

Australian Catholic University (ACU)
Feedback to the Consultation on the *Draft*
National Strategy for International
Education

May 2015

**AUSTRALIAN CATHOLIC UNIVERSITY (ACU) FEEDBACK TO THE CONSULTATION ON
THE DRAFT NATIONAL STRATEGY FOR INTERNATIONAL EDUCATION**

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AUSTRALIAN CATHOLIC UNIVERSITY (ACU) FEEDBACK TO THE CONSULTATION ON THE DRAFT NATIONAL STRATEGY FOR INTERNATIONAL EDUCATION

Australian Catholic University (ACU) welcomes the opportunity to provide feedback on the Australian Government's *Draft National Strategy for International Education*.

ACU supports the development of this holistic strategy. Internationalisation is key to the future of Australia's education sector at all levels.

ACU has a strong integrated internationalisation strategy that aligns with and supports all of its key activities in teaching, research and community engagement. This strategy is also embedded in ACU's Strategic Plan.

ACU takes this opportunity to reflect on a number of elements of the *Draft National Strategy for International Education* (Draft Strategy) and Consultation booklet¹, and provides the following comments and feedback.

Pillar 1 – Getting the Fundamentals Right

ACU endorses the Government's view that a "strong, high quality education and research system is fundamental to maintaining Australia's international reputation" as a world leading provider of education services for international students.²

If Australia's universities are to be able to continue building an education system that provides high-quality teaching, learning and research outcomes, ACU believes that Government must ensure universities have the necessary flexibility and support to execute their educational objectives. To this end, ACU emphasises that the policy setting and provisions which Government should continue to promote are:

- The **maintenance of the demand driven funding system**, which has compelled universities to operate more efficiently and respond to workforce need. The demand driven funding system (DDS) was implemented to meet growing workforce demand for university graduates by funding universities on the basis of student demand for courses and industry need, rather than through central allocation of places by the Commonwealth Government. Relevantly, the Draft Strategy and Consultation booklet identifies that producing work-ready graduates "should be a key measure of the quality of Australian education" and an imperative to "meet the future workforce and research needs of our industries." There are strong economic reasons to maintain the DDS, which are serving to build high quality teaching, learning and research outcomes across the university sector and to lift the international competitiveness of Australia's higher education system. The DDS is: driving allocative efficiencies among universities; by creating a more competitive market, it drives universities to focus on students as customers; the DDS helps Australia meet its graduate shortage; and it does not adversely affect quality.³

Affirming the imperative to maintain support for the DDS, the 2014 *Review of the Demand Driven Funding System* endorsed the DDS.⁴ Amongst its key findings were the following, which demonstrate how the flexibility and support offered to universities under the DDS is serving to build high-quality teaching, learning and research outcomes in Australia:

- "The demand driven system has encouraged technology-based innovation in higher education"
- "The demand driven system has responded effectively to most recent skills shortages."

¹ Australian Government, *Draft National Strategy for International Education – For Consultation* (2015), at 22. Accessible via <https://internationaleducation.gov.au/International-network/Australia/InternationalStrategy/Documents/Draft%20National%20Strategy%20for%20International%20Education.pdf>

² Australian Government, *Draft National Strategy for International Education – For Consultation* (2015), at 10. Accessible via <https://internationaleducation.gov.au/International-network/Australia/InternationalStrategy/Documents/Draft%20National%20Strategy%20for%20International%20Education.pdf>

³ Please see Australian Catholic University's submission to the Review of the Demand Driven Funding System.

⁴ Kemp, D., and Norton, A., *Review of the Demand Driven Funding System – Report* (2014). Accessible via <https://education.gov.au/report-review-demand-driven-funding-system>

- A steady increase in student satisfaction with teaching has continued through the early stages of the demand driven system.⁵
- **Ensure sufficient funding and provide funding certainty for the university sector.** If Australia’s higher education system is to realise the objectives of the Draft Strategy – that is, to be globally competitive and stand out as the best in the world – universities must be provided with the financial security required to deliver quality higher education.

The reality is that there has been no funding security for universities, and both sides of politics have made cuts to universities over the years. This is a primary reason why ACU has supported the Government’s proposal to deregulate university fees. Fee deregulation would afford universities the financial security required to deliver the quality higher education courses needed to support Australia’s future workforce, which fuels economic development. It will allow universities to pursue a vital national research and knowledge agenda without which Australia will be increasingly vulnerable, technologically, economically and socially. Fee deregulation also has macroeconomic benefits. It will drive competition and provide universities with greater autonomy and incentive to compete on price, serving to lift overall diversity and quality across the sector as universities work to their strengths.

- **Uphold university autonomy and independence** as a fundamental public policy principle with respect to policy reforms impacting on universities. ACU believes that the best way to foster and encourage innovation, diversity and excellence in Australia’s higher education system is through upholding and facilitating university autonomy in policy reforms, which encompasses reducing unnecessary red tape. If universities are to achieve their educational objectives, they must be afforded the necessary latitude to be able to flexibly respond and compete in both a domestic and international setting; especially in today’s dynamic and highly competitive global education market.

ACU strongly endorses Strategic Action 1.4 in the Draft Strategy which recognises this important underpinning principle by committing that the Australian Government will “reduce the reporting and compliance burden on international education institutions and achieve better alignment with legislation that supports Australia’s quality assurance framework for education.”

ACU supports the Government’s broad higher education reform agenda, key aspects of which are outlined above including the maintenance of the DDS, deregulation of university fees, and a reduction in red tape. They allow universities to plan and have a degree of fiscal independence and autonomy with reductions in reporting requirements. Greater financial autonomy will allow institutions to invest in research and ensure that the Australian higher education system is not left behind due to inadequate investment.

Goal 1: Creating a World-Class Education System

ACU notes that the wording in Goal 1 of the Draft Strategy outlines an objective for Australia to create an education system that will stand out as one of the best in the world with “some of our institutions ranked among the very best.”

ACU recommends that the words “some of our institutions” should be omitted from Goal 1 as it runs counter to the objectives of building a world class education system which necessarily encompasses all institutions; and could lend towards the creation of bad public policy. Public policy that concentrates investment in a segment of the university sector at the expense of the rest of the university sector will be counter to realising the Government’s objectives. Goal 1 should instead read:

“To be globally competitive, Australia will continue to work to create an education system that stands out as the best in the world, with our institutions ranked among the very best.”

It is important here to highlight that diversity is a major strength of Australia’s higher education system. ACU recognises that all universities should not try to do all things, however each institution should be supported to develop their individual strengths.

⁵ Kemp, D., and Norton, A., *Review of the Demand Driven Funding System – Report* (2014). Accessible via <https://education.gov.au/report-review-demand-driven-funding-system>

ACU commends the Government's commitment, as articulated in the Draft Strategy, to "introduce reforms across Australia's higher education system that will...increase diversity, encourage competition and provide choice for students" in order to "support greater freedom to achieve excellence." Diversity has been advanced under the demand driven system which has propelled universities to focus on their unique strengths in order to differentiate themselves in the higher education market. Universities must demonstrate to prospective students that they can 'value-add' to their learning experiences, and portray how their courses can more readily equip the student with the knowledge and skills being sought.

ACU believes that if Australia's education system is to successfully face the challenges of increasing global competition, Government must:

- Support a diversified research landscape where all universities are funded to undertake quality research and play to their particular demonstrated research strengths.
- Encourage universities to align teaching with their particular research strengths.
- Secure a policy environment which recognises that universities that are growing research capacity need to be supported and allowed sufficient time to develop their research strengths.
- Endorse strategies that support research intensification across all universities, promoting:
 - Greater concentrations of research excellence.
 - Competitive and strategic allocation of resources based on 1) well-articulated research plans and 2) rigorous assessment of performance.
- Recognise the vital connection between university research and teaching, which underpin scholarship and innovation and will lift the quality and international competitiveness of Australia's education system.
- Facilitate active engagement in strategies to build international research engagement and collaborations. As the Draft Strategy recognises, there is significant advantage to be gained from tapping into research talent and advances overseas by collaborating with the world's leading researchers and research institutes.

Non-University Higher Education Providers (NUHEPs)

Goal 1 of the Draft Strategy makes reference to the Government's policy proposal to extend tuition subsidies to non-university higher education providers (NUHEPs) registered with the Tertiary Education Quality and Standards Agency (TEQSA). ACU has previously put on record its opposition to this proposal and continues to maintain this firm view.⁶ ACU opposes extending public funding to NUHEPs for the following reasons:

- In a strained fiscal environment the government should not be making already successful profit making ventures dependent on government funding.
- There is potential adverse impact on the quality and international reputation of Australia's higher education system. TEQSA, the sector's quality and standards regulator, has already had resources reduced and will be overburdened (if not so already) in assuring the sustained quality and timely regulation of an expanding list of providers.
- It will have an adverse impact on regional universities and flow-on effects on workforce capacity in critical areas of need across the nation.
- NUHEPs have distinctly different objectives: they operate primarily to make profit. Public universities are fundamentally concerned with teaching and learning, quality education, and scholarship.
- The substantial costs and important obligations that universities must meet as public institutions require that universities receive a larger share of funding.

In the event that Commonwealth funding is extended to NUHEPs, ACU considers that this funding should be 60 per cent lower than the funding provided to universities, to account for the different nature of the work universities do and the additional responsibilities incurred by universities in their ordinary operations.

⁶ See Australian Catholic University submissions to the: Senate Inquiry into the *Higher Education and Research Reform Amendment Bill 2014*; Senate Inquiry into the *Higher Education and Research Reform Bill 2014*; and the Senate Inquiry into the Principles of the *Higher Education and Research Reform Bill 2014* and related matters.

Strategic Action 2.1 Strengthening and diversifying institutional partnerships

The commentary in Strategic Action 2.1 in the Consultation booklet states that “Institutions in northern Australia are well placed to form new partnerships in Asia.”⁷ This seems a somewhat limiting statement as the reality is that Australia as a country is proximate to Asia and a vast majority of educational institutions are located south of the Tropics. ACU recommends a revision of this wording and would suggest that reference to northern Australia should simply read “Australia”.

ACU reiterates its view that diversity is a major strength of Australia’s higher education system, and that each Australian university has different things to offer the wide range of international students who consider and are attracted to study in Australia. It is important that this is clearly recognised in the Draft Strategy and in Australia’s international education outreach.

Strategic Action 2.4 Broadening engagement to create new opportunities and Section 4.2 Marketing Australia

Section 4.2 states that “The Australian Government welcomes state and territory governments continuing to:

- Take part in trade missions....
- Establish a presence...
- Strengthen regional branding initiatives
- Consider how...”⁸

Whilst there may be a role for state and territory governments in promoting and supporting internationalisation of education, there is a very real danger of Australia’s international education ‘brand’ being fragmented and lacking in clarity. ACU believes that there needs to be a much stronger and clearer concept of what Australian education means than is currently the case, how it is portrayed and branded internationally. The states and territories can then align their positioning with the national approach.

Strategic Action 3.2 Rejuvenating language study

ACU applauds the Government’s focus on language studies. Rejuvenation of language programs is critical to internationalisation of education but we believe more needs to be done to support the offering of languages at University and the enrolment of students in language programs.

Without strong language programs at University taught by suitably qualified staff, it will not be possible to grow language programs in schools. ACU believes that this would entail a suite of initiatives that may include financial inducements for students, seed funding for the development of language programs in universities, and linking migration and language teaching policies.

Strategic Action 4.1

ACU strongly supports the Draft Strategy’s focus on attracting talented international research students. The current range of scholarship programs that support international higher degree by research students need to be reviewed and broadened in order to ensure that Australia is internationally competitive in recruiting the best higher degree by research (HDR) students.

⁷ Australian Government, *Draft National Strategy for International Education – For Consultation* (2015), at 22. Accessible via <https://internationaleducation.gov.au/International-network/Australia/InternationalStrategy/Documents/Draft%20National%20Strategy%20for%20International%20Education.pdf>

⁸ Australian Government, *Draft National Strategy for International Education – For Consultation* (2015), at 27. Accessible via <https://internationaleducation.gov.au/International-network/Australia/InternationalStrategy/Documents/Draft%20National%20Strategy%20for%20International%20Education.pdf>

Attachment A - Australian Catholic University (ACU) Profile

Australian Catholic University (ACU) is a publicly funded Catholic university, open to people of all faiths and of none. ACU operates as a multi-jurisdictional university with seven campuses across four states and one territory. ACU campuses are located in North Sydney (NSW), Strathfield (NSW), Canberra (ACT), Melbourne (Victoria), Ballarat (Victoria), Brisbane (QLD) and Adelaide (SA).

ACU is the largest Catholic university in the English speaking world.

Today, ACU has more than 30,000 students and over 1,800 staff. ACU has a diverse international student population of over 3,000 students from 98 different countries.

ACU is globally connected and has relationships with more than 130 universities and educational institutions in over 30 countries in the Americas, Europe, Africa and Asia. These partnerships support a broad range of shared initiatives including student exchange and study abroad programs, staff mobility and collaborative research, mutual recognition of curriculum, transnational education, capacity building and shared community engagement programs.

While teaching, learning, and research at ACU is inspired by 2000 years of Catholic intellectual tradition, ACU is a diverse institution, attracting students and staff from a diverse range of faiths and backgrounds.

ACU graduates demonstrate high standards of professional excellence and are also socially responsible, highly employable and committed to active and responsive learning. ACU graduates are highly sought after by employers, with ACU graduates securing a 93 per cent employment rate.⁹

ACU has built its reputation in the areas of Health and Education and is a major producer of nursing and teaching graduates in Australia.

ACU educates the largest number of undergraduate nursing and teaching students in Australia,¹⁰ serving to meet significant workforce needs in these areas. Under the demand driven system, ACU has sought to focus and build on these strengths.

On 1 January 2014, ACU consolidated its previous six faculties into four:

- Faculty of Health Sciences;
- Faculty of Education and Arts;
- Faculty of Law and Business; and
- Faculty of Theology and Philosophy.

These new arrangements create a more efficient and competitive structure focused on the needs of industry and employment partners. ACU is also moving towards the adoption of a shared services model where suitable, to improve efficiencies, internal processes and better allocate resources.

ACU is committed to targeted and quality research. ACU's strategic plan focuses on areas that align with ACU's mission and reflect most of its learning and teaching: Education; Health and Wellbeing; Theology and Philosophy; and Social Justice and the Common Good.

To underpin its plan for research intensification, in 2013 ACU abolished its existing research centres and groups and set about establishing new research institutes, to align with the mission of the university. The strategy has involved the appointment of high profile leaders to assume the directorships of these institutes, and to work with high calibre Institute members and Centre/Program leaders.¹¹

- The Mary MacKillop Institute for Health Research (Faculty of Health Sciences)
- Institute for Positive Psychology and Education (IPPE) (Faculty of Health Sciences)
- The Institute for Health and Ageing (Faculty of Health Sciences)

⁹ *Graduate Destination Survey (GDS) 2014.*

¹⁰ Hobsons, *The Good Universities Guide 2015 to Universities, TAFEs and Higher Education Providers* (2014).

¹¹ See Australian Catholic University, 'ACU Research Institutes', at <http://research.acu.edu.au/institutes/>

- Learning Sciences Institute of Australia (LSIA) (Faculty of Education and Arts)
- Institute for Social Justice (Faculty of Education and Arts)
- Institute for Religion and Critical Inquiry (Faculty of Theology and Philosophy)
- Institute for Religion, Politics and Society (IRPS) (Faculty of Theology and Philosophy)