

Additional notes to the Department of Education and Training, Western Australian Submission

Section 1: Background on the Western Australian industry

In 2004, a report, commonly known as the Lawrence Report was commissioned by Perth Education City (PEC). It demonstrated to the Western Australian Government that international education was a \$1.1 billion per year industry for this state. PEC has 32 members which recruit around 96% of the 36,000 international students in WA. In 2004 there were 132 organisations registered to enroll international students, although not all were active.

Currently in DET institutions there are approximately 2300 international students.

Section 2 Key Challenges

The Key Challenges in the DET submission are applicable to all organisations be they Government, independent or private, large or small. These 11 Key Challenges have been collected into themes and issues.

First theme is POLICY AND PROCEDURES

The Key Challenges covered are 2.1, the last section of 2.3, 2.4, and 2.7.

- Currently Australia has the highest student visa fees by far of New Zealand, United Kingdom and the United States.(2.1)
 - New Zealand: AUD 170
 - United Kingdom AUD 212.50
 - United States Visa AUD 129 plus SEVIS fee of AUD 129 (Student and Exchange Visa Information Service – PRISMS) Total AUD 258
 - **AUSTRALIA** AUD 430 plus Permission to Work AUD 60 **TOTAL AUD 490**
- Not only are visas more expensive but the application process, especially the time to obtain a visa, does not compare with our competitors.(2.7)

The application process, especially the **time to obtain a visa**, does not compare with our competitors. Comments by agents:

 - 2006 For UK applied for in China, same day
 - 2004 For US visas applied for by nationals in UAE, 24 hours
 - Current Australia 1-3 months usual and up to 6 months depending on the process eg PVA

Students from Assessment Level 3 and 4 countries such as Vietnam and China are therefore paying a premium price for the privilege of waiting sometimes extensive periods for a student visa!

- In many cases policy is seen both locally and internationally as being made on the run. Indecision and complexity are the hallmarks of the Department of Immigration (and Citizenship) DIAC, and the Department of Education Science and Training DEST. (2.3, 2.4). Much of this is due to the lack of real consultation and understanding the industry. One effect is that agents are sending students to other countries.
 - There are several recent examples from both DIAC and DEST. The classic has been the English language conditions applied by DIAC on students applying for the School Sector visas from China. It has resulted in a significant reduction in enrolments from China.

Over two and a half years ago DIAC introduced the requirement that students applying for schools reach a desired standard on an IELTS test. This caused concern in the Sector at the time because IELTS was, and still is, an inappropriate test for school students as it is a test designed initially for postgraduate and the redesign for undergraduate students.

Ultimately, and I must add, after some time, DIAC allowed a two year waiver under certain conditions and for other approved tests to be used. This caused wide spread confusion in China and resistance from the students to comply with any sort of testing. Chinese school students found it easier to enrol in other countries. The situation is still not resolved, and the waiver is still in place. Chinese students that do come to Australia are selected on their achievements in English at their school level which had always been the practice and is working well. While the need for quality checks to be in place is seen as necessary and desirable “real” consultation with the industry prior to announcements rather than after the event in a “clean up” mode is essential.

- **Consultation** – there is a difference between consultation and collaboration. From the WA viewpoint the selection of some “advisory panels/committees is not representative of the industry Australia wide. Submissions as part of a consultation process have not changed anything. It is almost that the outcome has been decided.
- **Arrogance** – The launch of the Student Visa Reforms by DIMIA (now DIAC) in May 2001 is a classic example. Briefings were announced in Canberra over several days. Being such a significant change at least 15 people from WA wanted to attend and if held in Perth many more. Perth Education City proposed that all expenses be paid for the presenters to travel to Perth (Education Adelaide I believe did the same). Answer NO –either come to Canberra or miss out. The cost of 15 travelers at \$1000 each - \$15,000!! While attitudes have softened over the years DIAC still appear autocratic with their decision-making processes.
- The **overseas response to the change in Visa regulations** was that a significant number of agents said this was all too hard and diverted students to the UK or NZ. This was particularly the case in Assessment Level 3 and 4 countries like Vietnam and China. In fact at the time from memory New Zealand relaxed its visa conditions resulting in significant enrolments.
- There is an inability on the regulators (DEST) to act on institutions “not doing the right thing”. As a result all genuine institutions suffer from over regulation.
 - One problem is that there are different regulators acting in different ways in each state. Some appear more rigorous than others. We are fortunate in WA with a strong regulatory body and a state act the ESPRA Act.
 - When issues arise the approach by DIAC and DEST is to tighten the rules for all institutions. There appears little or no selective action against defaulting institutions. No matter how credible you are you have to meet the new conditions. At one stage (around late 2002) we at the College I was at, were just hoping for the changes to stop, or at least slow down.
 - There is little apparent monitoring of standards other than the registration review. Consider the “sample” of advertising used by one institution.
- DIAC overseas posts are not applying policy and procedures consistently.
 - There was a case in a consulate around 5 years ago where a local visa staff member applied their own conditions. It was extremely difficult to change the persons attitude and things only changed when the person left the position.

- This year a situation in another Consul General's Office occurred where the wrong interpretation of the visa conditions was applied. The issue was referred to Canberra and is now resolved.
- Transparency in how the Visa application process is applied is still not there. There is a need for thorough training and updating of all staff involved. Institutions should not have to fight to ensure the rules are applied correctly.

The second theme is RECOGNITION AND PROMOTION OF AUSTRALIAN QUALIFICATIONS OVERSEAS.

The key Challenges covered are 2.8 and 2.10.

- The major focus should now be on the Vocational Training and Education VTE sector.

The third theme is REFOCUSING EDUCATION SERVICES TO INCLUDE ALL SECTORS.

The Key Challenge is 2.9.

- Traditionally academic courses, particularly university level courses, have in the past gained the most prominence with any promotion of the education export market.
- Greater recognition should be given to the Schools, ELICOS and VTE sectors.
- Promotion support to these sectors, all traditionally with smaller enrolments than universities, needs to be considered. There is some confusion between the roles **AEI** and **Austrade** play in conducting overseas exhibitions. Also there is a problem in that both agencies charge large fees to attend, effectively eliminating the attendance of smaller institutions.
- Other Australian education products such as pedagogy, curriculum, school management, are in demand and need to be promoted.

The fourth theme is INCREASED NATIONAL COHESION AND SUPPORT FOR OVERSEAS PROJECT WORK.

The key Challenge is 2.3.

- Identifies the advantage of a collective arena.
- Priority for Australian aid funds to remain with Australian owned managing contractors.
- Easier access to Commonwealth support in developing the skills needed to conduct this type of business.

Issues

After the four themes Key Challenges become a number of individual issues which should be considered.

2.2 The Media

Overseas reporting of education issues be they opinion or fact is a major problem. The Federal/State debate on education quality is likely to affect student enrolments.

2.5 Strong Australian Dollar

Link this with visa fees, costs of courses, and living and Australia becomes less competitive when compared to the UK.

2.6 Overseas governments policies

Restrictions create the opportunity for offshore delivery of courses.

2.11 Free trade agreements

There is a need for a greater focus on the education and training industry in all negotiations.

Section 3 Positive Steps

Four (4) positive steps are detailed.

It is interesting that the initiative 3.3, the Education Agent training Course, was initiated by a private institution in Brisbane in conjunction with AEI.

Also 3.4, the Schools sector strategy is now at report stage, after many years of inactivity.

Section 4 Conclusion

Four (4) statements are made. They are self explanatory.