

## Inquiry into the Welfare of International Students

**wel-fare** [wel-fair]

*-noun*

1. the good fortune, health, happiness, prosperity, etc., of a person, group, or organization

Random House Dictionary © 2009

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## 1.0 Submission Summary

A summary of the GPA / e2e.net submission is included below.

### Student Safety

- ✓ The Australian international education market must collectively focus on the overall 'brand' of Australian International Education.
- ✓ For providers, the future of maximising their brand, and augmenting their market share in an increasingly competitive environment means focusing on, and marketing, quality products and services to establish 'points of difference' over competing Institutions, regions or countries.
- ✓ Recent events which have threatened to damage Australia's long standing and deserved reputation as a quality, safe study destination are a minority, and as a result, not representative of the experience of most students.
- ✓ International students come to Australia grossly underprepared for what they encounter, and unaware of the requirements of their new environment.
- ✓ The leadership being shown by ACPET on ensuring adequate quality assurance procedures and codes of ethics are upheld amongst their members to limit substandard providers or practices is commendable, and should be highlighted and encouraged.
- ✓ More assistance should be provided to International students on core life skills such as financial management and budgeting.
- ✓ As a preferred delivery method, an investment in systems to provide this assistance must be made.

### Adequate and affordable accommodation

- ✓ GPA does not believe that accommodation is the responsibility of the Institute. Accommodation is the result of an agreement between the student and the accommodation provider. Training providers do not have a principle purpose of providing accommodation or employment services.
- ✓ Measures need to be taken to increase the attractiveness of student accommodation for developers and investors to increase supply of specific student accommodation options.
- ✓ Education Agents do not have a principle purpose of providing accommodation and any attempt by an Education Agent to provide any form of *managed* accommodation should be prohibited on the grounds of conflict of interest.
- ✓ Managed accommodation options should retain their tax free status to assist in the development of supply.

### **Social inclusion**

- ✓ Social inclusion relies on the reciprocal responsibilities of Australians (generally) and International students to understand their respective cultures and requirements.
- ✓ Research shows that students identify from their education experience that ‘making local friends’ is one of the top three most difficult things to do along with finding employment and finding accommodation.
- ✓ Social inclusion is not about ‘friends’ but more so the complex web of a myriad of interrelated elements that make people feel valued, ensures their differences are respected, and that their basic needs are met so they can live in dignity. This being accepted as true, the influence of Accommodation experience, academic experience and employment experience can not be understated.
- ✓ International students retain an ongoing relationship with 82% of people they worked with, only rated higher than ‘Other International Students’ at 88%. The data suggest that the Australian workplace enables students to make friends, feel valued and build longer lasting relationships.
- ✓ For International students, their level of satisfaction around education quality is higher than their level of satisfaction around employment outcomes.
- ✓ International students reported a much harder time in finding employment and the higher proportion of part-time work may be related to visa requirements that restrict them to 20 hours per week work.

### **Student visa requirements**

- ✓ With modest accommodation costs and often prepaid tuition fees, 20 hours per week enables a student to fund living and accommodation costs.

### **International student supports and advocacy**

- ✓ Current support services for students, particularly on campus, are disparate and the availability, range and quality of the services provided differs immensely between providers.
- ✓ Many providers fail to adequately support International students through either through the omission of adequate services, provision of inadequate services, or access to adequate information.
- ✓ In return for the vast amounts of revenue that International student generate for education providers each year, a higher percentage should be redirected to supporting the students overall experience.

- ✓ The 2009 / 2010 financial year will see a significant shift in the services that providers need to provide in order to remain competitive in this market.

### **Employment rights and protections from exploitation**

- ✓ Education and training providers have a clearly defined core business - they are structured to deliver education, training and academic outcomes – not Employment Services, employment preparation or industry outcomes.
- ✓ More work must be done to protect International student in relation to their employment rights.
- ✓ An International student should have equal access to employment opportunities, and once employed, receive the same respect and reward for the effort they expend.
- ✓ This requirement will be addressed in part by the provision of compulsory quality and dedicated Employment Services that result in stronger relationships between the education provider, Industry and the Employer.
- ✓ A large proportion of the responsibility for the success of the employer / employee relationship rests with the International students themselves. Students need to be educated on the requirements of Australian employers.
- ✓ If the employer provides a bonafide opportunity to an International student, the student is responsible for their performance, and for making the most of that opportunity.
- ✓ When a student chooses to enter into an employment arrangement outside of the legislative framework that has been established to provide and protect their rights, the student must take significant level of responsibility for the failure of that employer / employee relationship.

### **Appropriate pathways to permanency**

- ✓ GPA accepts the delicate balance that Commonwealth Government needs to manage between the value of the International education market, the importance of this market to the national GDP, its contribution local employment, rising local unemployment, the effects of underemployment and long term resourcing requirements through MODL
- ✓ GPA does caution on the ongoing practice of training International students seeking permanent residency through the acquisition of qualifications in skills areas where demand is not aligned with supply.
- ✓ Any significant departure from the current practices would have profound consequences, particularly on the private training market.

- ✓ Any departure from current practices should be made gradually, determined and implemented in close consultation with providers.

**The identification of quality benchmarks and controls for service, advice and support for international students studying at an Australian education institution**

- ✓ There is a growing volume of research, data, legislation, regulation etc that makes reference to the need to better align education and employment, the need for outcomes and the increasingly important role that Industry plays in education.
- ✓ Providers are still not compelled to provide dedicated Employment Services.
- ✓ The services promoted are often hollow misrepresentations, marketing tactics and not actually provided, or the services that are provided are not assessed to ensure that are adequate.

**2.0 Organisational Details**

This document was prepared by Graduate Programs Australia Pty Ltd (GPA), operators and managers of e2e.net – the education to employment network.

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### 3.0 Background to Graduate Programs Australia and e2e.net

The overview extracted below provides the context within which GPA has acquired the knowledge and experience used to formulate our responses in this submission to the Senate Enquiry into the Welfare of International Students.

GPA was established in October 1999 as a provider of specialist recruitment services to Australian public and private sector organisations that recruited graduates from TAFE and University. Over the past 10 years GPA has positioned itself as a premier provider of talent attraction strategies and services to many of Australia's largest employers (of graduates and otherwise) across all levels of government and the private sector.

In 2000 while undertaking the core business of GPA, a significant disconnect was identified between the training providers responsible for educating emerging talent, and the organisations wanting to employ them. It was harder than it should be for employers to build relationships with education and training providers for the express purpose of providing employment opportunities to their students and graduates.

The reason: **education and training providers were structured to deliver education, training and academic outcomes – not student services, employment preparation or industry outcomes.**

As a result of our experience through the period immediately prior to Y2K (January 2000), GPA approached the then Queensland Department of Innovation and Information Economy (DIIE) in April 2000 seeking information on the disconnect between Information and Communications Technology (ICT) educators and employers.

DIIE acknowledged the importance of the relationship between education and industry and in the absence of any other data; DIIE provided recurrent funding to GPA and a series of project partners for the purpose of engaging educators, employers and students.

The objective of the project was to better understand the respective needs of students and employers in the context of a student's transition to employment.

This data collection and research exercise was therein referred to as the e2e – The 'education 2 employment' Project. In the second and subsequent years of data collection, the e2e Project moved beyond the narrow Information and Communications Technology focus and adopted wider terms of reference to cover all disciplines.

The e2e project involved 45,000 student per year from 50 locations across Australia, and approximately 10,000 employers per year.



Over a 5 year period (2000 – 2004) the e2e Project results showed that:

- ✓ Students confidence over their employment prospects was low despite unemployment being low - they did not understand what was required of them in the transition to employment
- ✓ Institute resources were more focused on delivering educational outcomes and career guidance – not employment preparation and industry relationships
- ✓ There was no dedicated and consistent resource for employers to communicate employment opportunities to students or recent graduates
- ✓ Most Institutions did not have the systems or business processes required to meet the needs of Industry requiring skills and talent, resulting in low satisfaction rates amongst employers
- ✓ The services promoted to students through an Institutes marketing collateral often differs significantly in quality and substance than the services actually delivered
- ✓ There are no standards or regulations for the delivery of Employment Services to students

Outlined below are two tables showing the summaries responses from students and industry. When concluded in 2005, the e2e project results highlighted that:

<b>99%</b> Of students needed assistance with employment preparation and transition to employment	<b>83%</b> Visited on campus careers centres < 3 times EVER with the 76% of all visits in year one	<b>8.2%</b> (only) Use traditional campus services for job searching activities	<b>80.5%</b> Of students use family, friends or the Internet as their main source of assistance when looking for work
<b>69.1%</b> Saw their employment prospects as Poor – Average	<b>34</b> Main areas where students identified the greatest difficulty in the transition to employment	<b>e2e.net</b>	<b>96%</b> Of respondents felt better prepared for employment after e2e

When reviewing industry responses, the research found that building relationships with providers was a costly and repetitive process for industry / employers, often to find that most providers did / do not have a dedicated service to assist / support industry.



No consistent method to communicate employment opportunities to providers	Services were traditionally focused around career guidance and counseling services	Contact points in institutions were not clearly defined	Required a repetitive process even between different locations from a single provider
Traditional online sources of talent were delivering 'quantity not quality' of applications	Service level was poor	Providers focus was on delivering training solutions	No solution / result to help employers combat skills shortages or attraction issues

As a result of the e2e Project, [e2e.net : the education to employment network](#) was developed.

The objectives of e2e.net include:

- Assist educational providers to maximise their competitiveness in a global market while better responding to the needs of industry, employers and students (domestic and international)
- Ensure that students are adequately prepared for the transition from education to employment and that they met the needs of industry
- Improve the quality of the process by which employers and industry market their organisation, industry or employment opportunities to education and training providers
- Reinforce the central and critical role that educators have in meeting the future skill needs of industry



*Dedicated Employment Services and Industry Relationships are becoming increasingly more important in education.*

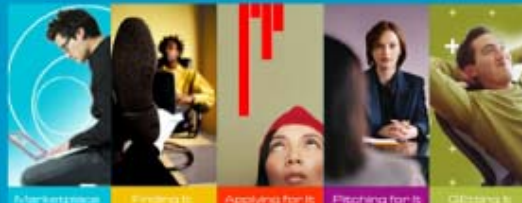
e2e.net has been designed to deliver a complete, managed and fully supported Employment Services product that assists Institutions to improve their competitiveness in the current market, while responding to the varying needs of Students and Industry.

**To support these functions, e2e.net combines three separate yet related platforms.**

## e2e.net = eRecruitment + eLearning + eReporting

**eRecruitment:** Uses an eRecruitment platform to deliver services to industry and opportunities to graduates/students

**eLearning:** Uses an eLearning platform to better prepare students for the transition to employment



**eReporting:** Uses a statistical reporting engine to collect, manipulate and interpret users and session data (predict future requirements)



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or visit [www.e2e.net.au](http://www.e2e.net.au)  
and register for a FREE  
'Overview of e2e.net' webinar.

e2e.net leverages the cost saving benefits of technology, amortises the provision of shared support services for students and employers across all participating Institutes, and incorporates a sustained Industry engagement function across multiple industries to promote the availability of e2e.net.

Through e2e.net, institutions are able to deliver a greater range of dedicated, tangible, high quality, Employment Services to meet the changing needs of students and Industry.

See our other e2e.net Information Sheets:

Reporting Capabilities | Industry Engagement | Student Marketing – Engagement | Support Services | Learning Modules

e2e.net was launched in 2005 to support Institutions who identified the importance of Employment Services, outcomes and Industry relationships.

e2e.net has enjoyed significant growth over this period, particularly in the current market, and is now available through participating institutes to an estimated 115,000 students per annum, and has an Industry partner network consisting of approximately 60,000 employers.

A recent submission and presentation to AEI demonstrated the support for e2e.net from the Australian international education industry. This support is based on the success of past projects, and the Institutes recognition of the value, support and resources that e2e.net provides to International students, On the basis of existing projects / contracts / opportunities, the recent AEI submission was supported by:



On current growth rates, e2e.net is conservatively forecast to grow to between 745,000 – 1,100,000 students / alumni and 120,000 employers by December 2012.

Our position within the Australian education market as a supplier of managed services to students, industry, employers and Institutes gives us a unique cross section of experience and knowledge.

The high proportion of International students enrolled with our education partners (e.g. ACPET), and with other partners having significant growth targets for the attraction of International Students (e.g. TAFE South Australia), our ability to understand the needs of International students and respond appropriately to their changing needs is paramount to the ongoing success of our business.

With respect to the International student lifecycle, we are repeatedly engaging students at points in this cycle when they have a high dependency on the limited, dedicated support services available – when newly arrived and developing their understanding of the local market, when seeking their first employment opportunity to fund accommodation and tuition costs, when they need to find vocational placement as part of their course (where required), when seeking full time employment upon graduation.

It is this diverse knowledge base developed over the last 10 years that we bring to the Senate Enquiry into the Welfare of International Students.

#### **4.0 Information about the Inquiry**

On 17 June 2009 the Senate referred the following matters to the Senate Education, Employment and Workplace Relations Committee for inquiry and report.

(a) the roles and responsibilities of education providers, migration and education agents, state and federal governments, and relevant departments and embassies, in ensuring the quality and adequacy in information, advice, service delivery and support, with particular reference to:

- (i) Student safety,
- (ii) Adequate and affordable accommodation,
- (iii) Social inclusion,
- (iv) Student visa requirements,
- (v) Adequate international student supports and advocacy,
- (vi) Employment rights and protections from exploitation, and
- (vii) Appropriate pathways to permanency;

(b) the identification of quality benchmarks and controls for service, advice and support for international students studying at an Australian education institution; and

(c) any other related matters.

## Response from GPA and e2e.net

### 5.0 Roles and responsibilities in ensuring the quality and adequacy in information, advice, service delivery and support

The Institutes with which we have engaged through e2e.net are spread primarily across the public and private, tertiary and VET sectors. Our interactions within these institutes range from Chancellor and Registrar level engagement, Institute owners and Directors, academic, administrative and support staff, to direct engagement of students across all stages of the student lifecycle.

In addition to the engagement with Institutes, the combined exposure to industry through the GPA and e2e.net businesses equips us with an extensive and intricate knowledge of the requirements of industry and employers.

If an International student is coming to a foreign country, often financially under resourced and often alone, to undertake high dollar value education; the education provider who is responsible for the quality of the training product, and the employer who provides the opportunity for the student to fund their tuition and accommodation costs, are in a position of significant influence over the ultimate welfare of an international student.

It should also be noted that the Australian international education market is a well established and lucrative industry (albeit generally unknown or misunderstood by those who are not directly involved in the industry). Despite the historical successes of the industry in Australia, it is a changing market facing intense pressure from:

- Increased competition for other nations (e.g. Canada) and regional centres (e.g. Singapore and Malaysia)
- Increased demand on overall product and service quality due to the consumers recognition of their extensive economic contribution
- The need to focus on the overall student experience aside from the traditional denominator of 'program quality'

**The Australian international education market must collectively focus on the overall 'brand' of Australian International Education.** The market (elements of) can not continue to be self absorbed within a path of inward capitalism where individual providers are fixated on volume and revenue growth forsaking all other factors including substance and quality.

**For providers, the future of maximising their brand, and augmenting their market share in an increasingly competitive environment means focusing on, and marketing, quality products and services to establish 'points of difference' over competing Institutions, regions or countries.**

As a result, the Senate Inquiry should not be focused on looking to instruct an established market how to operate, but be looking acutely for every avenue to apply standards and measures that are aimed at differentiating between quality and substandard providers. This in turn will increase the overall quality of the Australian international education 'product'

## 5.1 Student Safety

While it is unconscionable to hold any position other than to emphatically support a students fundamental right to a safe learning and living environment at all times, it must also be acknowledged that **recent events which have threatened to damage Australia's long standing and deserved reputation as a quality, safe study destination are a minority, and as a result, not representative of the experience of most students.**

While any deliberate act that intentionally injures another person is not justifiable, the media have a responsibility to protect the integrity of the industry and balance any negative reports with some of the many examples of providers who run successful, stable and well respected organisations, or with students who enjoy a safe and productive social and academic experience.

Student safety can be broken into 2 major areas: Physical Safety and Financial Safety.

### 5.1.1 Physical Safety:

One of the major factors that affect the physical safety of a student is knowledge. **International students come to Australia grossly underprepared for what they encounter, and unaware of the requirements of their new environment.**

Physical safety can be improved by:

- a. More accurate and accessible information for students prior to arriving in Australia. The minimalist approach taken by unscrupulous commission or volume driven Education Agents needs to be halted. Compulsory Induction programs need to be tailored to a specific geographic region or industry based on the study and living preferences of the student.
- b. Better use needs to be made of technology like e2e.net to support the cost effective delivery of a dedicated induction solution to these requirements. The solution should provide students with accurate, detailed, localised eLearning resources and information based on their employment, accommodation and leisure preferences.
- c. Special attention needs to be paid to safety on public transport for International students. With many International students working 'undesirable' jobs to fund tuition and accommodation, this work generally involves out-of-hours shift work, or the requirement to work largely alone.

### 5.1.2 Financial Safety

Every International student makes a significant financial commitment when they make a purchasing decision to study in Australia. We, collectively, need to respect this commitment and its value to our economy, and ensure this source of investment is adequately protected.

Financial safety can be improved by:

- a. More accurate and accessible information for students on the actual living costs in specific cities or regions in Australia. This could relate to establishment costs, accommodation costs, transport costs etc
- b. Better use needs to be made of technology to support the cost effective delivery of a dedicated solution to these requirements. The solution should provide students with accurate, detailed, localised eLearning resources and cost and financing information based on their employment, accommodation and leisure preferences.
- c. Events of recent weeks in Brisbane, Sydney and Melbourne have highlighted the devastating financial impact that college closures and failures put on students – domestic and International. A more rigorous accreditation and compliance process is required to limit these failures

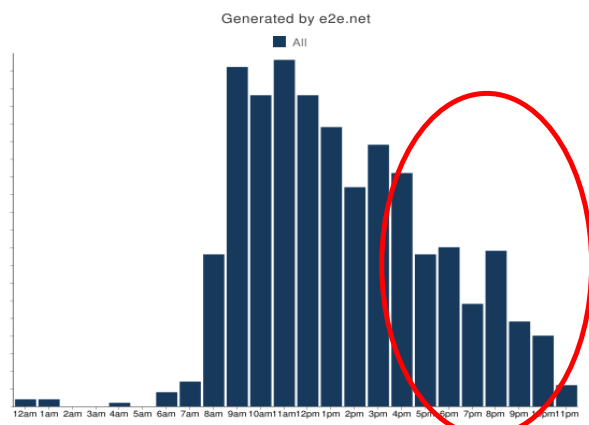
Responding to the negative publicity these events generate by simply redirecting to the existence of Tuition Assurance is insufficient. This type of 'deflection' only masks the symptom and does nothing to protect students in the long term or address the cause. **The leadership being shown by ACPET on ensuring adequate quality assurance procedures and codes of ethics are upheld amongst their members to limit substandard providers or practices is commendable, and should be highlighted and encouraged.**

- d. **More assistance should be provided to International students on core life skills such as financial management and budgeting.** These resources can be integrated into curriculum or pastoral assistance. Online resources such as e2e.net should include budget tools, expense calculators etc aimed at improving the level of day-to-day financial literacy amongst students. These tools should also go so far as assisting the students to understand the Australian banking system.

Multiple references have been made here to the use of dedicated online system to assist in the delivery of these services, resource and assistance to International students.

Students have a preference for online resources, and as the graph on the right shows (using actual e2e.net reporting data) a high proportion of students make use of an online resource outside of normal operating hours.

As the preferred medium, and a cost effective delivery method for Institutes, an investment in systems is required to assist students.



## 5.2 Adequate and affordable accommodation

GPA acknowledges the basic human need of International students to have access to adequate and affordable accommodation.

**GPA does not believe that accommodation is the responsibility of the Institute. Accommodation is the result of an agreement between the student and the accommodation provider.**

Student accommodation options vary significantly for students. If accommodation options were broadly categorised into 3 categories:

- 'Specific' to cover student specific options such as UniLodge,
- 'Independent' to represent the greater private / investor driven rental market, and
- 'Managed' covering options such as Homestay

each accommodation option represents its own challenges for students in the current market.

*Specific* is highly desirable for students due to its purpose built nature, low maintenance, general higher level of physical security, focus on amenities (like broadband, cabling etc) and proximity to their Institution. The primary issue with *Specific* is the imbalance due to supply being unable to meet demand for this type of accommodation solution.

**Measures need to be taken to increase the attractiveness of student accommodation for developers and investors.** Some initiatives should include:

- Abolition of stamp duty on low cost student accommodation projects
- Greater consideration in zoning and planning legislation to permit suitably located accommodation developments
- Improved speed of Development Application approval
- Tax concessions for approved Developers of low cost student accommodation
- Subsidised borrowing costs for developers of low cost student accommodation
- In an environment of tighter finance markets, a State or Commonwealth secured guarantee on project financing for low cost student accommodation

*Independent* accommodation suffers the same demand issues as specific. With low new dwelling establishment levels, and continuing population increases, the pressure on the current rental market is increasing in most capital centres across Australia. Sustained demand on rental accommodation has driven rental rates to record highs making *Independent* accommodation a highly competitive and expensive option for International students.

The other issue that restricts International student access to *Independent* accommodation is the requirement for increasingly longer minimum rental terms, with many students only studying in Australia for shorter periods of time.



*Managed* accommodation is an increasingly popular option for International students.

Wide reaching instances of issues such as substandard accommodation offerings, no support for students, abuse, misrepresentation of facilities, overcrowding and hot bedding (several students sharing the same bed in 'shifts' have resulted in many negative perceptions of managed accommodation as an option and more importantly as an industry.

GPA has witnessed significant advances over the past few years in relation to the quality of *Managed* accommodation for students. In much the same way that e2e.net has put a minimum service level and performance standard under Employment Services in education, the work of the Australian Homestay Network (AHN) has put minimum service and performance standards under Homestay accommodation options.

These minimum performance standards (employment and accommodation) should be adopted as national standards, and providers should have their organisation, products and services measured against them before being able to operate.

The recent announcement of the Education Services for Overseas Students Amendment (Re-registration of Providers and Other Measures) Bill 2009 puts a greater emphasis on 'principle purpose' and 'demonstrated capacity to deliver at a satisfactory standard' – education and **training providers are not in the principle purpose of providing accommodation or employment services.**

It should also be noted clearly that **Education Agents do not have a principle purpose of providing accommodation** and any attempt by an Education Agent to provide any form of *managed* accommodation should be prohibited on the grounds of conflict of interest.

### 5.3 Social inclusion

A socially inclusive society is defined as one where all people feel valued, their differences are respected, and their basic needs are met so they can live in dignity. The converse, Social exclusion, is the process of being shut out from the social, economic, political and cultural systems which contribute to the integration of a person into the community (Cappo 2002).

Research shows that students identify from their education experience that "making local friends" is one of the top three most difficult things to do along with finding employment and finding accommodation. (*Experiences of International Students in New Zealand report 2007*). GPA has quoted New Zealand research here as representative because the same report also stated that 'Those International students who did not choose New Zealand as first choice would prefer Australia'.

**Social inclusion relies on the reciprocal responsibilities of Australians (generally) and International students to understand their respective cultures and requirements.**

This is not a one sided issue however International students in Australian VET programs report a higher satisfaction with being able to make Australian friends (67%) versus Australian Students (44%). (*2007 Follow-up Survey of International Students – AEI*)

GPA accepts that social inclusion is not about ‘friends’ but more so the complex web of a myriad of interrelated elements that make people feel valued, ensures their differences are respected, and that their basic needs are met so they can live in dignity. This being accepted as true, the influence of Accommodation experience, academic experience and employment experience can not be understated – specifically the importance of Employment.

The same 2007 AEI study shows that International students retain an ongoing relationship with 82% of people they worked with, only rated higher than ‘Other International Students’ at 88%. **The data suggest that the Australian workplace enables students to make friends, feel valued and build longer lasting relationships.**

The 2007 AEI data showed that “The level of satisfaction around education quality were higher than those around employment outcomes. **International students reported a much harder time in finding employment** and the higher proportion of part-time work may be related to visa requirements that restrict them to 20 hours per week work.”

#### **5.4 Student visa requirements**

GPA supports the current visa system that enables students on a student visa to work 20 hours per week.

In relation to student employment, we see two great needs:

- 1. To adequately prepare International students to better understand the Australian job market**
- 2. Educate employers on the value, skills and diversity that International students can bring to the workplace.**

Making no allowance for the current unemployment rates and the limited supply of bonafide part time and casual employment opportunities; with modest accommodation costs and often prepaid tuition fees, 20 hours per week enables a student to fund living and accommodation costs.

#### **5.5 Adequate international student supports and advocacy**

Current support services for students, particularly on campus, are disparate, and the availability, range and quality of the services provided differs immensely between providers.

Providers market specifically to International students, they encourage them to a purchasing decision that involves studying in Australia, then they enroll them with full knowledge of the issues and difficulties they will face.

**Many providers fail to adequately support International students through either through the omission of adequate services, provision of inadequate services, or access to adequate information.**

**It is GPA's clear position that in return for the vast amounts of revenue that International student generate for education providers each year, a higher percentage should be redirected to supporting the students overall experience.**

Some areas where providers should be focusing greater resources are into:

- The provision of dedicated Employment Services
- Ensuring appropriate accommodation standards (as distinctly separate from providing accommodation service)
- Dedicated 'pastoral care' with a designated support person or group
- Industry relationships to educate employers on the benefits of employing International Students.

The 2009 / 2010 financial year will see a significant shift in the services that providers need to provide in order to remain competitive in this market.

## **5.6 Employment rights and protections from exploitation**

More work must be done to protect International student in relation to their employment rights. An International student should have equal access to employment opportunities, and once employed, receive the same respect and reward for the effort they expend.

**This requirement will be addressed in part by the provision of compulsory quality and dedicated Employment Services that result in stronger relationships between the education provider, Industry and the Employer.**

It should be noted that International students often fill positions that Australian students (or the general Australian population) have no interest in filling. Some examples include late night and weekend night taxi shifts, cleaning, aged / domicile care, shift retail etc).

GPA is also firmly of the opinion that a large proportion of the responsibility for the success of the employer / employee relationship rests with the International students themselves. **Students need to be educated on the requirements of Australian employers**, where relevant, students need to be made aware of the cultural differences in work ethic and commitment between their home countries and what is required in our employment market. Employers should not have to accept any less effort, commitment or performance from an International student that they would from anyone else. **If the employer provides a bonafide opportunity to an International student, the student is responsible for their performance, and for making the most of that opportunity.**

Furthermore, provided the student is adequately educated on (and understands) their employment rights, relevant industrial relations law, and the requirements of the Australian workplace, and the student then chooses to enter into an employment arrangement outside of the legislative framework that has been established to provide and protect their rights, the student again must take significant element of responsibility for the failure of that employer / employee relationship.

### 5.7 Appropriate pathways to permanency

GPA accepts the delicate balance that Commonwealth Government needs to manage between the value of the International education market, the importance of this market to the national GDP, its contribution local employment, rising local unemployment, the effects of underemployment and long term resourcing requirements through MODL.

GPA does caution on the ongoing practice of training International students seeking permanent residency through the acquisition of qualifications in skills areas where demand is not aligned with supply.

**Any significant departure from the current practices would have profound consequences, particularly on the private training market. Any departure from current practices should be made gradually, determined and implemented in close consultation with providers,** and should be based on substantiated data and the recognition of long term skill needs for Australian business.

Australia is a culturally diverse nation and with a small (comparative) population, we rely on migration to provide the skills Australian industry requires.

### 6.0 The identification of quality benchmarks and controls for service, advice and support for international students studying at an Australian education institution

**There is a growing volume of research, data, legislation, regulation etc that makes reference to the need to better align education and employment, the need for outcomes and the increasingly important role that Industry plays in education.**

**But still, providers are not compelled to provide Employment Services,** the services promoted are often marketing tactics and not actually provided, or the services that are provided are not assessed to ensure that are adequate. In many instances these services simply serve to add an addition revenue generating service for the provider.

e2e.net has been developed to ensure that providers can augmenting their market share in an increasingly competitive environment by focusing on, and marketing, quality Employment Services to establish 'points of difference' over competing institutions.