15 June 2012

Mr Michael Chaney AO
Chair, International Education Advisory Council
By email: ieac@innovation.gov.au

Dear Mr Chaney

Developing an International Education Strategy for Australia: Discussion Paper

The University of Sydney welcomes the opportunity to make the attached submission to the International Education Advisory Committee (IEAC) strategy development process.

The establishment of the IEAC is a most welcome development. The University is keen to work with the Council, governments and other education providers to ensure that we can sustain international education as a vital part of Australia's education system and economy for the long term.

We were delighted to see the recognition in the Discussion Paper that Australia's long term attractiveness to international students will depend on the quality and value of the overall education experience we offer. The recognition of the relationship between research excellence, the reputations of a country's leading universities, and demand from international students was also welcome. The appreciation reflected in the paper that the benefits of internationalisation extend far beyond simple economic returns was also encouraging.

We certainly hope that the IEAC will be able to play a role in achieving improvements to the longstanding problems of international students' access to public transport concessions, health care, affordable accommodation, and work-based training. Conventional approaches to these seemingly intractable problems do not appear to have worked. New strategies are needed and we hope that the IEAC can cut through the apparent jurisdictional obstacles to effect meaningful improvements on all of these fronts. We also hope that the IEAC will have the influence required to see improvements in levels of foreign language acquisition by young Australians, domestic student mobility and enhanced support for international research collaboration.

However, while addressing these issues is important, we also strongly urge the Council to delve into the complex domestic teaching and research policy and funding challenges that must be dealt with if we are to ensure the long term quality and competitiveness of the Australian higher education sector. For example, we fear that the once in a decade opportunity presented by the recent Higher Education Base Funding Review and the Gonski Review of Funding for Schools to achieve lasting reforms to the funding of Australia’s universities and schools respectively may be slipping away. Achieving reform to funding arrangements for both systems will be simply fundamental if we are serious about
securing the future of the Australian education sector and strengthening its capacity for internationalisation.

Much of the extraordinary success in international education achieved by Australian educational institutions over the last 20 years can be attributed to the relative freedom to operate in this market that providers have had.

While there is no doubt that the events of 2009 required a tough regulatory response to assure quality and restore confidence in the sector, it is fair to say that the actions of relatively small number of providers have damaged the reputation of the sector as a whole, and resulted in the imposition of an onerous and costly regulatory regime for all providers regardless of their risk profiles.

It was certainly necessary for government to tighten its approach to regulation and sever the link between study in Australia and a migration outcome. Nevertheless, we urge caution in the IEAC recommending further interventions by government, for example, to set institutional targets for international student numbers, or to establish a single government agency responsible for the coordination, marketing and promoting of Australian international education.

We look forward to engaging with the IEAC as its work progresses and stand ready to provide further information as required.

Yours sincerely

Signature withheld for electronic distribution

Michael Spence
The University of Sydney welcomes the opportunity to make a submission to the IEAC’s International Education Strategy Discussion Paper “the Discussion Paper”.

Our comments build on the contributions we have made to recent federal and state government processes relevant to the internationalisation of the Australian higher education sector, including the:

- Senate Education, Employment and Workplace Relations Committee Inquiry into the Welfare of International Students – August 2009
- House of Representatives Standing Committee on Industry, Science and Innovation Inquiry into Australia's International Research Collaboration - Jan 2010
- Department of Immigration and Citizenship Review of the General Skilled Migration Points Test - March 2010
- Department of Innovation, Industry, Science and Research Workforce Australia Strategic Review - August 2010
- Lomax-Smith Review of Higher Education Base Funding - March 2011
- Knight Review of Australia’s Student Visa Programme - April 2011
- NSW Parliament Legislative Assembly Social Policy Committee International Student Accommodation Inquiry - October 2011
- Moore and Dyer Review of the NSW Planning System – March 2012
- Henry Review of Australia in the Asian Century – March 2012
- NSW Department of Trade and Investment - International Education and Research Industry Action Plan - March 2012

We encourage the IEAC to consider these past submissions, each of which addressed one or more of the themes and questions raised by the IEAC Discussion Paper. There are, however, a few key points arising from this Discussion Paper that we would like to emphasise. Our comments below are provided under numbered headings that correspond with the sections of the Discussion Paper.

In summary, we strongly support the development of national strategy for the internationalisation of the Australian education rather than the more limited notion of an international education strategy. We feel that much good progress has been made on many fronts since the events of 2009 to assure quality through enhanced regulation and reforms to relevant migration laws and processes. We support the recent reforms, for example, to the general skilled migration points test, to the post qualification work rights for international students graduating from Australian universities and the introduction of streamlined visa processing for university applicants. The various steps that have been taken to improve the coordination of activities between agencies and jurisdictions have also been encouraging. We are pleased to see the recognition in the Discussion Paper that the benefits that flow from international education go far beyond economic returns, that internationalisation is now fundamental to the missions of many Australian universities, and that the key to our long term competitiveness in the market for international students and researchers will be the quality of our education products and the overall life experience that we offer. Therefore, while we recognise the need for action to further improve coordination to address a range of immediate challenges, we also urge the IEAC to play a role in
achieving meaningful reform to the underlying policy and funding settings that support Australian higher education and research.

We raise concerns about emerging challenges in the area of workplace training for international students, particularly in the health disciplines as a result of the largely unplanned growth in domestic student enrolments that is occurring as a result of the introduction of demand-driven funding and the government’s efforts to address workforce shortages. This growth is placing increasing pressure on the supply of quality clinical training places with potential negative implications for access to workplace training by international students. While we certainly support the need for improved coordination of the national approach to international education, we conclude by urging caution in relation to the proposal raised in the Discussion Paper that a new government agency, modelled on Tourism Australia, be established with broad ranging responsibilities for coordination, marketing and promotion. We offer some alternative ideas for improving Australia’s marketing of international education, and tapping into existing alumni networks more strategically to deepen levels of international engagement.

Background (p.4)

Build on strong progress to date
We welcome the significant progress that has been made since 2009 on a number of important fronts, largely as a result of the above policy processes. In particular, arising from the Knight Review we welcome the establishment of the IEAC to provide the Australian Government with strategic advice about internationalisation issues, as well as the creation of the interdepartmental forum of relevant Commonwealth agencies to improve communication and coordination of the Government’s efforts across relevant portfolios. We are particularly pleased to see the private sector represented strongly on the Advisory Council, as well as the perspectives of the higher education sector, and those of the research community more broadly through the inclusion of the Chief Scientist. We also welcome the improvements that have been achieved to date in the Department of Immigration and Citizenship’s (DIAC) provision of data about trends in student visa applications and approvals, and the efforts it has made to communicate and consult with the sector about the implementation of the Knight Review reforms.

It is still too early to judge the impact of measures such as the Council of Australian Governments’ (COAG) International Student Strategy; the regulatory and quality assurance reforms through the Educational Services for Overseas Students (ESOS) and Tertiary Education Quality and Standards Agency (TEQSA) legislation; the reforms to the general skilled migration points test; the introduction of streamlined visa processing for university applicants; and the changes to post qualifications visa work rules. Though some of these changes have brought with them additional compliance and administrative requirements for all providers regardless of risk profiles, they are generally positive steps, which should in time serve to increase the attractiveness of Australia as a study destination for international university students. With these initiatives at various stages of implementation, the IEAC’s strategy development process provides a welcome opportunity for an independent expert body to take an objective look at the emerging data and the implementation of the various reforms to date with a view to identifying gaps, recommending priorities for action and mechanisms to further enhance coordination.

International education in a changing world (p.5)

Underlying principles
We are very pleased to see the recognition in the Discussion Paper that the benefits that flow to Australia from the internationalisation of its educational system extend far beyond the economic; that Australia is now engaged in a maturing third phase of educational internationalisation
characterised by *deep collaboration* between institutions and individuals directed towards achieving mutual benefits; and that the long term competitiveness of our education institutions will depend on the *quality* of their offerings, and the overall value of the educational and broader experiences that studying at an Australian institution provides all students and researchers. These underlying principles are consistent with the emphasis we have given repeatedly in our submissions to the various recent policy processes noted above. They also align with the approach to internationalisation that we are pursuing as a core component of our Strategic Plan 2011-15.\(^1\) We are therefore pleased to see the Discussion Paper provide a rather nuanced appreciation of the complexities and interdependencies of the challenges that must be addressed if Australian higher education is to maintain a strong international dimension in the face of changes in market conditions and heightened levels of international competition.

If the IEAC can frame its strategy development around the need to facilitate *broad benefits, deep collaboration*, the *quality* of our institutions and the overall student experience, we are confident that its advice to the Government will be sound. Additionally, recognising that the success in internationalisation achieved by the Australian higher education sector to date has occurred in an environment characterised by limited government regulation and direct involvement, the principle of *proportionality* should also underpin the IEAC’s thinking about whether Government intervention is needed in any particular area of activity. Maintaining an approach to government involvement that is as light touch as possible, and *facilitative* rather than *restrictive* will be the best way to ensure that diverse Australian higher education providers remain internationally competitive.

**Emerging issues**

**Linkages with underpinning policies for higher education and research**

There is a tendency in discourse about *international education* to treat it as a separate ‘sector’ or ‘industry’, the health of which can somehow be addressed in isolation from dealing with the policy and funding challenges confronting Australia’s education, research and innovation system as a whole. Over the past twenty five years Australian universities have typically pursued strategies to grow their international student numbers in areas of strength and demand. At Sydney for example, our international student numbers grew some 769 per cent from a low base between 1990 and 2010, such that we now have more than 10,000 international students representing 22 per cent of total enrolments, and plan to maintain these numbers somewhere between 20 and 30 per cent.

Such growth has occurred partly in response to deliberate policies of successive Australian governments, which have encouraged institutions to be entrepreneurial in seeking out alternative sources of income. It has also been driven (or at least facilitated by) the rapid trend towards globalisation of education and research, economic development (particularly in Asia), improvements in the speed and affordability of international travel and communications technology, and favourable migration and visa policies. As a result, providing an educational environment where domestic and international students and researchers from diverse backgrounds learn and work together has become simply fundamental to our mission as a globally competitive, distinctly Australian university.\(^2\) International students and researchers are now vital and equal members of the University community. International collaboration is core to much of our teaching and research, while we seek to prepare all of our students for roles as global citizens for the benefit of Australia and the wider world.

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As a result of these trends, like many Australian universities, we are now highly dependent on international student fee income to deliver our core teaching and research activities. In 2011 some 17 per cent of our revenues ($277 million) came from international student fees. Yet, as the Discussion Paper emphasised, market conditions have changed dramatically, perhaps irrevocably over the last five years, while key indicators of likely levels of future demand for places in Australian universities (e.g. Vocational Education and Training (VET) and English Language Intensive Courses for Overseas Students (ELICOS) enrolments) are showing concerning trends for the next few years.

Time will tell whether developments in the global economy and the implementation of the various reforms noted above, will see a return to growth in demand for Australian higher education from international students in the short term. Longer term, we are concerned that while the Discussion Paper noted the vital link between ensuring quality and the continuing attractiveness to international students, there was little discussion of the underpinning role that domestic funding policies must play if Australia is to sustain a system of diverse, high quality universities for the long term. While the Discussion Paper touched on the Government’s reforms to regulation and quality assurance through ESOS and TEQSA, no mention was made of the funding dimension of quality, or of the links between funding for university teaching, research excellence and sustainable internationalisation. We encourage the IEAC to engage with these complex domestic policy and funding issues to ensure that its advice to Government is comprehensive.

For example, unless we can find a way to address the findings of the Higher Education Base Funding Review about the inadequacy of base levels of funding per domestic student, and the risks of perverse outcomes posed by the introduction of demand-driven funding, it is likely that international competitiveness of Australian research intensive universities will become increasingly compromised. As has been noted by the Discussion Paper, the Australia in the Asian Century Review and the Higher Education Base Funding Review, there are strong interdependencies between research collaboration, research performance, university rankings, institutional reputations and attractiveness to high quality international students. Enhancing domestic student mobility and increasing international research collaborations are important issues, which we have addressed in some detail in recent submissions. But it is arguably more important that any internationalisation strategy has regard for the capacity of the underpinning policy and funding settings that are required to support a strong national research and innovation system.

We are also concerned that recent Government decisions to end support for university and major national research infrastructure and the International Science Linkage program suggest an absence of any long term strategy for supporting research excellence. These developments suggest an apparent lack of appreciation of the implications of cutting university research funding in an environment already characterised by heavy cross-subsidisation from teaching and learning revenue streams. Every dollar of income earned from teaching and learning activities that is spent on research is a dollar that is not available to invest directly in the quality of teaching and the broader student experience, to offer scholarships to international students and low-SES students, or to assist domestic students with mobility to spend part of their studies overseas. Yet the challenge research intensive universities face is that a failure to invest in research could, in time, impact upon their global rankings and reputations, with flow on effects for the rest of the sector.

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4 Submissions to the Australia in the Asian Century Review and the Parliamentary Inquiry into Australia’s Research Collaborations.
Demand-driven funding and access to workplace training for international students

Members of the IEAC may be aware of recent press coverage about the difficulties that graduating international medical students continue to face in securing the internships required to complete the mandatory requirements for professional registration. While at present the shortage of medical internships mostly affects international students, growth projections for medical graduates resulting largely from new medical schools coming on line, mean that there may soon be insufficient places to accommodate large numbers of domestic graduates as well. This is an international education issue of significant concern in its own right, because of the potential loss to Australia of graduates in a high cost field of identified workforce shortage and the potential financial impact for institutions.

A broader and longer term risk is that we will soon start to see similar problems arise in the national capacity to provide international students in diverse health fields with quality clinical training placements during their studies. This could occur because of the unprecedented growth in domestic student numbers in many health disciplines that is currently underway as a result of the Government's demand-driven funding reforms and the push being led by Health Workforce Australia (HWA) to expand graduate numbers in many disciplines to address areas of workforce shortage. According to HWA, across all health profession courses, Australian universities plan growth between 2009 and 2014 of 26,500 students or 28 per cent. Already in NSW we are aware of some disciplines facing increasing difficulties securing sufficient clinical training days for their students to satisfy mandatory course requirements. Our fear is that in an environment where demand for clinical placements may soon far outstrip supply, access for international students will become restricted, or will be provided only on a fee for service basis. Reforms to the funding models for the provision of clinical training in public health systems currently under development as part of the COAG National Health and Hospitals Partnership Agreement are also likely to bring a heightened focus on the currently ‘unfunded’ costs of clinical training. Additionally, institutions that do not have high research costs to cross-subsidise will be better placed than their research-intensive counterparts to operate in a fee for clinical training environment. With the Base Funding Review identifying medicine and other health disciplines as under-funded for the university component of costs alone, and many of our health faculties and schools reliant on income from international students to meet the gap, this would be a very challenging outcome for the University of Sydney indeed.

While we have focused here on emerging issues in access for international students to quality clinical training in the health disciplines, there is every possibility that the unconstrained growth in domestic university enrolments that has been allowed by demand-driven funding will soon start to place pressure on the availability of workplace training in other disciplines. International graduates often report difficulties obtaining paid employment in their fields of expertise upon graduation. It is arguable that some international students require more and better access to work-based training to maximise their prospects of making a smooth transition to paid employment in their field upon completion of their studies. Ensuring international students have fair access to high quality work-based training during the course of their studies is one emerging issue that we feel the Government and sector would ignore at their peril. There is a need for this issue to be approached carefully as part of any national strategy for internationalisation of the Australian higher education sector. We believe that much can be achieved if governments state and federal, the higher education sector, business and the professions can be brought together to plan strategies to address these emerging challenges.

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A vision for Australian international education (p.12) & A national strategy for international education (p.12)

We strongly support the development of a vision statement for Australia’s international education, along with a national strategy to guide the pursuit of the vision once agreed. We would suggest a shift in terminology, however, from international education to internationalisation to ensure that both the vision and strategy are broader and deeper than a simple focus on Australian institutions educating foreign students. The development of an internationalisation strategy for Australian education would be consistent with the recognition evident in the Discussion Paper of the complex nature of international engagement in education and research, the breadth of the benefits that flow from deep levels of engagement, and the importance to Australian society and the economy of the population being internationally connected, outward looking and culturally aware.

For the information of the IEAC we provide the University of Sydney's Statement of Purpose, which we feel aligns well with the broader vision and strategy the Council appears to be seeking to develop:

We aim to create and sustain a university in which, for the benefit of both Australia and the wider world, the brightest researchers and the most promising students, whatever their social or cultural background, can thrive and realise their full potential.

Theme B: A positive and rewarding student experience as a driver for long-term engagement (p.16)

Notwithstanding that the vast majority of International students continue to report high overall levels of satisfaction with their experience studying in Australia, issues such as equitable access to transport concessions, access to high quality and affordable health care and accommodation, and safety have been of concern for many years. These problems have been growing in significance recently, particularly in some states and metropolitan areas, and in some cases have received damaging media attention. As noted above, we have provided input to various recent reviews and inquiries that have sought to find solutions to these issues. We think it is fair to conclude that while good progress has been made by the Commonwealth in strengthening regulation, improving the student visa system, and improving policy coordination at the nation level, less ground has been made towards addressing these other elements critical to ensuring the quality of the overall student experience. We recognise that the reasons for the lack of progress are complex, and arise in part from the splits and overlaps in responsibility for these issues between Commonwealth, state, and local governments, and providers to some degree. Given the nature of the issues, COAG would appear to have a critical role to play in addressing them. The implementation of its International Student Strategy for Australia is a positive step so long as it is supported by action. In addition, the IEAC might consider recommending the establishment by COAG of time limited taskforces to cut through and ensure that meaningful improvements are achieved within the next five to ten years.

It is also vital that international students enrolled at all levels have strong, democratically elected representatives, and the resources to ensure that they can advocate effectively on behalf of international students at the local, state and national levels. We support the efforts through the COAG strategy to enhance governments’ engagement with international students, along with the establishment of the Council of International Students. The introduction of the Student Services and Amenities Fee at universities from 2012 should in time also increase the capacity of student representative councils to represent the interests of international students on campus and
beyond. We see value in clear and consistent lines of communication being established between governments, providers and international student representatives, with mechanisms put in place to enable timely and meaningful dialogue, particularly in times of crisis. Regular surveys of international students’ views about the quality of their educational and broader experience already exist, and these should continue to be used by providers and governments to monitor trends and identify areas for concern.

While we broadly welcome the Knight Review reforms, and in particular those that will enhance the post-qualification work rules for international university graduates, we question the fairness of expanding these work rights only for new students. While we appreciate that a variety of factors influenced the Government’s decision to restrict access to these reforms, it would send a very positive message to existing students if the eligibility could be relaxed to deliver equal treatment. We urge the IEAC to engage with the Government about the feasibility of making this adjustment.

**Theme D: Offshore education delivery contributes to Australia’s reputation as a provider of high quality and a partner of choice (p.19)**

Any internationalisation strategy needs to have transnational education as an important pillar. Many Australian providers make substantial contributions to regional relationships through offshore campuses or other methods of delivery. Long term, offshore delivery is likely to grow in importance in response to growth in demand for educational infrastructure in Asia, the high Australia dollar and potential decreases in the affordability of international travel. As the Discussion Paper notes, transnational education is not without its risks. There are risks for individual providers but also for the reputation of the Australian education sector as a whole, and ultimately the nation. It is important therefore that the regulation and quality assurance of offshore activities of registered Australian education providers is proportionate and strong where appropriate.

While offshore provision is, by its nature, a competitive field, Australian providers are increasingly competing not only with each other, but with institutions from other countries. Part of an Australian strategy for transnational education could involve encouraging the sharing of experiences and information between Australian providers – particularly when they not operating in direct competition within a particular market. We also see a role for governments and the private sector to work with Australian higher education providers to help identify emerging opportunities for transnational provision, and facilitate processes whereby the most appropriate providers for a given opportunity are provided with advice, market intelligence and other forms of advice. Ideally, the strategy should align with the strategic priorities for international engagement that emerge from the Asian Century review, with seed funding potentially provided on a competitive basis to assist providers to establish offshore presences in locations of strategic priority to the nation.

**Theme E: Promoting Australia as a partner of choice for education and collaboration in the Asian region and beyond (p.20) & Theme F: Preparing Australians for a changing global and economic environment (p.22)**

Five years ago the University of Sydney was closely involved with the development by the Group of Eight universities of the *Languages in Crisis* statement. The statement included the following:
“There is no one quick-fix solution. The current problems have developed over decades and will consequently take considerable time and effort to solve. The National Statement for Languages Education in Australian Schools and the National Plan for Languages Education in Australian Schools 2005–2008 represent a good start but they do not cover languages in higher education and they do not include recommendations for compulsory study of languages.

We need to work together towards a comprehensive policy, a National Policy on Languages, which truly embraces the benefits for Australian society of multilingualism and the learning of languages. If we don’t, then Australia will jeopardise its political security, its cultural harmony and its economic and educational competitiveness.”

The Go8 paper called for the implementation of a range of strategies, which remain valid five years on. We urge the IEAC to consider the Go8 paper of 2007 as it considers options for increasing levels of second language acquisition among Australian young people. We are sure that if there was interest from the IEAC, expert language educators from Australia’s universities would be pleased to engage with the Council.

We agree that enhancing levels of second language acquisition is only part of what is required. Enhanced cultural awareness and understanding is also vital and in this regard universities have much to offer if the resources can be found. For example, at the University of Sydney, we have recently conducted a comprehensive review of our expertise relevant to different countries and regions of the world. As a result of this process China and South East Asia have been selected as the geographic areas for which we will seek to build upon our already considerable strengths to enhance levels of educational and research engagement through the establishment of dedicated China and South East Asia study centres.

Theme G: Strengthening the science and research collaboration of Australian education institutions through international linkages (p.23)

As noted above and in the Discussion Paper, there are linkages between research quality, international research collaboration, institutional and country reputations, and demand from international students. As a relatively small country and contributor to the global research effort, it is arguably more important for Australian researchers to be engaged in international research collaborations, than it is for their counterparts in many other countries. Active participation in international research collaborations raises our international standing as an open and engaged, advanced research nation, willing to contribute its fair share of resources and expertise to address global challenges. It also serves to foster friendly relations and understanding between individuals and nations.

The University of Sydney made two detailed submissions to the 2010 House of Representatives Standing Committee on Industry, Science and Innovation Inquiry into Australia’s International Research Collaboration. The issues we raised there, along with the Committee’s final report remain highly relevant and we draw them to the IEAC’s attention.

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Theme H: Australia's reputation as a provider of high quality education is enhanced through international cooperation and promotion (p.24)

Marketing

The marketing of Australian education internationally too often continues to emphasise Australia as a destination for international students, rather than positioning Australia on the world stage for the quality of its education, research and innovation. Direct marketing to potential students is certainly important, but we know that long term the biggest drivers for international students choosing a university are reputation, influence and outcomes - all of which are well served by broadening the approach to marketing well beyond the student experience. We need to manage and build Australia’s reputation as a provider of high quality education, and a producer of graduates with globally competitive knowledge and skills. If this means directly promoting the international competitiveness of Australia’s best institutions, then this should occur, as from this the students will come and there will be flow on benefits for all providers in the long run.

Our longstanding view has been that efforts by the Australian Government to market international education have generally added little value for this University or the sector overall. This is largely because there is no homogenous international education industry to market, rather a diverse collection of institutions, operating at different levels, in different markets, at different standards of quality, at different stages of development, and with necessarily diverse marketing needs and audiences. Yet our national approach to marketing has too often tended to persist with a ‘one size fits all’ approach to promoting study in Australia. While we certainly support improved coordination when selling Australia as a whole, the strategy also needs to recognise that the market is segmented and students who are looking to study at VET or certain universities will not be the same as those who wish to enrol at a research-intensive university. This is even more apparent when it comes to marketing for postgraduate coursework and research students.

Alumni engagement

International alumni engagement provides an advantage that Australia can use in marketing the international education sector. With a minimum of 300,000 loyal alumni from Group of Eight universities alone residing overseas, alumni of Australian universities can provide an important role as international ambassadors, with access to key networks and influential alumni across the globe. For many years universities have been developing international alumni networks, drawing on them to broaden and deepen levels of engagement with their countries. Over the past three years AUSTRADE and other government agencies (e.g. DFAT via overseas missions, Embassies and Consulates) have been doing the same, and many partnered activities have occurred.

However, there is currently no forum or framework where AUSTRADE, other relevant agencies and Australian universities can interface in order to collaborate. As a result there is duplication of effort and activity. We see significant potential for collaboration and integrated promotion through the establishment of a forum/contact point between Australian universities and AUSTRADE/other government agencies to coordinate these activities. Duplication could be minimised, and opportunities could be established to maximise alumni engagement to benefit Australia’s reputation as a provider of high quality education.

For reasons such as these, we welcome and support the recent steps the Government has taken to improve coordination of various aspects of its involvement in international education. We are sceptical, however, about the value of the proposition of establishing a large, powerful and inevitably costly International Education Commission modelled on Tourism Australia to take responsibility for marketing all levels of Australian education internationally. We would require
much convincing that the creation of such an entity, to be funded by a levy on international students or by taxpayers, would be the most effective way to achieve improved coordination of marketing and promotion of Australian education. In fact, given the fundamental linkages between research and education policy discussed above, we see significant risks that the establishment of such a body with specifically responsibility for one aspect of Australian education, could actually serve to reduce rather than enhance the coordination and integration of relevant government activities.

Enhanced coordination and communication

As we discussed above, in our view the comparatively light touch approach to regulation and intervention in international education taken by successive Australian Governments since the late 1980s, has been an important factor in the extraordinary success achieved by Australian universities expanding provision to international students. Recent events have necessitated a strengthening of regulation and the effective decoupling of the education and migration systems. However, with the enhanced regulatory safeguards now in place, or in the process of implementation, we recommend that rather than establish a new bureaucracy with all that that would entail, the IEAC should monitor developments closely and focus on establishing simple and efficient mechanisms that can build on the various recent improvements to further enhance coordination and communication between agencies, jurisdictions and providers.