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1.   ABOUT ISA

Independent Schools Australia (ISA) is the national peak body for Independent schooling in Australia. ISA represents the sector on national issues and engages with the Australian Government, national agencies, media, key stakeholders, and the wider Australian community.

Working with the eight state and territory Associations of Independent Schools (AISs), ISA represents 716,800 students, over 1,215 schools and a workforce of 122,000 people.

The Independent sector encompasses considerable diversity in size and location of schools, and the types of students enrolled. The latest available data shows that more than one in six Australian school students attends an Independent school. For secondary students, it is over one in five. Students at Independent schools reflect the full diversity of Australian society – including those who experience one or multiple forms of disadvantage.

Most families with children enrolled in non-government schools are middle-to-low-income earners, increasingly from culturally diverse backgrounds, and residing in outer-suburban and inner-suburban communities. Many of these families are currently facing economic stress and are making substantial sacrifices for their children's education.

Many Independent schools provide a religious or values-based education. Others promote a specific educational philosophy or interpretation of mainstream education. Some have been established by

7.2   Focus Questions Objecti...

1. Are there further reform... ...ould consider that will improve the quality an... integrity of the sector?

In addition to changes ...mented, the Government is proposing to introduce far-re... reforms for the Inter... ...tion and Skills sector in one tranche in the Education Servi... Overseas Students ... (Quality and Integrity) Bill 2024. ISA is concerned that the introduction of suc... ...ging reform agenda in such a short space time may have unfo... negative impacts ... ...ational Education and Skills sector.

ISA submits that ...ms in the Government's current agenda, including amendments ... ESOS Bill, be int... ...ages, with sufficient time for due consideration of implementatio... unintended cons... ...each step.

Currently, the Go... ...ends to have almost all provisions in the Bill come into effect as... possible after ena...

ISA requests consi... ...iven to staggering the introduction of integrity measures i... of the Bill (that alig... ...ve 1: *A Sector Built on Quality and Integrity* in the Fra... allow sufficient time ... ...anges to be in place and for providers to prepa...

Parts 7 and 8 of the Bill ... ...ptively lay the legislative groun... ...gov... to enact the goals of this ye... ...work. These ... ...e a great... more consultation across the i... ...ow feasibly th... might be implemented. The changes ... ...s should only be introd... after a period of comprehensive consultations with the International Education and Skills sector and not before January 2026 at the earliest.

2. What more can providers do to improve the integrity of the international education sector?

Independent and Catholic schools in receipt of government funding are already subject to high levels of regulation and accountability.[20]

Non-government schools currently enrol less than one per cent of overseas students studying in Australia and are generally considered to be low-risk providers. There is little overall benefit to the International Education and Skills sector to be gained by imposing the additional

enrolled with eight Government school providers and the remaining 30 percent are distributed across 324 CRICOS registered non-government schools Australia-wide.

Further, it will take some time to 'grow' enrolments in the non-government schools sector from current levels to pre-pandemic levels.

ISA is also concerned however that the broader implications and impacts of the introduction of enrolment limits at the provider level have not been addressed by Government. The ESOS Bill Explanatory Memorandum Impact Assessment does not address the impacts of enrolment caps.[21] It focuses only on other targeted legislative changes to the ESOS Act such as reporting on education a

7.3.7   (p 22) **7.3.7**

In the 2023-24 Student Visa Program year to 31 December 2023, 930 overseas students holding a school sector visa were granted a visa to study in the Higher Education sector and 252 overseas school students were granted a visa for the VET sector.[25]

ISA suggests the Government might consider providing funding assistance for university scholarships if wishing to attract top-performing overseas school graduates into preferred courses.

ISA supports changes to the Migration Points test that might benefit overseas school students who have completed Senior Secondary studies in Australia and continued studies at a tertiary u ol stude ges t

7.4   Focus Questions Objective 2

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enrolments across sectors, providers, and locations in Australia?

ISA advocates for the school sector to be exempt from provisions in Parts 7 and 8 of the Bill for limits to enrolments of overseas students.

A provider's level of risk and capacity to deliver high-quality educational and support services for students should always be a key factor in determining an optimal number of overseas student enrolments in any context or location.

CRICOS registration attributes of all school sector providers are closely monitored by DSAs, and the existing registration and review processes for the sector enable concerns about registered capacity to be addressed at the provider level.

2. What considerations for government should inform the overall level of international students in Australia?

ISA advocates the school sector should be exempt from provisions for the Government to limit enrolments in Parts 7 and 8 of the Bill and views this question of greater relevance and importance for the Higher Education and VET sectors.

Only two per cent of overseas students are enrolled in the school sector. Less than one per cent are enrolled in non-government schools. State and territory government departments of education manage overseas student recruitment, enrolment and placement in Government schools in registered campus locations. Non-government schools are generally responsible for managing their own International Education programs.

Enrolment caps should not apply in small sectors such as the Schools, ELICOS and Non-award sectors. It will be impractical for the Government to micro-manage enrolments at the provider level in these sectors as this will produce inequitable outcomes for providers.

If setting broad parameters for growth in the International Education and Skills sector overall, the Government should factor in the pathways opportunities that Transnational Education (TNE) and small sectors provide to overseas students for further studies onshore.

3. How will this approach to managing the system affect individual providers?

ISA advocates the school sector be exempted from provisions for the Government to limit enrolments in Parts 7 and 8 of the Bill.

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In representing over 20 per cent of the CRICOS registered providers in Australia that are non-government schools, ISA understands the importance and value of International Education to Australia and to the school sector.

ISA appreciates ongoing engagement with the Departments of Education and Home Affairs and other International Education peak bodies in key forums. These include the Education Visa Consultative Committee (EVCC) and the International Education Stakeholders Forum (IESF), which provide opportunities to consult on measures designed to safeguard the integrity and quality of this key services sector.

Most recently, engagement has focussed on informing

instance, and those that serve broader strategic purposes introduced only after a period of comprehensive consultations with the sectors to determine what is appropriate to be included in the ESOS Act, and to understand what impacts on providers and other stakeholders and implementation of desirable changes will look like.

It is not clear to ISA how the Government envisages the Council for International Education will become a 'key vehicle for sector stewardship.' From ISA's perspective, there is a 'communication gap' between the sector peak bodies and the Expert Members of the Council and currently, there is no formal structure to facilitate further engagement This situation requires review.

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