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19 August 2024

Dear Secretariat,

Thank you for inviting Charles Darwin University (CDU) to take part in the Senate Inquiry into the Education Services for Overseas Students Amendment (Quality and Integrity) Bill 2024. I am writing to respond to the on-notice questions raised during the hearing on 6 August 2024.

Senator Sarah Henderson requested further information relating to international student numbers, enrolments, accommodation and revenue. A detailed brief covering this information is included in **Attachment A**.

CDU provides various accommodation options for students, including International House Darwin (IHD) on the Casuarina campus. IHD offers a vibrant community with 287 beds, comprising 227 long-term and 60 short-term options. Due to high demand, students often need to join a waitlist. Located just two minutes from campus amenities and close to a major shopping area, IHD provides a supportive environment with access to computer facilities, study rooms, recreational areas, and a swimming pool. Rooms are well-equipped, with some featuring ensuite options.

UniLodge, an off-campus option, offers 300 beds and is typically full during peak times, though some shared rooms may be available. Situated near Casuarina Shopping Centre and just a five-minute walk from the Casuarina campus, UniLodge is convenient for students studying at Casuarina, Palmerston, or Darwin Waterfront. The facility includes a recreation room, large media room with FOXTEL, outdoor terrace with BBQs, and study rooms on each level, providing a range of room options at different rates.

Study-Stays, the University's online noticeboard, helps students find off-campus rental properties. Students can meet with the Off-Campus Accommodation Officer to explore housing options before arrival. While Study-Stays cannot book accommodation on behalf of students, they assist in finding suitable options. Students seeking private accommodation are also encouraged to contact local real estate agents for additional listings.

Senator Tony Sheldon raised several questions pertaining to accommodation revenue, and the options available to students if they wish to lodge a complaint relating to accommodation. CDU owns and operates its own accommodation facility, IHD. While CDU promotes UniLodge as an off-campus accommodation option, there is no formal partnership, and CDU does not receive any commission fees from this arrangement.

With respect to complaints from students about the housing provided via our business accommodation partners, CDU's student complaints process does not extend to UniLodge as an accommodation provider. However, according to information provided by UniLodge, they received a total of 83

complaints between January 2023 and July 2024. It is important to note that these complaints are not necessarily from CDU students. Within the same timeframe, CDU's internal Complaints Unit received two complaints regarding IHD.

In terms of the categories or reasons for complaints, the complaints lodged with UniLodge covered various issues, including noise, laundry collection, internet connectivity, roommate conflicts, fire alarms, UniLodge policies, maintenance, and damage to personal property. The two complaints received by IHD were related to contract issues.

As for a breakdown of the number and proportion of complaints by business accommodation partners, I must clarify that CDU does not have formal partnerships with any external accommodation providers, including UniLodge.

Regarding the process for students to lodge complaints about accommodation organised through business accommodation partners, UniLodge has outlined the following procedure: Complaints can be lodged by phone, email, the UniLodge app, or in person and are submitted as a "Care Report." UniLodge contacts all tenants fortnightly to gather information about their well-being, and responses are stored under the tenant's profile. The Care Report is reviewed by staff daily, with concerns logged and actioned accordingly. Negative responses trigger an email to the Care Response team, which includes both on-site and off-site staff.

For IHD, complaints are managed under the Student Complaints Policy, starting with a local resolution in discussion with the Residence Manager. If necessary, a formal complaint can be submitted via an online web form within 20 days of the local resolution outcome. All complaints related to misconduct are managed under the University Resident Conduct Policy.

In terms of steps taken to investigate complaints, IHD follows the aforementioned policies, while UniLodge has its own internal procedures to address and investigate complaints, which are managed independently from CDU's processes. This also applies to the steps taken to ensure that issues are appropriately addressed. At IHD, these steps are codified in relevant CDU policies, whereas UniLodge operates independently and follows its own internal procedures.

When asked whether these steps are codified in a University policy or are discretionary, I can confirm that the steps for IHD are indeed codified in University policies and UniLodge has their respective internal guidelines and policies.

Regarding the resolution of complaints, CDU does not have specific details on UniLodge complaints, including the number and proportion resolved in favour of the complainant. For IHD, the two complaints lodged within the past 12 months were not upheld. These complaints were subsequently taken to the Anti-Discrimination Commission but were later withdrawn.

At the time of inquiry, IHD has allocated 222 beds, with 6% occupied by domestic students and 94% by international students. No beds are currently reserved. CDU does not have specific information regarding bed allocation or utilisation for UniLodge.

Senator Lisa Darmanin requested that the University elaborate on a particular point of our submission, namely the fact that CDU is of the opinion that a "one size fits all" approach should not be adopted

when considering the application of limits. Limits must be coordinated, analysed, and allocated based on the unique characteristics of each educational institution, region, and demographic composition.

The University strongly supports a flexible and individualised approach to limits due to several critical reasons:

1. **Unique Role in the Northern Territory:** CDU is the only university based in the NT, serving a vast and diverse region with unique educational and workforce needs. International students at CDU fill essential roles in the local economy, particularly in sectors like healthcare, engineering, and education, where there is a significant skills shortage. Imposing uniform limits on international student intake could severely disrupt these vital contributions.
2. **Economic and Community Impact:** International students are crucial to the economic sustainability of CDU and the broader NT community. They contribute not only through tuition fees but also by supporting local businesses and services. For a region like the NT, where economic opportunities can be limited, the presence of international students helps sustain the University's operations and supports regional development goals.
3. **Cultural Diversity and Indigenous Engagement:** CDU is a leader in Indigenous education and research, with international students contributing to a rich and diverse cultural exchange that enhances the learning environment for all students. The interaction between international students and the local Indigenous communities at CDU fosters mutual understanding and supports the university's mission to integrate Indigenous knowledge into its programs. Uniform restrictions could diminish these unique opportunities for cultural exchange.
4. **Population Growth and Regional Development:** The NT faces challenges related to population growth and retention, and CDU plays a key role in addressing these issues. Many international students choose to stay in the NT after graduation, contributing to the local workforce and community. This is particularly important in a region that struggles with population decline. A one size fits all policy on international student limits could undermine efforts to attract and retain skilled individuals in the NT.
5. **Dependence on International Students:** Unlike larger metropolitan universities, CDU has a higher dependency on international students for maintaining a broad range of academic programs and research initiatives. Limiting international student numbers uniformly could disproportionately impact CDU, potentially leading to cuts in programs that are essential for both local and international students.
6. **Alignment with Government Priorities:** The NT Government has specific priorities related to economic growth, workforce development, and population sustainability. CDU's ability to recruit international students is aligned with these priorities, as these students help address skills shortages and contribute to regional growth. A one size fits all approach could conflict with these strategic objectives, particularly in a region as unique as the NT.

Given CDU's pivotal role in the Northern Territory's development and the unique challenges faced by the region, it is essential that any government policies on international student limits are flexible and tailored to the specific needs of regional universities like CDU. A nuanced approach would better support the University's mission and the NT's broader socio-economic goals.

If the limits outlined in Part 7 are to be imposed, CDU strongly urges that clarity be provided for 2025, diverging from the position of other universities advocating for a 2026 implementation. The uncertainty caused by Ministerial Direction 107, combined with the recent increase in visa processing fees to \$1600, continues to disproportionately benefit large metropolitan universities with Visa Evidence Level 1 status. These institutions have capitalised on their ability to enrol a significant number of international students from 'low-risk' countries, further consolidating their advantage.

This situation has placed CDU at a significant disadvantage, particularly as the only university headquartered in the Northern Territory. Data from the PRISMS and DHA Student visas granted pivot table clearly illustrates this impact:

- The NT experienced a dramatic 67.4% decline in offshore visa grants from January-June 2023 compared to the same period in 2024.
- In the first half of 2023, the NT accounted for 0.8% of national visa grants, but this share dropped to just 0.4% in the same period in 2024.
- Not only has the absolute number of visa grants declined from 2023 to 2024, but proportionally, the NT has lost its share of visa grants to other states and territories, with NSW, VIC, and ACT all increasing their respective shares.

This data underscores the urgent need for tailored approaches and timely clarifications to avoid further exacerbating the challenges faced by CDU and the NT.

I again thank you for the opportunity to participate in this critical inquiry. If any points require further clarification, please contact Mrs Melanie Mayo, Government Relations Adviser on [melanie.mayo@cdu.edu.au](mailto:melanie.mayo@cdu.edu.au).

Yours sincerely

~~Professor Scott Bowman AO~~  
~~Vice-Chancellor and President~~

# ATTACHMENT A

## 1. Current international student numbers and forecasts

### Current International Student Enrolments

	Current International Student Enrolments						
	2018	2019	2020	2021	2022	2023	YTD 2024*
Degree & Research	2,056	1,963	2,146	2,048	2,042	3,632	3,393
Vocational Education & Training	219	277	238	234	214	357	240
<b>Total</b>	<b>2,275</b>	<b>2,240</b>	<b>2,384</b>	<b>2,282</b>	<b>2,256</b>	<b>3,989</b>	<b>3,633</b>

\*YTD 2024 for Degree and Research as at Friday 16th August 2024

\*YTD 2024 for Vocational Education & Training as at 30th June 2024 (Q2 AVETMISS Submission)

### Projected International Student Enrolments

	Projections						
	EOY 2024**	2025	2026	2027	2028	2029	2030
Degree & Research	3,823	4,705	6,117	7,529	7,680	7,833	7,989
Vocational Education & Training	240	295	383	471	480	490	500
<b>Total</b>	<b>4,063</b>	<b>5,000</b>	<b>6,500</b>	<b>8,000</b>	<b>8,160</b>	<b>8,323</b>	<b>8,489</b>

\*\* Includes YTD 2024 + Projected Intake into Summer Semester 2024 (mid scenario)

## 2. Confirmation of enrolment numbers for 2025

The final enrolment numbers for 2025 remain uncertain until the release of international student caps. However, CDU has provided projections above, aligned with the D2 targets, which are essential for meeting the obligations associated with the NAIF loan used for the development of the Education and Community Precinct. These projections are carefully formulated to ensure that the university can sustain its commitments while addressing the strategic needs of both the institution and the region.

## 3. International student numbers as a proportion of your total student cohort

	Actual - All Campuses					FEOY 2024	Scenario 1 Projections					
	2019	2020	2021	2022	2023		2025	2026	2027	2028	2029	2030
% International All Students (HE and VET)	8.3%	8.2%	8.0%	8.3%	13.4%	14.6%	16.8%	20.5%	23.7%	23.8%	23.8%	23.9%

	Actual - All Campuses					FEOY 2024	Scenario 1 Projections					
	2019	2020	2021	2022	2023		2025	2026	2027	2028	2029	2030
% International Degree and Research Only	17.7%	16.5%	14.9%	16.6%	28.8%	30.2%	34.2%	39.4%	43.1%	42.6%	42.2%	41.8%

## 4. Breakdown of courses studied by international students

Degree and Research Course International Course Enrolments – 2023 & YTD 2024

		2023	YTD 2024
<b>ACCOUNTING AND FINANCE</b>	B ACCOUNTING	191	149
	B ACCOUNTING/DIP LAWS	1	5
	M PROFESSIONAL ACCOUNTING	2	2
	M PROFESSIONAL ACCOUNTING (PROFESSIONAL PRACTICE)	346	344
<b>AUDIOLOGY</b>	M CLINICAL AUDIOLOGY	6	12
<b>BIOMEDICAL SCIENCE</b>	B BIOMEDICAL SCIENCE	8	5
<b>BUSINESS</b>	B BUSINESS	63	16
	B DIGITAL ENTERPRISE	6	5
	M BUSINESS ADMINISTRATION (PROFESSIONAL PRACTICE)	1	
	M BUSINESS ADMINISTRATION SUSTAINABLE ENTERPRISE	9	8
	M BUSINESS ADMINISTRATION SUSTAINABLE LEADERSHIP	79	74
<b>CROSS INSTITUTIONAL</b>	PG SERVICE		1
	UG SERVICE	7	
<b>DATA SCIENCE</b>	M DATA SCIENCE	167	213
<b>DESIGN</b>	B DESIGN	1	
<b>EDUCATION</b>	B ED EARLY CHILDHOOD TEACHING	38	32
	B ED PRIMARY	1	3
	B ED SECONDARY	6	8
	GRAD CERT SPECIALIST EDUCATION		1
	GRAD CERT UNIVERSITY LEARNING AND TEACHING	1	
	GRAD DIP SPECIALIST EDUCATION	1	1
	M EDUCATION	18	17
	M TEACHING BIRTH TO FIVE YEARS		3
	M TEACHING EARLY CHILDHOOD	38	55
	M TEACHING PRIMARY	97	76
M TEACHING SECONDARY	23	34	
<b>ENGINEERING</b>	B ENGINEERING HONOURS	45	40
	B ENGINEERING SCIENCE	38	32
	B ENGINEERING SCIENCE/M ENGINEERING	3	1
	DIP ENGINEERING	1	
	M ENGINEERING	186	186
	M ENGINEERING EXTENDED	4	7
	M PROJECT MANAGEMENT	12	32
<b>ENVIRONMENTAL SCIENCE</b>	B ENVIRONMENTAL SCIENCE	6	1
	B SCIENCE	2	2
	M APPLIED SPATIAL SCIENCE	2	4
	M ENVIRONMENTAL MANAGEMENT	45	52
<b>EXERCISE AND SPORT SCIENCE</b>	B EXERCISE AND SPORT SCIENCE	3	5
	DIP EXERCISE AND SPORT SCIENCE	1	
<b>HEALTH RESEARCH</b>	GRAD DIP HEALTH RESEARCH	1	
	GRAD DIP PUBLIC HEALTH	7	1
	M PUBLIC HEALTH	2	5
	M PUBLIC HEALTH / M HEALTH RESEARCH	9	8
<b>HEALTH SCIENCE</b>	B HEALTH SCIENCE	82	46
	B HEALTH SCIENCE/M OCCUPATIONAL THERAPY	8	13
	B HEALTH SCIENCE/M PHYSIOTHERAPY		1
	B HEALTH SCIENCE/M SPEECH LANGUAGE THERAPY	4	4
	B HEALTH SERVICES MANAGEMENT	11	8
	B PUBLIC HEALTH	20	12
	DIP HEALTH SCIENCE		1
	GRAD DIP HEALTH AND SOCIAL CARE	5	22

Degree and Research Course International Course Enrolments – 2023 & YTD 2024 cont...

		2023	YTD 2024
<b>HUMANITARIAN, EMERGENCY AND DISAST..</b>	B HUMANITARIAN AID AND DEVELOPMENT	168	187
	M EMERGENCY AND DISASTER MANAGEMENT	19	20
<b>INDIGENOUS KNOWLEDGES</b>	B ARTS (HONS)		1
	M ARTS	7	3
<b>INFORMATION TECHNOLOGY</b>	B COMPUTER SCIENCE	40	46
	B INFORMATION TECHNOLOGY	300	275
	B SOFTWARE ENGINEERING HONOURS	6	9
	M INFO TECH (ARTIFICIAL INTELLIGENCE)		8
	M INFO TECH (CYBER SECURITY)	215	247
	M INFO TECH (INFORMATION SYSTEMS AND DATA SCIENCE)	77	49
	M INFO TECH (INFORMATION SYSTEMS)	163	210
	M INFO TECH (SOFTWARE ENGINEERING)	108	105
<b>INTERNATIONAL PATHWAYS</b>	ACCELERATED INTERNATIONAL MASTERS QUALIFYING	29	7
	DIP BUSINESS STUDIES	51	14
	DIP INFORMATION TECHNOLOGY	68	19
	ENGLISH FOR ACADEMIC PURPOSES 3	52	10
	ENGLISH FOR ACADEMIC PURPOSES 4	76	20
	INTERNATIONAL FOUNDATION STUDIES	45	6
	INTERNATIONAL MASTERS PREPARATION	16	
<b>LAW</b>	B LAWS	9	7
	B LAWS (GRADUATE)	1	3
<b>MEDICAL LABORATORY SCIENCE</b>	B MEDICAL LABORATORY SCIENCE HONOURS	12	11
	M MEDICAL LABORATORY SCIENCE	43	59
<b>MEDICINE</b>	M AEROMEDICAL RETRIEVAL	3	
<b>MIDWIFERY</b>	B MIDWIFERY		1
	M MIDWIFERY	1	
<b>NON AWARD</b>	INTERNATIONAL EXCHANGE		10
<b>NURSING</b>	B NURSING	72	113
	M NURSING PRACTICE (PRE-REGISTRATION)	168	132
<b>NUTRITION &amp; DIETETICS</b>	M DIETETICS	1	2
	M NUTRITION	3	7
<b>OCCUPATIONAL THERAPY</b>	M OCCUPATIONAL THERAPY	8	13
<b>PARAMEDICINE</b>	B PARAMEDICINE	1	
<b>PHARMACY</b>	M PHARMACY		4
<b>PSYCHOLOGY</b>	B PSYCH SCIENCE	15	8
	B PSYCH SCIENCE (HONS)		1
<b>PUBLIC HEALTH RESEARCH</b>	GRAD CERT DISEASE PREVENTION AND CONTROL	3	2
<b>PUBLIC POLICY</b>	M PUBLIC POLICY	22	13
<b>RESEARCH</b>	DOC PHILOSOPHY (IAS)	92	101
	M RESEARCH (IAS)	4	6
<b>SOCIAL SCIENCE</b>	B ARTS	16	3
<b>SOCIAL WORK</b>	B SOCIAL WORK	57	50
	DIP SOCIAL CARE	3	
	M SOCIAL WORK	47	57
<b>SPEECH THERAPY</b>	M SPEECH AND LANGUAGE THERAPY	4	7

## Vocational Education and Training International Student Enrolments – by Course 2023 & YTD 2024

		2023	YTD 20..
<b>CERT I - III</b>	CERTIFICATE I IN MARITIME OPERATIONS (COXSWAIN ..	1	
	CERTIFICATE II IN CONSERVATION AND ECOSYSTEM M..		3
	CERTIFICATE II IN ENGINEERING	1	
	CERTIFICATE III IN ACCOUNTS ADMINISTRATION	2	1
	CERTIFICATE III IN AUTOMOTIVE REFINISHING TECHNO..		1
	CERTIFICATE III IN BAKING	2	1
	CERTIFICATE III IN BARBERING	1	1
	CERTIFICATE III IN BEAUTY SERVICES	2	
	CERTIFICATE III IN COMMERCIAL COOKERY	2	
	CERTIFICATE III IN COMMUNITY SERVICES		1
	CERTIFICATE III IN ENGINEERING - FABRICATION TRADE	2	2
	CERTIFICATE III IN HAIRDRESSING	2	1
	CERTIFICATE III IN INFORMATION TECHNOLOGY		1
	CERTIFICATE III IN MEAT PROCESSING (RETAIL BUTCHE..	1	
<b>Total</b>		16	12
<b>CERTIFICATE IV</b>	CERTIFICATE IV IN ACCOUNTING AND BOOKKEEPING		1
	CERTIFICATE IV IN COMMERCIAL COOKERY	36	
	CERTIFICATE IV IN ENGINEERING	1	
	CERTIFICATE IV IN KITCHEN MANAGEMENT	101	98
	CERTIFICATE IV IN PROJECT MANAGEMENT PRACTICE	1	
	CERTIFICATE IV IN WORK HEALTH AND SAFETY	4	1
<b>Total</b>	143	100	
<b>DIPLOMA</b>	DIPLOMA OF BUSINESS		1
	DIPLOMA OF CHILD, YOUTH AND FAMILY INTERVENTI..		1
	DIPLOMA OF HOSPITALITY MANAGEMENT	14	40
	DIPLOMA OF LEADERSHIP AND MANAGEMENT	2	
	DIPLOMA OF WORK HEALTH AND SAFETY	1	1
<b>Total</b>	17	43	
<b>NON-AWARD</b>	4WD OPERATIONS ON UNSEALED ROADS	11	6
	4X4 OPERATIONS	3	
	AGRICULTURAL CHEMICAL SKILL SET	9	1
	ATV, UTV AND BIKES	1	
	BARISTA TRAINING		5
	BASIC COOKING SKILLS FOR TOUR GUIDES		1
	COURSE IN ELECTRICIAN - MINIMUM AUSTRALIAN CO..	1	
	DANGEROUS GOODS		1
	EMERGENCY RESPONSE WARDEN		1
	FOOD SAFETY SUPERVISION SKILL SET	30	10
	HEAVY VEHICLE DRIVING SKILLS	15	5
	KAKADU KNOWLEDGE FOR TOUR GUIDES	6	1
	LICENCE TO DRIVE A HEAVY RIGID VEHICLE	2	2
	LICENCE TO DRIVE A LIGHT RIGID VEHICLE		1
	LICENCE TO DRIVE A MEDIUM RIGID VEHICLE	1	3
	LICENCE TO OPERATE A BOOM-TYPE ELEVATING WOR..		1
	LICENCE TO OPERATE A FORKLIFT TRUCK	6	2
	NT WHITECARD	30	15
	NTCA INDONESIAN PASTORAL PROGRAM	20	4
	OPERATE AND MAINTAIN CHAINSAWS	9	
	PROVIDE CARDIOPULMONARY RESUSCITATION	4	
	REFRIGERANT HANDLING LICENCE - AUTOMOTIVE AIR ..		1
	RESPONSIBLE SERVICE OF ALCOHOL		1
	RESTRICTED ELECTRICAL	1	2
	SNAKE ID, CAPTURE AND RELOCATE		1
	TRAFFIC MANAGEMENT WORK ZONE 2 & 3	6	
	ULURU & KATA TJUTA KNOWLEDGE FOR TOUR GUIDES	9	
	ULURU-KATA TJUTA KNOWLEDGE FOR TOUR GUIDES	14	21
	WORK SAFELY AT HEIGHTS	3	
	<b>Total</b>	181	85
	<b>Grand Total</b>	<b>357</b>	<b>240</b>



## 5. International student revenue

Fee-Paying onshore overseas students revenue as reported in our annual statements is as follows:

	Current International Student Revenue						
	2018	2019	2020	2021	2022	2023	2024*
	\$	\$	\$	\$	\$	\$	\$
Fee-Paying onshore overseas students	36,420,000	37,896,000	50,619,000	48,123,000	44,697,000	74,621,000	67,682,000
<b>Total</b>	<b>36,420,000</b>	<b>37,896,000</b>	<b>50,619,000</b>	<b>48,123,000</b>	<b>44,697,000</b>	<b>74,621,000</b>	<b>67,682,000</b>

The 2024 full-year forecast is based on the revised 2024 budget, with the projected figures estimated using Census 1 student enrolment data.

In 2023, CDU introduced a new fee structure that significantly reduced student fees. This discount resulted in a cost of \$22.5 million, which is reflected as an expense in the financial statements.