised by deep cooperation and collaboration, focusing on achieving mutual benefits for all participants.”¹

ISCA supports the broader and more inclusive vision statement proposed by IEAA in 2011:

*International education is valued for the benefits it provides to communities and individuals in Australia and overseas. It underpins Australia’s national prosperity and social advancement and helps build Australia’s international standing and our place in the world.*²

ISCA believes the key to developing a successful International Education Strategy lies in “achieving mutual benefits for all participants” within an education system that delivers high quality outcomes, experiences and opportunities for *all* students, regardless of nationality or age.

Ensuring there are Ministerial responsibilities for International Education within a single portfolio would also go some way to acknowledging the importance of international education to Australia’s national interests.

2. Aligning the goals of an international education strategy with other national education goals

ISCA has previously advocated for an approach to international education which supports cross-sector initiatives and reforms at government level that:

- are in Australia’s national interests
- ensure Australia is competitive in terms of global mobility
- contribute to perceptions of Australia as being an open, democratic and welcoming society, with an efficient and unbiased bureaucracy, and
- encourage schools to engage in international education programs, rather than act as a disincentive to do this.³

¹ *Discussion Paper for the Development of an International Education Strategy for Australia* April 2012, p.5

² IEAA *A Strategic Vision for International Education in Australia 2011*

³ ISCA *Submission to the Strategic Review of the Student Visa Program*

In this submission, ISCA would like to add:

- align the goals of an international education strategy with those of the “*Melbourne Declaration of Educational Goals for Young Australians*”⁴ and the Australian National Curriculum.

Such an approach would recognise education as pivotal to meeting challenges identified in the *Melbourne Declaration*, including:

- the rapid increase of global integration and international mobility
- the growth of India, China and other Asian nations and the increase of their influence on the world
- the demands globalisation and technological change are placing on education and skill development in Australia and the nature of jobs available to young Australians
- the need to respond to complex environmental, social and economic pressures that extend beyond national borders and that require countries to work together in new ways
- the rapidly changing ways in which people share, use develop and process information and technology.

The *Declaration* was made by all Ministers of Education in Australia, and should, in ISCA’s view, make a major contribution to an international education strategy, along with other defining national statements which underpin Australia’s national interests and aspirations.

The policy frameworks for schooling in Australia, including the *Melbourne Declaration on Educational Goals for Young Australians*⁵ and *The National Curriculum*,⁶ clearly articulate the role of education in shaping future citizens. For example:

*Intercultural understanding is an essential part of living with others in the diverse world of the twenty-first century. It assists young people to become responsible local and global citizens, equipped through their education for living and working together in an interconnected world.*⁷

Active and informed citizens. . . .

- are able to relate to and communicate across cultures, especially the cultures and countries of Asia
- work for the common good, in particular sustaining and improving natural and social environments
- are responsible global and local citizens.⁸

⁴ MCEECDYA, 2008

⁵ MCEECDYA, 2008

⁶ <http://www.australiancurriculum.edu.au/>

⁷ Introduction to the General Capability “Intercultural Understanding”: <http://www.australiancurriculum.edu.au/GeneralCapabilities/Intercultural-understanding/Introduction/Introduction>, downloaded 07/07/2012

⁸ *Melbourne Declaration on Educational Goals for Young Australians* : “Goal 2: All young Australians become successful learners, confident and creative individuals, and active and informed citizens” http://www.mceecdya.edu.au/mceecdya/melbourne_declaration,25979.html downloaded 07/07/2012

School sector engagement internationally includes, but is not limited to:

- Enrolment of overseas students in short / long term, formal / informal education programs
- Sister school relationships focussing on language and cultural exchanges
- Inbound and outbound visit and exchange programs for staff and/or students in other areas, e.g., Music, Sports, Technology, Leadership, Service Learning
- School Study Tours
- Participation in international conferences for professional development and other purposes
- Support for Asia Education Foundation (AEF) events and activities
- Sponsorship of deserving students and fundraising for international causes.

ISCA contends that the school sector, with a long history of international engagement, is well placed to participate in and contribute to developing an International Education Strategy in Australia’s “*third phase of its international education, or rather the internationalisation of Australian education*”⁹.

3. Taking a multi-layered approach to respond to “industry” challenges

As with other sectors, non-government schools have been significantly affected by the decline in international student enrolments. This is discussed in more detail, below.

The reasons for the decline in international student enrolments are well documented¹⁰. It is important that the Council seeks to address the decline in international student numbers for all of the reasons outlined on p. 13 of the *Discussion Paper*, not just for economic ones. Likewise it is important that the Council takes a broad view in envisioning “International Education in Australia” and in creating a platform for a wide range of endeavours in this area.

A multi-layered approach to respond to “industry” challenges might include:

- Regularly reviewing regulatory frameworks with a view to reducing compliance burden and costs (non-government schools have not seen any decrease in compliance requirements as a result of recent ESOS reforms)
- Identifying key domains and projects for expert working groups, for example:
 - Use of data (for multiple purposes)
 - Local community education and engagement (including working with municipal councils on infrastructure issues such as housing and transport)
 - Promotion of opportunities in regional areas of Australia

⁹ *Discussion Paper for the Development of an International Education Strategy for Australia* April 2012, p.5

¹⁰ *Discussion Paper for the Development of an International Education Strategy for Australia* April 2012, p.4

- Cross-agency networking and collaboration (for example, with Tourism, Business Councils, and other Industries)
- Media management (including monitoring and responding to international and social networking items).
- Understanding and responding to sectoral differences and capabilities.

4. Understanding and accounting for sectoral differences

The profile of the non-government school sector differs quite substantially from other sectors. Approximately 42% of all overseas students enrolled in the school sector in Australia attend independent schools.

In 2011 there were nearly 7,500 overseas students enrolled at 360 independent schools¹¹. ISCA estimates between 30-40% of all CRICOS registered providers in Australia are independent schools that are individually registered and individually responsible for meeting compliance requirements. Some schools also have ELICOS centres attached to their institutions which may also be separately registered on CRICOS.

By contrast, state departments of education (enrolling approximately 54% of overseas school students overall) hold single provider registrations covering any number of state schools enrolling overseas students within a state.

Overseas student enrolments in independent schools vary from 1 to just over 250 overseas students. The median number of overseas students at an independent school is 9 students.

The IEAC, in framing the Discussion paper themes, has commented:

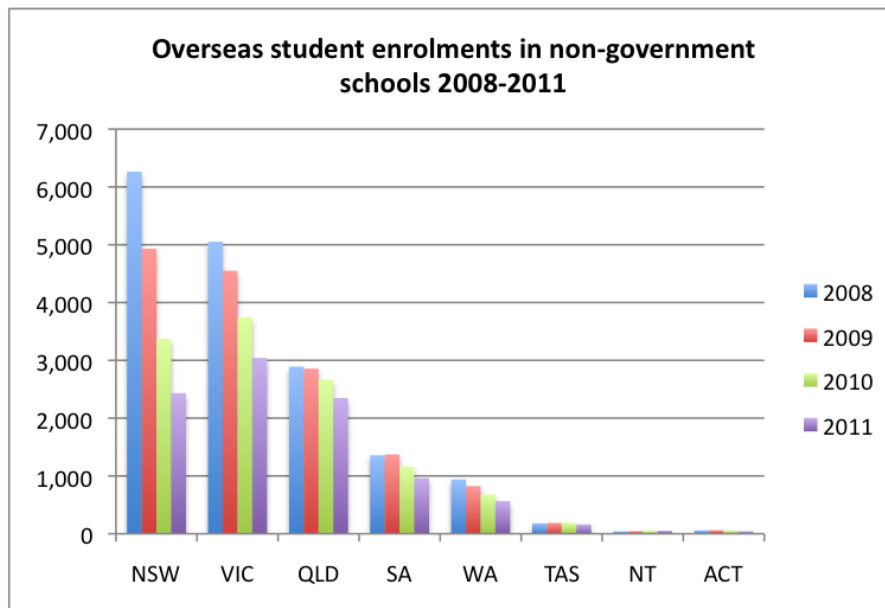
*It is important to recognise that a variety of business models operate in the education sector and that enrolment profiles differ across institutions and sectors. While schools and TAFE's may have much smaller enrolment numbers than private VET and Higher Education, it is important to recognise that even small enrolment numbers can be critical to the business models of schools and TAFE's.*¹²

Since 2008, declines in overseas student enrolments in the school sector have been most significant in non-government schools in New South Wales and Victoria, the states most affected by adverse publicity about “private” education providers in the media overseas in 2009. Declines in other states have also been experienced 2009-2011, albeit to a lesser extent, as seen in Fig. 1¹³, below.

¹¹ Based on DEEWR 2011 Non-government School Census Data

¹² *Discussion Paper for the Development of an International Education Strategy for Australia* April 2012, p.18

¹³ Compiled from AEI 2011 International Student Data



Apart from the impact of adverse media coverage overseas on the non-government schools sector, other factors commonly reported as influencing the rapid decline of overseas school student enrolments have been the continuing strength of the Australian dollar, and the relative ease of being granted visas to study in competitor countries.

However, it is important to keep in mind, for the vast majority of non-government schools, overseas students do not determine a school's financial viability. Rather, the motivation for many non-government schools to enrol overseas students is to provide a much valued international element and diversity to school populations. It is important for these reasons, therefore, that the ability to do this remains a viable proposition for this sector, and that the benefits of enrolling even relatively small numbers of overseas students are not placed under threat by the time, effort and costs associated with meeting compliance obligations and costs associated with CRICOS registration.

ISCA is concerned that recent reforms aimed at benefitting the international education "industry" as a whole by creating simpler, stronger regulatory frameworks and reducing overall compliance burden and costs are actually having the opposite effect within the non-government schools sector, and that these will act as disincentives for a large number of CRICOS registered non-government schools wishing to enrol comparatively small numbers of overseas students.

Rather than benefitting from a reduction in annual registration fees, the majority of CRICOS registered non-government schools have been liable for increased regulatory charges in 2012; the introduction of the new Tuition Protection Service (TPS) will further increase the compliance burden and costs for non-government schools, while the Entry to Market Fee will discourage smaller schools in particular from becoming CRICOS registered.

Since August 2009, ISCA has provided nine submissions to government departments or parliamentary committees in relation to international education policies and issues. The thrust of ISCA's submissions has been to advocate for a regulatory environment which is transparent and which recognises the low risk nature of non-government schools, and a consultative approach to industry reform and development.

While supporting a cross-sectoral approach to International Education in Australia, ISCA nonetheless urges Council members to consult widely with individual education sectors to ensure there is a deep understanding of sectoral differences when proposing changes to achieve consistency of implementation of new policy directions across agencies and to avoid unintended consequences.

Please also see attached responses to the Discussion Paper Questions below.

Barry Wallett
(Acting) Executive Director

Independent Schools Council of Australia
8 June 2012

1. How can we draw from past experience in preparing an international education vision and strategy that takes Australia forward in a rapidly changing global environment?

A particular example of the complex interconnection of relationships and mutual benefits flowing from historical engagement in international education programs can be seen in the current increase in international student enrolments from Papua New Guinea into the school sector, at a time when enrolments are decreasing from most other countries.

As with the Colombo Plan in higher education, the AusAID secondary school scholarship scheme from 1986-1996, which provided funding for some 2000 secondary school placements for students from PNG, was valued for bringing diversity to schools campuses and communities "from Lismore in northern NSW to Darwin in the Top End".¹⁵

Today, families in Papua New Guinea who benefitted from the school sector scholarships in the '80's and '90's are among those who are sending their children to Australia to similarly benefit from a schooling experience.

It may be possible for the Committee to explore how use of scholarships in the school sector can again contribute to Australia's aid program, particularly within our geographic region.

Today, an international vision should encapsulate broader Australia-wide objectives that could include:

- Nurturing the complementary relationship between social policy and economic prosperity;
- Developing a vibrant, knowledge-based economy and stimulating enterprise and productivity;
- Re-inventing and repositioning our current social policies;
- Deepening capabilities, achieving higher social and economic participation rates and more successfully handling diversity, particularly within immigration, refugee and overseas student programs.

An international educational vision should be created by educational practitioners as well as policy makers: people who understand what students need, and how schools and post compulsory educational institutions can work effectively under current funding arrangements to move the vision to reality.

An international education strategy clearly needs to be linked with current global economic and social trends and relationships between Asian countries and Australia.

¹⁴ [https://aei.gov.au/IEAC2/Consultation\(IEAC\)/Pages/Consultation.aspx](https://aei.gov.au/IEAC2/Consultation(IEAC)/Pages/Consultation.aspx)

¹⁵ Christopher Zinn, *Sydney Morning Herald*, 6 September, 1996, quoted in *Making a Difference: Australian International Education*. 2011, p. 264.

2. Which emerging issues do you believe will impact on international education in Australia?

There are a number of issues that already impact on international education in Australian Schools.

- Increasing regulatory burden and compliance costs (for non-government schools in particular).
- Issues of capacity and infrastructure, supply and demand – with implications for business planning, particularly in times of erratic economic cycles.
- The Australian Dollar. Whilst this continues to remain strong in the global economy, the actual cost for a family from overseas to educate their child at an Australian school increases accordingly.
- Reputational damage when providers close without notice.
- Competitor country recruitment activities, particularly USA, Canada and New Zealand.
- The perception of Australia being a racist country.
- The need to educate the Australian public about the importance and benefits of international education – in the case of inbound as well as outbound students.

ISCA also sees the following as emerging issues:

- From ISCA’s submission *Australia in the Asian Century*:¹⁶
 - It is important that schools are appropriately resourced to implement national policy initiatives in order for programs to be co-ordinated, sustainable and ongoing.
 - National and international relationships are key to building the capacity of school communities to prepare students for the Asian Century.
 - National policy settings and processes must recognise the diverse and autonomous nature of the independent schools sector.
- The pace at which internationalisation of education is being driven by technology and economic imperatives around the world – at all levels of education, from early childhood onwards.
- The global portability and recognition of Australian educational qualifications – for Australian as well as international students.

3. Does the vision reflect Australia’s aspirations for international education? If not, how can it be strengthened?

Please see comments on “vision”, above. ISCA supports a broader and more inclusive vision statement; one which includes mention of “international education”.

4. How can the quality of education provided by Australian institutions to international students be effectively monitored?

For the school sector, CRICOS registration and monitoring, as well as school accreditation, remains within the purview of the states and territories.

In Western Australia, the Department of Education Services (DES), following a period of

¹⁶ *Australia in the Asian Century* Submission by The Independent Schools Council of Australia (ISCA) to Australia in the Asian Century Task Force, 26 February 2012.

intensive consultation and debate, has amalgamated what was originally two separate registration processes into one streamlined and effective process for 2012. This ensures that both Federal and State legislation and the CRICOS requirements are monitored to exacting standards.

ISCA supports

- a) a reduction in the duplication of regulatory processes, and
- b) adoption of a transparent approach to risk profiling

in order to free up resources for monitoring the activities of high-risk providers.

Monitoring of quality can also take place through tracking of course completion rates, graduate outcomes and student satisfaction surveys, pathways statistics, etc.

5. How well do offshore agents perform in recruiting and preparing students to study in Australia? Are the current arrangements with agents appropriate?

Non-government schools probably use agents less than other sectors. Many do not use agents at all, preferring to use websites and word of mouth of past overseas students and their families. Some might also attend education exhibitions, partner with overseas schools, or conduct overseas ‘information’ trips where senior staff members, usually travelling with the Principal, make themselves available to families who may be contemplating sending a child to study in Australia.

Schools that do use agents often work with smaller agencies specialising in placing school age children. Agents can play a vital role in assisting families without friends or relatives in Australia to facilitate school placements in a destination of choice. Very often, relationships with agents can be longstanding, with agents supporting families through the duration of a child’s enrolment, rather than ceasing to be involved in a student’s progress after the enrolment process is completed. For this reason, it is important that any moves to further regulate agent activity take into account the different kinds of agency roles, relationships and work undertaken by agents for the school sector.

6. What more can Australian institutions do to better prepare graduates for success in their early careers?

Schools already provide a great deal of careers counselling to all students – Australian as well as international. Many international students take part in school Work Experience Programs.

7. What aspects of teaching and learning in Australia’s education settings contribute to a successful and satisfying study experience in Australia?

Schools contribute to a successful and satisfying study experience in many ways, including:

- a program of learning that is tailored to suit the needs of the student- i.e., one that is developed to both challenge the student but also accommodate the level of English Language comprehension
- a program of learning that is academically rigorous and designed to ensure the student is given the opportunity, if he/she works hard, to move on to a higher level of study- perhaps at a post compulsory/tertiary level or to a suitable and relevant workplace
- an environment where the student’s culture and religious heritage are accepted and understood- not just tolerated
- pastoral care policies, procedures and trained staff who are able to provide the level of care needed for each child within both an Australian context and within the guidelines of the student’s cultural background
- a community where the student is included, and is not part of a mini cultural ‘enclave’.

<p>The student is seen as and feels that he/she is a welcome member of the school community and he/she has valuable skills to contribute, and</p> <ul style="list-style-type: none"> • provision of clear guidelines regarding rules, regulations, expectations and cultural norms within the Australian context.
<p>8. What means might be employed to improve international students' experiences with respect to local social activity and engagement with local students and communities?</p>
<p>This is not an issue generally within an independent school community as the students, whether they are boarders, or reside with a homestay or family member, are living within the community and engage in all facets of the curriculum both within and outside of the school. This includes arts events, sports, community service programmes and so forth. In some tertiary institutions, students may study, work and live almost exclusively with other students of their own language or even own country, which may lessen the cultural value of their experience in Australia. Additionally, this may result in fewer opportunities to develop English language skills over the period of time.</p>
<p>9. How can services to support international students, such as transport concessions and health services, be provided in a more consistent manner across Australia?</p>
<p>Most schools ensure students are accommodated within easy travelling distance of the school, so transport costs are not such an issue. Schools have in place procedures for responding to health issues of any students. Boarding schools usually have a health centre on campus that is staffed usually by qualified nurses and attended by doctors on a needs basis.</p> <p>An area that could be improved is the area of referral to mental health services. In some states public providers are able to refer international students to government funded mental health services, but private providers are not able to refer students to these, and must find private practitioners for referral. There should be equity of access to mental health services for all international students, and these should be covered without exception by OSHC.</p>
<p>10. What, if any, further improvements need to be made to student visa and post-qualification work rules?</p>
<p>Not applicable.</p>
<p>11. What are the critical social infrastructure features that contribute to a vibrant international education experience for students learning, living and working in Australia? Where are the shortcomings in these?</p>
<p>Social infrastructure can be broadly categorised as:</p> <ul style="list-style-type: none"> • health • individual, family and community support • education • arts and culture • information • sport and recreation • housing • community development • employment and training • public safety • emergency services, and • public and community transport.

Ongoing work is needed in areas such as :

- arrival assistance, and for tertiary students, temporary and long-term housing
- assistance with getting settled
- planned integration of students into institutions and activities
- social and networking activities to assist students in cultivating long-lasting relationships, and
- continuing support for language development.

12. Is it desirable, or possible, to consider national, state and territory and/or institutional targets for a sustainable number of international students across the various education sectors?

ISCA does not believe that it is either desirable or possible to consider or set targets for institutions. Schools set their own limits on student intake based on their own criteria and demands for places.

13. What steps could Australia take to ensure that any further increase in international student numbers does not place unacceptable pressure on our social infrastructure?

Social infrastructure has been defined as being either 'hard' or 'soft'. Hard infrastructure is the more tangible items such as housing, transport, public works and so forth.

Schools will determine student intakes on their ability to provide these 'tangible' social infrastructure requirements as well as classroom availability, staff and resources. The 'soft' infrastructure requirements such as safety, care, leisure, and creative expression opportunities can be fulfilled within the constraints of the 'hard' infrastructure.

Any increases of international student numbers rely on the ability of a school to provide both forms of social infrastructure. The latter is nearly impossible to measure. Therefore, it can be argued that it should be a school decision as to whether or not an increase in international student numbers will place pressure on social infrastructure.

14. How can an international education strategy help institutions to capitalise on transnational education opportunities?

Not applicable.

15. How can Australia capture the opportunities emerging from the rise of the Asian Century while seeking geographical diversity in its international education engagement?

The scale and pace of Asia's transformation since the middle of the last century has been unprecedented. Hundreds of millions of people have moved from rural areas to new cities and correspondingly the need for resources and other goods and services has grown rapidly.

In order to capitalise on this growing change in social demographics, we need to be seen as a country with outstanding educational capabilities and possibilities. It is essential that we are seen as part of the Asian Century through our proximity, cultural awareness and inclusivity and on the provision of relevant education that will allow international students to be able to capitalise on this period of economic and social growth.

16. How can we encourage more students to learn an Asian language and to develop their Asia literacy?

It could be argued that Australia's education system needs a long-term action plan for Asia literacy if students are to consider studying Asian languages. Currently approximately 3% of all

students in Australia study Mandarin Chinese and of this 3%, 90% identify themselves as native Chinese speakers. This type of imbalance in the student population can only lead to a skewing of the final results that would disadvantage those students who are not native speakers. Native speakers need to be identified and statistically moderated separately from non-native speakers and this identification needs to be more accurate and thorough. For example, students of Malaysian backgrounds are generally fluent in three languages - Malay, English and Mandarin Chinese. They could, for example, indicate that Chinese is not their background language and then be moderated with non-native speakers.

As well as a plan to better develop language courses, a long-term plan is vital to ensure students can enter the workforce ready to do business with the rising economies. The plan should differentiate between strategies to ensure all students learn about Asia and strategies to expand the number studying Asian languages.

17. How can the sector and governments work together to encourage, support and increase the outbound mobility of Australian students and academics?

ISCA looks forward to the results of preliminary work undertaken by DEEWR in the Schools Internationalisation Stakeholder Matrix Survey in 2011. ISCA anticipates this work will be used to support and to provide some funding for internationalisation projects and student mobility within the school sector.

18. How do we use the high quality and international nature of Australia's science and research to strategically position Australia as a destination of choice for the world's best and brightest?

This is more applicable to tertiary institutions. It may be possible to showcase school student achievements in international science and mathematics competitions, and participation in events of this kind.

19. What additional incentives might be provided to increase international research collaborations?

Endeavour awards could strategically target school leaders in areas of pedagogy, school management, etc.

20. What priorities should Australia be addressing in its marketing and promotion to best support the international education sector?

The single most important step that can be taken at this point in time is to ensure there is a Minister / portfolio with International Education responsibilities, inclusive of all sectors.