

Independent Schools Queensland

Draft International Education and Training Strategy to Advance
Queensland 2016-26

Introduction

According to the Australian Government Commonwealth Register of Courses and Institutions for Overseas Students (CRICOS), there are 305 registered providers in Queensland.¹ Of these, 249 are private providers², 110 of which are non-government schools. Non-government schools thus comprise 36% of CRICOS registered providers in Queensland, and 44% of Queensland's private CRICOS registered providers. 82 of the 111 CRICOS registered school providers in Queensland are independent schools³.

Independent Schools Queensland (ISQ) is the peak body representing Queensland's independent schooling sector. Our 196 member schools are a vital part of the state's education system. Together, independent schools educate almost 118,000 students, or 15% of Queensland's school enrolments.

In 2016, *"...the independent school sector catered for 1,469 full-time equivalent (FTE) overseas student enrolments, an increase of 175 students from 1,294 overseas student enrolments in 2015. This is a 13.5% increase in enrolments in the last year, which is more than double the rate of increase in enrolments that occurred from 2014 to 2015"* (2016 state census data⁴).

In June 2016, Queensland non-government schools accounted for 51.3% or 1,847/3,600 international student YTD enrolments and 46.7% or 952/2,041 YTD commencements in Queensland schools. Nationally, Queensland non-government schools claimed 26% of YTD enrolments in non-government schools, and 10% of international school student YTD enrolments overall. Queensland non-government schools share of June 2016 YTD non-government school commencements was 33% - the highest number of commencements for non-government schools in any state - and 13% of international school student commencements overall.⁵

International students enrolled in Queensland independent schools contributed around \$28.5m to the Queensland economy through expenditure on tuition and boarding fees in 2013-14, and it is estimated that a similar amount was expended on goods and other services in Queensland during this time.

ISQ has supported and contributed positively to international education in Queensland since 2003, and is the only non-government schools peak body in Australia that employs a full time staff member solely responsible for international education programs. ISQ works closely with the Independent Schools Council of Australia (ISCA) to represent the interests of non-government schools nationally in international education forums.

¹ Available at <http://cricos.education.gov.au/> (Accessed 23 August 2016)

² Overseas Students Ombudsman Quarterly Report 1 April – 30 June 2016, p.6. Available at http://www.ombudsman.gov.au/_data/assets/pdf_file/0009/40302/Overseas_Students_Ombudsman_Quarterly_Statistical_Report_April-to-June-2016TPS-confirmed.pdf (Accessed 19 August 2016)

³ Presentation to Queensland non-government schools by ESOS Systems and Compliance Unit in Brisbane, 22 April 2016.

⁴ ISQ Sector Statistics 2016 Non-State School (State) February Collection *Snapshot: Overseas Students*. Available at http://www.isq.qld.edu.au/files/file/About_Independent_Schools/Sector_Statistics/2016/SnapshotOverseas2016StateFeb_new.pdf. (Accessed 16 August 2016)

⁵ Australian Government PRISMS data. Available at <http://www.austrade.gov.au/Australian/Education/Education-Data/2016/Pivot-tables/pivot-tables> via MIP subscription.

2014 ISQ Submission

In April 2014, the ISQ submission *Revitalising the International Education and Training Sector in Queensland* noted:

It is the view of Independent Schools Queensland that growth in Queensland's international education sector can be achieved if there is a genuinely whole of government approach to engage with all stakeholders, public and private, in all regions and internationally, to improve educational outcomes for all students – international and Australian - choosing to be educated by Queensland institutions...

and observed:

1. *21st Century International Education is characterised by global engagement, and cannot be primarily focused on export. Genuine global engagement is achieved through a range of G2G, institutional, professional and personal strategic relationships for mutually beneficial educational and economic purposes.*
2. *High quality international education programs and projects are delivered by public and private providers across all sectors, and it is in Queensland's interests, in being globally connected, that public and private providers are equally valued and supported in development of strategic relationships and activities at home and abroad.*
3. *Growth and sustainability of international education programs in all sectors requires a whole of government approach.*

ISQ remains supportive of the broad principles and activities outlined in our 2014 submission, and is pleased to see these reflected to a large degree in the Queensland Government's 2016 *Draft Strategy*.⁶

2016 Trade and Investment Queensland (TIQ) Draft International Education and Training Strategy

ISQ commends the Government on its approach to developing a forward-looking Strategy that is based on research, underpinned by a diverse range of Queensland's strengths and backed by a financial commitment of \$25.3m over the next four years.

The next steps of "*developing and prioritising potential initiatives discussed in the Draft Strategy*"⁷ will, of course, be critical to success.

Given the nature of our sector, it will be important that there are sufficient opportunities for sectoral and individual school participation in events, campaigns and initiatives on an opt-in basis.

⁶ Draft International Education and Training Strategy to Advance Queensland 2016 – 2026. Trade and Investment Queensland (June, 2016). Available at http://www.tiq.qld.gov.au/wp-content/uploads/2016/06/TIQ-16-186_Draft-Strategy_13June_LR.pdf. (Accessed 16 August 2016)

⁷ Retrieved from <http://www.tiq.qld.gov.au/export/export-industries/education-and-training/international-education-and-training-in-queensland/> 16 August 2016.

Key Documents

1. The opportunity and imperative for Queensland's international and education training sector⁸

The Deloitte's Access Economics report for TIQ was commissioned as the basis for developing Queensland's Draft International Education and Training Strategy. It identifies Queensland's strengths and comparative advantages in international education and opportunities for Queensland providers within the contexts of global growth opportunities and the Australian Government's *National Strategy for International Education 2025*.⁹

The report analyses data relating to sectors and regions, and explains methodologies used for economic modelling to predict potential growth scenarios - with and without impacts of a targeted strategy factored in.

The *National Strategy*, under *Action 9.3 Identifying and responding to new opportunities*, claims: "Australia will... be agile and responsive to opportunities to increase the number of international students and international partnerships, capitalising on identified growth areas such as schools."¹⁰

The focus on schooling in the Deloitte June 2016 report is mainly limited to state schools. Unfortunately, when it comes to detail, there are inaccuracies and a limited understanding of non-government schools in particular. For example:

- In 2.1.4 *Providers of international education and training* (pp.10-11), the report claims "There are 280 schools registered with CRICOS", which is inaccurate, and that there is a larger proportion of students enrolled in "primary secondary schools" in non-government schools (than in government schools), which is nonsensical.
- The Queensland Department of Education and Training (DET) operates as a single CRICOS provider for all state schools enrolling students on student visas, and non-government schools generally hold CRICOS registration individually. According to the ESOS regulator for schools, there were 111 school providers registered on CRICOS in Queensland in April, 2016.¹¹ As noted above, 82 of these are Queensland independent schools.
- The report's analysis of the "offshore schools sub-sector" (pp.50-51) is somewhat superficial, neglecting to identify issues around accessibility to licensing of Queensland curriculum products outside DET International and of changes to Queensland senior assessment practices that will impact on the potential to deliver the QCE offshore.
- Information on the contribution of the school sector to Queensland's economy by inbound non-student visa groups appears to be limited to that provided by DET, and although the report identifies the important social, cultural and strategic contributions of the international education and training sector to Queensland, there is little recognition of the

⁸ The opportunity and imperative for Queensland's international education and training sector. Deloitte Access Economics report prepared for Trade and Investment Queensland (June, 2016). Available at <http://www.tiq.qld.gov.au/wp-content/uploads/2016/06/DAE-Queensland-international-education-analysis-Final-14June2016.pdf> (Accessed 16 August 2016)

⁹ *National Strategy for International Education 2025*. Australian Government (April, 2016). Available at https://nsie.education.gov.au/sites/nsie/files/docs/national_strategy_for_international_education_2025.pdf. (Accessed 16 August 2016)

¹⁰ Australian Government (April, 2016) p.31.

¹¹ Presentation to Queensland non-government schools by ESOS Systems and Compliance Unit in Brisbane, 22 April 2016.

extensive engagement of schools in broader internationalisation strategies such as sister school relationships and teacher and student exchanges.

- ISQ finds it interesting that, proportionally, the school sector has
 - a) a greater market share of enrolments nationally than other sectors (p.6) and
 - b) the value added contribution of the sector to the Queensland economy is second only to that of higher education. (See Table 3.4. p.30.)

With the key documents for national and state level international education strategies championing the growth of international student enrolments across all sectors, developing regional capacities, and increasing offshore delivery and study pathways, it is vital that the strengths and differences of the non-government schools sector are fully understood and appropriately represented within the Government's governance structure, as well as in policy development, planning and implementation of initiatives.

2. Draft International Education and Training Strategy to Advance Queensland 2016-2026¹²

i. Vision and Goal

In 2014 ISQ suggested that *"21st Century International Education is characterised by global engagement, and cannot be primarily focused on export..."*¹³

In 2016, ISQ continues to advocate for a shift in rhetoric about the goals and benefits of international education and engagement to reflect a 21st Century global mindset.

While it is important to quantify the economic benefits of international education to Queensland communities, it is equally important to explain the many other benefits of internationalisation (addressed to some extent on p.17, p.19 and pp.20-21) and to keep in mind that this document will have an international as well as a local audience.

With this in mind, we suggest that the word *"industry"* be either omitted or replaced by *"sector"* in the Strategy's *"Vision"*, and the *"Goal"* be re-cast to include social and cultural capital as well as economic value.

ii. Strategic Imperatives

ISQ supports the four *"Strategic Imperatives"* identified in the 2016 *Draft Strategy*:

- Promoting Queensland internationally
- Enhancing the student experience
- Strengthening our regions, and
- Connecting the international and training industry.

However, there are some elements missing if the Strategy is to achieve an increase in *"market share"* over the next ten years. It would be productive to include:

- Investment in building and increasing the capacity of individual providers, regional clusters and allied services and stakeholders. ISQ believes there is a need for

¹² Trade and Investment Queensland (June, 2016)

¹³ Independent Schools Queensland (April, 2014)

Government, through relevant research, governance structures and funding allocation, to proactively identify and support opportunities for professional development to support initiatives across all of the “*Strategic Imperatives*.”

- Provision for ongoing research. This is not addressed in the *Draft Strategy*, but is scoped in the Deloitte report¹⁴, and should provide the basis for an agile strategy, through providing intelligence, predicting trends, sharing good practice, targeting promotional activities and identifying opportunities and risks.
- The needs and aspirations of under 18s. For the school’s sector, it is important that under 18s and duty of care requirements are clearly understood and taken into account in the next stages of developing and implementing Strategy plans, projects and events.

Below are comments about specific “*Strategic Imperatives*” from the perspective of non-government schools. Further feedback will be possible when details about proposed initiatives and an implementation plan become available.

a) Promoting Queensland Internationally

- Promoting study pathways should be an integral part of marketing campaigns. Schools are the earliest entry point into study pathways.
- Government promotion of international education opportunities should be inclusive of all sectors whilst cognisant of sectoral differences. TIQ offshore offices with dedicated international education officers should regularly provide market intelligence and identify business opportunities across all sectors as part of the Strategy. All stakeholders could benefit from greater planning and co-ordination of activities, events and development of marketing materials based on timely intelligence to ensure there is a cohesive and collaborative approach to promoting destination and pathways opportunities across all regions and sectors. For example, sector working groups could:
 - ensure materials for agent training events, missions and other events are appropriately customised, focussed and up to date
 - communicate and consult with members on sector specific issues and initiatives
 - collaborate on cross-sector opportunities, issues and initiatives.
- It is important that consideration is given to students under 18 years of age in initiatives such as branding, marketing and alumni campaigns and promotion of scholarships. There have been a number of initiatives supported by Study Queensland where students under 18 years have not been able to participate.
- ISQ supports the initiative of “*Export Innovation Grants*” being available to assist school or regional groups with promotional activities.
- Small private providers such as non-government schools do not have the resources to join offshore events at short notice or fund full-time in-country representatives in key source countries, as is possible for large providers. Small providers must be able to opt-in to state-led campaigns, missions and events when it is possible for them to do so and when there is alignment with their

¹⁴ Deloitte (June 2016) p.84

individual strategic and marketing plans. This will include having notice of activities and events sufficiently in advance to allow allocation of budget, time and staff for participation.

- Missions with an international education focus provide greater benefits for schools than general trade missions. These do not need to be ministerial missions to be effective.
- There could be a more cohesive approach to whole of government messaging. Whilst Study Queensland has been actively seeking feedback from non-government schools on the Study Queensland website <http://www.qld.gov.au/education/international/>, the newly created Queensland Government website <http://www.qld.gov.au/education/international/> that provides advice on schooling opportunities for Queensland as well as international students requires considerable editing to achieve accuracy, impartiality, and balance in the information provided to students and parents looking for information for long and short term studies, study tours and exchange programs.
- Initiatives to promote Queensland education internationally should include building “*the international capacity of our education and training system*” by “*going beyond international student enrolments, encompassing student and teacher exchange, sister school relationships, internationalised curriculum and access to languages.*”¹⁵
 - The Study Queensland proposal to showcase school sector capabilities and achievements to international visitors at a major event such as the 2017 World Science Festival is an example of such an initiative. Organising and hosting events such as a cross-sector Global Citizenship and Employability Forum could also be possible.
 - Participation in study tours or exchanges whilst at high school has been identified in research as having a major impact on the personal attainments of young people¹⁶, can build support for international education at community level, and contribute to a cohesive society. The Queensland government could consider providing study abroad funding or scholarships to assist Queensland school students (from all school sectors) who do not have the financial means to have an international experience.
- Advocacy for direct flights to regional centres will be a boon to all providers outside Brisbane and Gold Coast. ISQ supports this initiative.

b) Enhancing the Student Experience

- Enhancing the student experience is a key element of the *National Strategy* as well as Queensland’s *Draft Strategy*. As noted above, it is important to ensure consideration is given to participation of students under 18 years of age in proposed initiatives such as pre-departure information sessions, welcome programs, student hubs and

¹⁵ Trade and Investment Queensland (2016) p.21

¹⁶ [Understanding Generation G and the Implications for Every Institution in Meeting Their Expectations](http://www.aiec.idp.com/aiec2013-past) Rob Lawrence (2013) p.11. Available at <http://www.aiec.idp.com/aiec2013-past>. Accessed 29 August 2016.

competitions. We want to encourage as many school age students as possible to continue their studies in Queensland.

- ISQ supports efforts to strengthen community connections with international students as a key priority, and to promote specific programs to attract family and friends to visit Queensland – particularly to regional destinations. The greater the sense of personal attachment a student has to his or her school and local community, the greater the return on word of mouth endorsement. Promoting tourism along with travel to attend graduation ceremonies, or developing community links for international students to volunteer, join sporting groups or mentoring programs to develop cultural understandings or employability skills are all ways to enhance community connectivity, and to raise community awareness of the value of international education at a local level. Combining multiple sources of funding to create events that connect international students with local communities might also be possible – for example, MAQ and regional council grants with other funding.
- Affordable, good quality accommodation – particularly homestay accommodation – is an essential element of an international student’s experience in Queensland, and also deserves to be a key priority in the overall strategy. However, introduction of “*Accommodation Quality*” benchmarked standards for homestay for self-accreditation in Queensland¹⁷ as a potential initiative or project would require research and cross-sectoral consultation to determine an approach that would be appropriate and sustainable for all sectors, age groups and locations. Many schools successfully manage their own homestay programs and ISQ will be mindful of any additional administrative burden or cost to member schools when supporting initiatives in this area.
- There has been considerable support in consultation forums for developing resources that provide pre-departure information to students coming to study in Queensland institutions. ISQ supports this as an initiative, providing the needs of students under 18 students are specifically addressed. Resources could include information about quality accommodation, including a guide to homestay for students and homestay carers as part of such an initiative. Information about pastoral care and support structures in the different sectors could also be included. It would be useful to have an online resource, covering general and sector specific topics, as well as destination advice, that can be regularly updated.

c) Strengthening our Regions

- Being a decentralised state, schools are our most widely dispersed education providers. There are CRICOS registered non-government schools in regional locations as diverse as Warwick, Toowoomba, Bundaberg, Rockhampton, Mackay, Charters Towers, Hervey Bay, Townsville and Cairns. This varies significantly from other states, where schools enrolling international students tend to cluster around metropolitan areas, and it presents both opportunities and challenges for Queensland schools. Along with schools in south east Queensland, schools in most regional locations suffered a significant downturn in overseas student enrolments in the period 2009-

¹⁷ Trade and Investment Queensland (2016) p.27

13.¹⁸ Increasing enrolments in regional schools will not only assist internationalisation of school communities but deliver economic, social and cultural benefits more widely.

- However, not all regional schools will have an opportunity to become a member of a regional study cluster group such as Study Cairns, Study Gold Coast or Study Townsville. It is important that there are opportunities for all schools, regardless of location, to participate in events, activities and initiatives, and to contribute to the growth of international education services in Queensland.
- It is obvious from both ISQ experience and the Strategy consultation forums that approaches to “*strengthening regions*” will require local input, ownership and customisation. For example, there will be a range of factors impacting on motivation, capacity, community support and availability of funding sources and infrastructure. In some cases, an integrated strategy to promote educational opportunities for domestic as well as international students may make sense if a region is seeking to attract business migrants as well as overseas students and visitors. Providers from non-metropolitan locations will need to have a voice by sector as well as by region in any proposed governance structures.

d) Connecting the International Education and Training Industry

- It will be important to ensure those undertaking the bigger picture strategic planning have sufficiently deep industry knowledge and experience to understand operational challenges within different sectors and locations. Consideration should therefore be given to creating a well networked group of international education champions to serve on advisory bodies, working groups and on an ad hoc basis when needed. While it is important for there to be a voice for each of the sectors in governance arrangements, engagement across sectors and with relevant agencies and organisations at state level and locally also needs to be facilitated.
- Recent key international education strategy documents at state and national levels all identify schooling and pathways as having the potential for growth, and for flow-on benefits for other sectors. For this to be facilitated, the Government’s industry advisory body will not be complete without an in depth understanding of the schools sector. This may mean increasing the knowledge base to ensure the differences between government and non-government schools – in terms of ethos, governance, location, student cohorts and enrolment patterns, source countries, program delivery and regulatory environment – are sufficiently understood to inform decisions and strategic planning for the more than 40% of private CRICOS registered providers in Queensland that are non-government schools. ISQ advocates that there be a voice for non-government schools on the Strategy’s advisory body, as government schools are already well represented in government departments within the proposed governance framework and in proposed initiatives.
- It cannot be assumed that broader opportunities that exist for government schools are also available to non-government schools. For example:

¹⁸ *Independent Schools Queensland Sector Statistics 2014* p.10. Available at http://www.isq.qld.edu.au/files/file/About_Independent_Schools/Sector_Statistics/SNAPSHOT-2014_forWeb.pdf. (Accessed 21 August 2016)

- It is DET’s intention to increase the number and variety of state schools accredited to enrol international students as part of the Strategy. While this is clearly within the government’s remit to develop international education programs in state schooling, there is no parallel proposal to support increased participation of non-government schools. For non-government schools, the regulatory burden and costs associated with becoming CRICOS registered and maintaining registration are considerable, and are borne individually by schools. Consequently, there is very little incentive for schools with small numbers of international students to remain CRICOS registered, or for schools to become CRICOS registered. It should be incumbent on government to advocate for an easing of regulatory burden and costs for non-government schools as part of the state’s Strategy.
- “...options to improve the affordability of state education for school aged dependants of international students in regions”¹⁹ is a proposed initiative. Dependants of most international students are not eligible for government funding in non-government schools, and ISQ would like to be assured that the actual cost of education for dependants of full fee paying international students in state schools in regional areas does not include a taxpayer subsidy, or alternatively, similar arrangements are made available for non-government schools.
- An “Offshore opportunities program” is given as an example as a “potential initiative”²⁰. The *Draft Strategy* also explores the “Offshore potential” of international education and training, citing the example of Hangzhou Dongfang High school, which delivers the QCE to Years 11 and 12 students in China: “At least 50 per cent of the QCE graduates who decided to come to Australia to study over the past two years have chosen universities in Queensland. This reinforces the value of offshore education as a pathway to onshore education in Queensland and the opportunities this can present for the Queensland industry.”²¹
Under current licensing arrangements with the Queensland Curriculum and Assessment Authority (QCAA), only EQI can deliver the QCE offshore. This situation would need to change for the full potential of Queensland schools to participate in offshore delivery of Queensland curriculum products and services to be realised.

iii. Underpinning Strengths

Diversity and quality should be at the core of Queensland’s strategy for promotion international education opportunities. Our decentralised state makes it relatively easy for us to promote diversity as one of our strengths. We offer more opportunities to engage with others from culturally and linguistically diverse backgrounds in more locations than in other states, but we need to ensure we maintain this advantage as one of our strengths.

As Queenslanders, we understand that our education system delivers quality learning outcomes for students, but this is a difficult attribute to market globally. However, with this Strategy, we have an opportunity to build perceptions of “quality” through positive student experiences. These are possible in any location, and in any institution, so is

¹⁹ Trade and Investment Queensland (2016) p.30

²⁰ Trade and Investment Queensland (2016) p. 23

²¹ Trade and Investment Queensland (2016) p.16

critical that we invest in enhancing student experiences – in fostering a culture of looking after students within our institutions and communities and ensuring they have the support to grow personally and to achieve their best academically. This is something schools do well, and is where our sector can make a very real contribution to the sustainability of international education in our state.

In summary

- ISQ commends the Government on a forward-looking and inclusive Strategy, and supports the four broad “*Strategic Imperatives*”. It will be important that there are sufficient opportunities for sectoral and individual school participation in events, campaigns and initiatives on an opt-in basis.
- There are some elements missing from the Strategy, including a commitment to capacity building and ongoing research.
- There are some priorities that cut across all “*Strategic Imperatives*”, such as supporting community connectivity, delivering affordable and quality accommodation for international students in all parts of the state, and including under 18s in Strategy initiatives, events and campaigns.
- Key national and state level international education research and strategy documents identify the schools sector as having the potential for growth, but the complexity of non-government schools in international education programs is not well understood outside our sub-sector. Non-government schools comprise 36% of CRICOS registered providers in Queensland, and 44% of Queensland’s private CRICOS registered providers. 82 of the 111 CRICOS registered school providers in Queensland are independent schools. Non-government schools do not have the same access to opportunities that are available to government schools. We advocate that non-government schools should be represented on any advisory group as well as in a school sector working group as part of the Strategy governance arrangements, and that ISQ has the experience and expertise to fulfil this role.
- While we support “*Strengthening our regions*” as a “*Strategic Imperative*”, regional schools located outside existing study clusters need to be appropriately supported in marketing and other Strategy initiatives, events, etc.
- The final version of the Strategy should use language that is appropriate for an international as well as a domestic audience. For example, it should avoid emphasising the economic benefits of international education over the many other benefits to communities. In current times, when the pressures of globalisation are contributing to a sense of alienation and disempowerment in all strata of society, internationalising education, communities, and regional economies and has never been more important.

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