

Consultation Paper: Growing International Education in Regional Australia

About ISCA

The Independent Schools Council of Australia (ISCA) is the national peak body representing Independent schools. It comprises the eight state and territory Associations of Independent Schools (AISs). Through these Associations, ISCA represents a sector with 1,135 schools and 616,174 students, accounting for approximately 16 per cent of Australian school enrolments.

Independent schools play an important role in the provision of high-quality school education in Australia. ISCA's main role is to bring the unique needs of Independent schools to the attention of the Australian Government and to represent the sector on national issues.

ISCA represents a diverse sector of non-government schools serving a range of different communities. Many Independent schools provide a religious or values-based education. Eighty-five per cent of all Independent schools have a religious affiliation. Other Independent schools promote a particular educational philosophy or interpretation of mainstream education.

Independent schools include:

- Schools affiliated with 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.

Many Independent schools have been established by community groups seeking to meet particular needs. Examples include the Independent community schools for Indigenous students in remote areas, special schools for students with disabilities and boarding schools to educate children from rural and remote areas. There are also schools that seek to reflect the religious values of a particular community or that seek to practise an internationally recognised educational philosophy, such as Rudolf Steiner or Montessori schools. Independent Catholic schools are a significant part of the sector, accounting for eight per cent of the Independent sector's enrolments.

Most Independent schools are established 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 Lutheran systems. Systemic schools account for 18 per cent of schools in the Independent sector. Four out of five schools in the sector are autonomous non-systemic schools.

On matters relating to international education, ISCA also represents the interests of the National Catholic Education Commission, encompassing the entire non-government school sector.

Independent schools and overseas students

The latest PRISMS data shows that there are nearly 26,000 overseas students currently enrolled in Australian schools. These students comprise 3% of the total overseas student cohort.

Of the school sector total, nearly forty per cent or just over 9,000 of these students are enrolled in non-government schools. Based on 2018 Non-government School Census data just over 340 Independent schools enrolled full fee-paying overseas students.

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.

In the international education context, the schools that ISCA represents:

- are not-for-profit,
- have education as their primary purpose,
- are in receipt of government funding and therefore are already highly regulated and accountable to governments,
- demonstrate financial viability as an accreditation attribute under existing regulatory arrangements, and
- generally, enrol a small percentage of international students compared with their overall student cohort.

Overseas student enrolments in Independent schools vary from 1 to over 200 overseas students. The median number of overseas students at an Independent school is currently 8 students.

This profile differs quite substantially from other sectors. For most Independent schools, overseas students do not determine the school's sustainability. Rather, overseas

students provide a much-valued international element and diversity to school populations.

Independent schools and overseas students in regional Australia

Based on the 2018 Non-government School Census data, 734 (65%) of Independent schools are located in metro areas, and the remaining 389 (35%) are located in non-metro areas.

According to the Non-Government School Census, 83% of Independent schools with full-fee paying overseas students are located in metro areas with 88% of students. Seventeen percent of Independent schools with full fee-paying overseas students are located in non-metro locations and enrol 22% of full-fee paying overseas students in the Independent sector.

Consultation Paper: Growing International Education in Regional Australia

ISCA welcomes the focus of the Consultation paper on growing International Education in Regional Australia. ISCA also notes that Independent Schools Queensland has made a substantial submission in response to the Consultation Paper which speaks to their on-going involvement in both international education and the high levels of engagement in Queensland in developing and supporting regional education. The ISQ submission is representative of the efforts of ISCA, Associations of Independent schools and the broader non-government school sector and is supported by ISCA.

1. How can government, institutions and communities better promote the valuable and unique experience of studying and living in regional Australia?

It is imperative that any efforts aimed at promoting the valuable and unique experience of studying and living in regional Australia are based on extensive research and understanding of the potential cohorts of students that would be interested in studying in regional destinations.

To do this, it is also important that the offerings of regional destinations, and areas of attraction, are clearly understood. This will require consultation at the local level to identify programs and courses, potential partnerships between a range of stakeholders, and to ensure community engagement and collaboration.

Any attempts to grow international education in non-metro areas need to be sustainable. Sustainability must be at the core of any strategy to grow engagement in this area.

2. What are the barriers to regional destinations and their education institutions hosting more international students?

There are a range of significant barriers to regional destinations hosting more international students. The ISQ submission list a range of barriers to regional engagement including;

- A lack of understanding of the benefits of international education

- Limited capacity to support students from non-English speaking backgrounds
- Limited accommodation options
- Access to safe and affordable transport
- Limited experience of smaller providers in international education

One of the key issues for Independent schools more generally is the regulatory burden, cost and compliance regime that comes with CRICOS registration. There is an imperative to balance the legislative requirements on providers and the desire to provide more opportunities for providers to engage in the provision of education to overseas students.

3. How can metropolitan and regional education institutions work together to create regional study opportunities for international students in ways that benefit the students, the regional communities and the institutional partners?

There is significant potential for a range of partnerships including between metro and non-metro providers, providers from different sectors and education providers and other institutions, including businesses. What is important is how any possible partnerships can be facilitated in a way that will create viable opportunities for students and communities.

This could possibly be done through a mechanism like the current Austrade Market Information Package which allows providers to see engagement opportunities offshore. Any mechanism for engaging regional providers would need to be free of charge, given that current engagement levels are minimal in many areas.

4. What are the best ways to communicate the benefits of spending time in regional Australia to prospective international students and their parents?

Many schools have found that the best way to communicate the benefits of spending time in regional Australia to prospective international students and their parents is through the testimonials of current or previous students. This would not have to be limited to students on student visas.

5. Given the strong interplay between tourism and education, particularly in regional settings, how can government, institutions and the community capitalise on the relationship, map its value and promote regional strengths?

There is value in looking at the interplay between tourism and education in regional settings however this would need to be accompanied by an analysis of the potential benefits vs any potential investment. There would need to be close examination of what attractions there are, who may be the target audience and the likelihood of translating that into some form of international engagement balanced against the cost of increased and / or targeted advertising, for example.

The ISQ submissions includes a comprehensive list of risk factors that would need to be considered if combining tourism with education more directly, such as study tours. Many schools are already heavily engaged in the provision of study tours and have significant expertise in this area that could be shared with other schools and education providers.

6. *What role could fee structures and scholarships, education agent promotions, and changes to government policy settings play to encourage more students to study in regional Australia (e.g. migration incentives)?*

The benefits of incentives as outlined above need to be balanced against the need to create sustainable international education offerings. Unless the provision of international education in regional areas is grass roots activity, with the full engagement of the provider and the community then promotions will not make much difference in the long term.

However, ISCA does see the potential for changes in government policy settings to make it easier and less burdensome, both administratively and financially, for non-government schools to participate in international education.

This issue was noted in the Senate Select Committee on Red Tape *Interim Report Effect of red tape on private education*¹ in response to submissions by the Independent Schools Council of Australia (ISCA) and other peak bodies:

Some submitters and witnesses argued that there are regulatory differences between the public and private education sectors which result in a greater regulatory burden on private providers. ... For example: ...

ISCA highlighted the need for each private school to be a registered provider under the ESOS Act, compared to education departments whose single registration covers all public schools in their jurisdiction; (p.21)

As noted above, Independent schools that are individually registered and individually responsible for meeting compliance requirements. State and Territory Departments of Education hold one provider code and can benefit from economies of scale, centralised recruitment procedures, policies, exemptions to Entry to Market Charges and the risk rated component of the TPS levy.

Further, non-government schools are already subject to multiple layers of regulation under state and territory as well as Commonwealth legislation. The ISCA submission noted that:

[There is] no mechanism or agency oversight to ensure consistency of application of ESOS regulation across states and territories. Previous [attempts to streamline] ESOS have yielded some small results after long periods of consultation and effort but have generally advantaged other sectors to a far higher degree than schools ...

... international education as an area in which that [one size fits all] approach has inadvertently and adversely burdened schools, discouraging them from entering or expanding into the international education market. (p.18)

¹https://www.aph.gov.au/Parliamentary_Business/Committees/Senate/Red_Tape/PrivateEducation/~media/Committees/redtape_ctte/PrivateEducation/Interim_Report/report.pdf

7. *Is there a need for greater insights into the motivations and the experience of international students in regional areas relative to metropolitan areas, using survey instruments and other targeted research?*

The need for research in this area to ensure the sustainability of any efforts to increase international engagement in regional Australia has already been noted in this submission. As the ISQ submission notes, there is the need for specific location-based research in addition to broader research on larger questions such as why overseas students might choose to study in regional Australia. Local research would be required to ensure that a regional area is able to attract and support increased engagements in a sustainable and on-going way.

ISCA
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