English Australia Submission

International Education Advisory Council

Development of an International Education Strategy for Australia

June 2012

ENGLISH AUSTRALIA

QUALITY | SUPPORT | ASSURANCE

Development of an International Education Strategy for Australia

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Executive Summary & Key Recommendations

English Australia believes that Australia is currently wasting many of the opportunities presented by international education, with a focus by government departments on controlling, restricting and curtailing the industry's activities, rather than focusing, supporting and nurturing an innovative and entrepreneurial approach to engaging with the world through education. Provider resources have for too long been focused on compliance, administration and red tape rather than on excellence and their core business of delivering a quality education experience.

This submission reflects the current environment for international education, addressing a number of the issues that are confronting the industry at the moment. The submission also, however, seeks to take a perspective on developing a strategy that will position the industry for a long-term sustainable future.

English Australia believes that a successful, robust and sustainable international education industry would have the following characteristics:

- acknowledgement at the highest level of government of the importance of the international education industry to Australia's current and future prosperity and a policy platform that sends clear messages about this importance;
- focus on communicating a positive, coherent narrative within the federal government, within state and territory governments, within the industry itself and to the Australian people about the value of international education to the nation;
- appropriate structural mechanisms in place to ensure a strategic, whole-of-government and cross-sectoral approach to delivering on a national strategy;
- a regulatory framework that ensures minimum quality assurance standards, but also supports excellence and allows for innovation and entrepreneurialism;
- a transparent, supportive and encouraging visa program applied globally with a maximum level of consistency;
- an appropriate level of funding/investment to allow for and enable a competitive industry.

Key Recommendations

Recommendation 1. Create a dedicated ministerial or parliamentary secretary position for International Education, reporting directly to the Prime Minister.

Recommendation 2. Establish a body with responsibility for driving the international education strategy with an appropriate governance structure and joint government/industry 'ownership'.

Recommendation 3. Create and communicate a positive, coherent narrative about the value of international education to the nation.

Recommendation 4. Ensure the international education strategy for Australia includes key elements for sustainability.

Recommendation 5. Ensure a focus on 'excellence' – beyond minimum standards and compliance.

Recommendation 6. Ensure the elements of risk assessment and management recommended by the Baird and Knight reviews are effectively implemented - not lost or damaged in translation into government regulation as is currently taking place undermining important and innovative reforms which promote excellence by rewarding responsible providers.

Recommendation 7. Ensure an appropriate framework for driving excellence through quality assurance that is specific to each sector, including the ELICOS sector.

Recommendation 8. Ensure an appropriate level of funding/investment from government commensurate with the importance of the industry and ensuring that the industry is internationally competitive.

Background

In October 2011 the Minister for Tertiary Education, Senator the Hon Chris Evans, announced the formation of the International Education Advisory Council to inform the Government's development of a national, long-term strategy for the international education sector.

On 24 April 2012, the Council released a discussion paper which raises a number of themes and questions that will help to inform the development of a five-year national strategy to support the sustainability and quality of the international education sector.

The consultation process is taking place in parallel with a number of recent government and other initiatives including:

- *Stronger, simpler, smarter ESOS: Supporting international students*, the report of the review by the Hon Bruce Baird AM, released in March 2010;
- The COAG *International Students Strategy for Australia (ISSA) 2010–14*;
- The *Review of the Student Visa Program*, conducted by the Hon Michael Knight AO.
- The establishment of the *Australia Awards Board* in May 2011;
- *A Strategic Vision for International Education in Australia*, released by the International Education Association of Australia in October 2011; and
- *Australia in the Asian Century Discussion Paper*, released in December 2011.

The Council will consider the lessons learnt from recent events, the new directions indicated by the Baird and Knight reforms, and what else needs to be done by governments and education providers to achieve a sustainable growth path for the future.

English Australia Response to the Discussion Paper

English Australia welcomes the opportunity to provide input to the development of a national, long-term strategy for the international education industry.

The international education industry is complex, encompassing a diverse range of sectors, provider types, program types and students with varying motivations for choosing to study overseas. English Australia will focus this submission on the **ELICOS sector perspective** as other submissions will no doubt offer a range of other perspectives.

International education in Australia has a remarkable history, recently captured in the publication "Making a Difference"[1], launched in November 2011 to celebrate the industry's achievements over 25 years. Over this period the industry has grown from virtually nothing to Australia's third largest export industry after iron ore and coal.

The ELICOS sector itself has an impressive history, with Australia the first country to establish a national English language sector specific accreditation body[2] in 1990, and with this quality agenda driven by collaboration across both public and private providers, successfully taking significant market share from the leading competitor countries of the UK and the USA.

Profile of the ELICOS Sector

Over 1,423,000 people travelled to an English speaking country to learn English in 2010 – globally the industry is worth over US$10.5 billion.

The top two destinations for international students wishing to learn English are the UK and the USA, followed by Canada. In just over 20 years Australia has taken considerable market share as a destination for international students wanting to improve their English language skills to consolidate its position as the fourth most popular destination. Australia's global market share in 2010 was estimated at 10% of English language students and 14% of the number of weeks spent studying English.[3]

In 2011, 134,440 international students undertook English language courses in Australia. 54% of these held student visas, 24% visitor visas and 22% working holiday and other visas[4].

The ELICOS sector plays an important role in a number of areas related to international education and other service export areas. International students cannot undertake studies within other education sectors without the necessary English language skills. **The ELICOS sector provides an essential "pathway" role in assisting many international students to develop the English language skills they require to be successful in further studies.** This is a fundamental component of the typical international student course plan, not only developing their English language skills, but also providing them with the study skills they need to be successful in the Australian environment.

Recent AEI data[5] shows that approximately 66% of student visa holders completing English language courses in 2010 continued through to further study in other sectors. Another way of looking at the data is that 30% of higher education students and 39% of VET students studied English language courses immediately prior to commencing further study.

[1] "Making a Difference: Australian International Education" edited by Dorothy Davis and Bruce Mackintosh, November 2011
[2] National ELT Accreditation Scheme (NEAS)
[3] Ref: Appendix A – English Australia Fact Sheet – Global Language Travel
[4] English Australia Survey of Major ELICOS Regional Markets in 2011
[5] AEI Research Paper "Study pathways of international students in Australia" May 2012

The ELICOS sector also plays a key role in delivering English language courses to students without further study goals, but who see improved English language skills as a key contributor to their future success in a world where English language skills and an overseas cross-cultural learning experience are seen to give competitive advantage in an increasingly globally connected world. Applying the AEI data for pathways shows that if all visa holders are included, **the majority (64%) of ELICOS students are in Australia with English language study as the primary goal**.

The ELICOS sector plays a vital role in opening up new markets for international education. An important element of Australia's current international education strategy is that of diversification and there are a number of emerging markets which the industry is currently developing in order to further this strategy. In these countries the profile of Australia's education services is relatively low and there is an identified trend that international students from emerging markets tend to undertake short preliminary ELICOS courses in order to increase their knowledge of Australian further study institutions and confirm their plans for further study. The ELICOS sector has always been entrepreneurial in moving into new markets, with the initial starting point being short English language courses which require low financial investment and low risk on the part of students. These short courses have traditionally provided a platform for raising the profile of Australia as a destination for international students from new source countries.

In 2011 46% of ELICOS students undertook English language courses whilst visiting Australia on working holiday or visitor visas. Australia's ability to provide English language training within an English speaking environment adds a further dimension to its appeal as a tourism destination. In addition to independent students, ELICOS colleges provide a large number of study-tour programs for groups of young people in their school/university holidays. These study-tour programs provide potential long-term students with the opportunity to experience the quality of education that Australia has to offer.

The ELICOS sector has many features which make it different to other education sectors and extremely vulnerable to changes in the external environment. This vulnerability is clearly demonstrated by the extreme fluctuations in the pattern of enrolments as seen over the last 13 years, ranging from a -29% decline experienced in 1998 as a result of the Asian economic crises to +27% in 1999 as the market recovered. The five years from 2004 to 2008, however, broke this pattern with an unprecedented level of consistent, strong growth year on year. In 2009 this growth pattern finally came to a halt with student numbers in decline ever since (ref. Appendix B).

The ELICOS sector is highly vulnerable to changes in the external environment. Whilst other sectors provide education and training to both domestic and international students, the student body of ELICOS providers is 100% international students. The sector therefore does not have an economic "buffer" to any downturns in international student numbers. Even short-term downturns have the potential to impact severely on institutions' cashflow and operational viability. ELICOS providers attached to universities and other publicly funded institutions are no exception to this exposure.

Revenue for ELICOS providers is based on length of course rather than numbers of students. Whilst other education sectors tend to recruit students for semester or longer programs of study, ELICOS providers offer programs based on a unit of one week, with fees per week. The number of weeks studied is therefore the most important indicator of growth/decline for the sector, rather than the number of visas issued or the number of students. Any change in the external environment which may affect the length of courses undertaken by students has the potential to impact severely on providers' economic viability. Providers need to recruit more students to make up for the loss in student weeks.

The ELICOS sector offers short courses with a resulting high turnover in student numbers. The English Australia ELICOS Industry Report for 2011 indicated that the average length of course for students in the ELICOS sector was 11.2 weeks (15.3 weeks for student visa holders). The resulting high turnover of students and low revenue per student ratio means that ELICOS providers do not get the same return on their marketing/administrative dollar as that of providers offering longer courses. Intakes of new students tend to be weekly rather than twice a year as is the norm for the university sector. Intakes of new students are therefore immediately affected by any change in the external environment.

The Australian ELICOS industry has been respected globally as a world leader due to the cohesiveness and professionalism of the sector. Public and private sector institutions work together closely within the national association and until recent government initiated reforms to the regulatory environment, Australia's National ELT Accreditation Scheme (NEAS) has been the envy of the world, providing consistent standards and rigorous auditing for all providers.

The Discussion Paper

The discussion paper notes that:

> *"An international education vision and strategy must respond to a world vastly different from the time of the Colombo Plan, one which faces significant challenges as outlined earlier in this paper. While a number of these challenges remain, there are further issues emerging such as the economic and social transformation of the Asian region, including the rise of two powerhouse economies, China and India, ongoing world economic uncertainty and the development of a number of regional education hubs such as Singapore and Malaysia, reflecting increased competition to attract the world's best and brightest. An international education vision and strategy will need to build on recent successes and positive developments that secure Australia's future in international education, as well as addressing areas where new approaches are required."*[6]

1. How can we draw from past experience in preparing an international education vision and strategy that takes Australia forward in a rapidly changing global environment?

The sector has been successful to date because of the **initiative and entrepreneurialism** of individual education providers as well as **sector-wide leadership and a focus on quality**. The sector has been agile and responsive to opportunities, opening up new markets, creating new products and services. Australia was a latecomer to international education, but we moved quickly and took considerable market share from established players like the UK and the USA. Like any industry there have been identifiable 'pioneers' who led the way in breaking new ground, to the extent that other countries looked on with envy and are now trying to replicate many of the features that brought about Australia's success.

The sector has also been successful because of our **focus on professionalism**. Examples of this can be seen across a range of areas, including:

- world-leading legislation in the Education Services for Overseas Students (ESOS) Act;
- the work of sector peak bodies such as English Australia in providing leadership, coordination and a focus on quality;
- for the ELICOS sector, the establishment of a national accreditation body, the NEAS, in 1990 with national standards to ensure a consistent approach to quality across both public and private providers in what is a purely internationally focused sector – the first country worldwide to do this;
- industry led professional development and leadership through key conferences such as the English Australia Conference, now in its 25th year, and the Australian International Education Conference (AIEC).

[6] Discussion Paper – page 6

To some degree it might be said that the sector became somewhat complacent in its success, forgetful of the fact that leaders do not stay leaders for long unless they continue to innovate.

English Australia is concerned that many of the qualities that underpinned the sector's success have now been lost as government departments become increasingly risk averse and apply an increasing level of regulation that is stifling the industry. Without risk there are no rewards. **A focus on compliance and minimum standards leads to mediocrity and standardisation, whereas English Australia believes we should be aiming for excellence and opportunities to differentiate ourselves from the rest of the world.**

The recent Baird and Knight review driven reforms have resulted in both government and industry focusing inward on our own problems rather than being focused outward on our students, our markets and our competitors. The compliance burden has been shifted from government to the education providers themselves. The cost of regulation is being carried by providers, with the private sector in particular allocated the financial responsibility for addressing the failures of the government regulators when colleges close that should never have been given the licence to operate or that should have been more closely monitored. In no other industry are compliant providers forced to pay for the 'sins' of the non-compliant providers. In no other industry would providers be levied higher amounts as a direct result of business levels being low and revenue reduced (as was the case this year with contributions to the Assurance Fund).

We need to restore the balance. Policy is being crafted in Canberra at a far remove from the reality of the education providers and the market itself. **We must find a better approach that acknowledges risk but provides greater flexibility to support innovation, an approach that sees government and industry engaged as partners with the same overarching goals**.

The international education industry has also to a great degree over recent years been focused on demand rather than supply. We are a diverse and 'splintered' sector with a lack of coordinated focus both between government and industry and across all the sectors of the industry. The tourism industry was similarly focused and similarly challenged and finally realised that a more comprehensive approach was needed, resulting in the development of a *National Long-term Tourism Strategy* in 2009. The introduction to their 2011 progress report reflects similar issues to those confronting the international education industry:

> *"The Australian tourism industry is undergoing structural adjustment. It is a labour intensive industry with a relatively high cost base, facing increasing levels of global competition. The higher Australian dollar, increasing demand for labour from the mining sector and more intense competition from lower cost destinations represent significant challenges facing the industry. At the same time the emergence of Asia as an economic powerhouse offers great opportunities for Australian inbound tourism.*
>
> *In this environment of great challenges and opportunities a business as usual approach no longer works. The tourism industry needs greater investment, better quality product, less red tape, more productive firms and a larger, better skilled labour force. Since 2009, the National Long-Term Tourism Strategy — Tourism 2020 (the Strategy) has provided a framework for industry and government to work together to address supply side and structural issues that will help the industry meet the challenges and realise its full potential."*[7]

[7] National Long-Term Tourism Strategy – Tourism 2020: Progress Summary 2009–2011 (May 2012)

The International education industry could benefit from emulating the approach taken by the tourism long term strategy – and replicating the key elements reflected as follows:

1. *Positioning for long-term growth*
   Stimulating consumer demand and securing jobs
2. *Leadership*
   Strategic and coordinated leadership that will drive the national tourism agenda
3. *Informing industry and government*
   A research and development agenda that will inform industry and government
4. *Facilitating investment and regulatory reform*
   Investment that will ensure Australian tourism product remains competitive in a global marketplace
5. *Labour and skills*
   Labour and skills development that will support tourism industry needs
6. *Responding to challenges*
   Tourism businesses that will adapt to the impact of change, climate change and other external shocks
7. *Excellence in product and service delivery*
   Product quality and service delivery that will ensure Australia is a high-value destination
8. *Strengthening our competitiveness with industry and product development*
   Destinations and tourism product that will make the most of our unique attributes
9. *Measuring our performance*
   Performance indicators that will track progress and support strategic priorities[8]

2. Which emerging issues do you believe will impact on international education in Australia?

The discussion paper provides a description of the ELICOS sector as follows:

> *"English Language Intensive Courses for Overseas Students (ELICOS), with its own rich history and role in teaching English and preparing overseas students for progressing to further study within Australia. The initial English language or bridging course segment plays a critical role, as it is often the first point of contact for international students and acts as a pathway to other providers;"*[9]

The discussion paper also notes that:

> *"In 2010, 30 per cent of commencing higher education students had previously studied ELICOS, indicating the importance of ELICOS as the first step in a study pathway for many international students. Hence, the sustainability of the ELICOS sector is an important factor in the success of Australia's international education sector as a whole. It should also be noted that around 40 per cent of ELICOS students enter Australia on a tourist or working holiday maker visa and are not included in the international student statistics used throughout this document."*[10]

The ELICOS sector does indeed play a critical role, however not just as a pathway to further study. The discussion paper touches on the different segments within the ELICOS sector but lacks detail. This is provided in the *Profile of the ELICOS Sector* section of this submission (page 6 above) as well as in the Appendices to this submission.

[8] National Long-Term Tourism Strategy – Department of Resources, Energy & Tourism – page 1
[9] Discussion Paper – page 7
[10] Discussion Paper – page 11

The ELICOS sector is currently influenced by two key global trends:

- **as recognised by the United Nations World Tourism Council, growing wealth in former developing countries is leading more young people to enjoy the cultural experiences of travel; and**
- **the desire to become proficient in English for education, business, cultural and leisure purposes will continue well beyond the five year scope of this review.**

Current buzzwords are 'global citizens', 'borderless education', 'global human capital'. What are we doing as an industry to understand and respond to global developments and changing global demand for education? It is important to understanding the ELICOS sector and its key role in contributing to the development of 'global human capital' that the following features of the sector are highlighted:

- young people are increasingly mobile;
- study, travel and work options are becoming increasingly intertwined as young people are looking to explore different opportunities;
- working holiday visa programs around the world are facilitating valuable opportunities for travel and cultural exchange;
- whilst the youth market makes up a substantial proportion of the ELICOS student cohort, there is a trend to increasing levels of study travel in other stages of life – whilst the 'gap year' is used by young people to gain greater experience and maturity between school and university or between university and employment, increasing numbers of people are taking 'career breaks' between jobs and using this opportunity to develop new skills (including English language skills) that will help them transition to new careers;
- English language skills are increasingly important to enhance career and employability options;
- English language skills are no longer viewed in isolation from other skills – employers are looking for cross-cultural experience, communication skills, confidence and autonomy – all skills that can be gained from overseas travel;
- it is increasingly hard to profile 'genuine international students' (as DIAC tries to do) as motivations are changing constantly.

It is also important to understand that because of the nature of the ELICOS sector and language learning, the words 'quality' and 'sustainability' have different definitions to those they might have when used in reference to other education sectors and formal education pathways that result in Australian qualifications.

English language students are looking for a range of characteristics when they are considering the quality of their language learning experience, as demonstrated in the ELT Barometer research conducted by English Australia with AEI funding (see Appendix D).

When it comes to questions of sustainability, it is important to note that the sector is 100% international. With international students as their core business, providers are extremely vulnerable to factors that impact on student flow. Declining numbers have immediate impact on business viability and cashflow. If we look at the recent Knight reforms, whilst streamlined visa processing and post study work rights may eventually increase interest in Australia and have some washback effect for some ELICOS providers, **we need to look at broader strategies that will support the diverse range of providers that operate across the ELICOS sector, including those that do not deliver pathway programs**.

The sector will continue to be challenged if DIAC continue their failure to acknowledge stand-alone English language training as a valid course of study reflecting the student profile as described above.

We will lose our entrepreneurs and our boutique operators as well as those global chains that are finding it too hard to operate in Australia compared to other countries and are moving out.

It is also important to acknowledge that **the world is competing for skilled migrants**. In its move to de-couple education from migration, Australia has lost a significant opportunity to attract the brightest and the best, not just as students but as potential future citizens

The Council proposes the following as a vision for Australia's international education strategy:

> *"Australia is recognised, both regionally and around the globe, as a world class provider of education and training, a partner of choice for educational collaboration, and a country that openly welcomes international students and helps them achieve their goals."*[11]

3. Does the vision reflect Australia's aspirations for international education? If not, how can it be strengthened?

The Council's proposed vision reflects to a great degree the current reality and is not truly aspirational as a vision should be.

Australia's international education vision should not just be focused on what we can do for international students, but should reflect how we prepare and empower all our students, including Australian students, to be global citizens.

It would also be important to have a values statement underpinning the vision, including the importance of youth mobility and cross-cultural exchange to Australia as a nation.

A. Australian education institutions deliver opportunities and outcomes of the highest quality to Australian and international students

4. How can the quality of education provided by Australian institutions to international students be effectively monitored?

For other education sectors, ESOS sits as an additional quality assurance layer specific to international students on top of an existing quality assurance framework established for domestic students. ESOS aims to address the specific needs of international students and assumes that the quality of educational outcomes is addressed by the primary quality assurance framework.

The ELICOS sector is different. Firstly it does not deliver programs to domestic students, so has not had a government established primary quality assurance framework. Secondly **its existing, industry established, primary quality assurance framework has been weakened by the establishment of government standards for ELICOS that have been absorbed into the ESOS Act and are not being effectively monitored**.

English Australia endorses the new national approach to regulation taken by recent government initiatives but is concerned that the long-standing national approach for the ELICOS sector, embodied in the NEAS[12] model, is being dismantled as the new National ELICOS Standards are handed to the Australian Skills Quality Authority (ASQA) and the Tertiary Education Quality and Standards Agency

[11] Discussion Paper – page 12
[12] National ELT Accreditation Scheme

(TEQSA) to implement. This handover process has brought with it a strong risk that the ELICOS expertise that has been developed over 20 years within the NEAS is in danger of being dismantled and lost and that the current national approach is being compromised. English Australia believes that any provider that delivers English language programs should be audited against the National ELICOS Standards and that greater national consistency would be obtained if this was done by a single body with the appropriate level of expertise, the NEAS, regardless of whether they are stand-alone ELICOS providers or whether they also operate within other sectors to deliver programs to overseas students.

The Australian model of quality assurance for the ELICOS sector was highly admired, commended and emulated internationally, primarily because of the way that different areas of accreditation, registration and visa issuance were linked together. ESOS, CRICOS registration and visa issuance, however, are generic mechanisms that apply across all sectors. NEAS used to provide the ELICOS sector accreditation component of this model but this has now been lost.

English Australia believes that recent regulatory reforms will result in <u>reduced</u> quality assurance for the ELICOS sector in direct contradiction of the reform's intent.

English Australia believes that for the ELICOS sector to remain internationally competitive and successful, it needs a regulatory framework that has the following features:

- consistent national approach;
- a regular and rigorous auditing regime;
- demonstrated expertise and experience in ELICOS;
- ELICOS sector specific information, procedures and communication strategies;
- streamlined and responsive processes
- strategic engagement with the sector;
- cost framework that ensures the sector remains competitive;
- protection of industry's global reputation by being internationally competitive on quality measures.

English Australia's position statement relating to ELICOS sector regulation is provided at Appendix E.

5. How well do offshore agents perform in recruiting and preparing students to study in Australia? Are the current arrangements with agents appropriate?

Education agents are critical to the ELICOS sector. We need to support them as valued partners with a tailored engagement and support strategy across all government departments and across all sectors/providers.

Fulfilment of expectations is the key to satisfaction. It is therefore in the industry's best interests to ensure that students receive accurate information to shape their expectations so that fulfilment through their actual experience is a given. English Australia agrees with the current focus on the important role played by agents in providing advice and information to students, and with the necessity of ensuring that this is done in a professional way. English Australia disagrees, however, with the recent approach taken by government in the ESOS Amendment Bill, which focused on public listings of agents and associated regulatory requirements (yet to be developed). Although an attractive solution on the surface, English Australia believes that not only does this approach not address the intent of achieving better outcomes for students, but that it also has the potential to cause long-term damage to the international education industry.

ESOS already specifies in considerable detail the scope of information that should be provided to prospective students (with sufficient flexibility to allow for this to be tailored by sector/provider etc.).

Any requirement such as this, however, is only as good as the enforcement regime. How does a regulatory body know that a provider (either directly or via an agent) is not providing appropriate information or is actively providing misleading information? Usually this information becomes available through two main sources:

- complaints from students, college staff, agents, other stakeholders;
- formal (regular) and informal (random) compliance audit processes.

The key, therefore, to ensuring the quality and accessibility of the information that is made available to students should be a defined framework for monitoring these two sources and for subsequent action to be taken to address issues identified and assure compliance with the specified requirements.

When discussing the information provided to students, English Australia would like to make two key points:

- **any requirements need to be flexible enough to be appropriate for all sectors and all markets;**
- **agents are valuable (and irreplaceable) partners in ensuring that students and their families receive appropriate information and advice.**

ESOS already specifies the relationship between providers and their agents and that providers are held accountable for the actions of their agents. It needs to be acknowledged that students have different needs for information and advice depending on the course they are studying, their sector of study and their length of study. An agent will have a very different role in terms of the kind of advice required by each of these student 'types'.

There is value therefore in attempting to apply a 'fit for purpose' approach to defining the role that agents play for each of the different client groups they work with. Migration advice is provided by migration agents, education advice is provided by education agents, and travel advice is provided by travel agents. The lines are frequently blurred between these different roles that agents undertake and yet we must try to ensure that we don't let concerns regarding appropriate migration advice impact on the requirements we set for what is in effect a travel agent. Education agents that operate in Australia and provide advice regarding visas must currently be registered as migration agents and are subject to the Migration Act. As education advice is generally tied to visa advice it is understood that education agents operating in Australia would mostly be registered migration agents and therefore operating within a regulatory framework that already exists whereby their activities can be monitored and breaches dealt with.

Understanding that the activities of agents based overseas cannot be regulated by Australian legislation, two options have been available to the Australian government. One option has been via government to government communication to encourage governments in key source countries to develop regulatory frameworks of their own to manage education agent activity. This is the case in several countries, including China for example.

The second option is via the ESOS Act, which already makes providers accountable for the actions of their agents and has the power to enforce provider compliance with this requirement. Issues raised in general regarding the lack of enforcement of the ESOS Act are valid also when considering options for ensuring that students receive appropriate advice from agents representing Australian education providers. How has the ESOS Act been enforced in relation to providers being held accountable for the actions of their agents? There has been no public evidence provided that such enforcement has occurred at all.

Education providers have commercial arrangements with varying numbers of agents depending on their profile and the range of course types they offer across different markets. This number can be relatively limited for some providers, however in some cases may number in the thousands. Providers manage these relationships within the current provisions of the ESOS Act, however they have to rely on a range of sources to get feedback regarding those agents' activities. Generally, student satisfaction surveys (usually conducted within the ELICOS sector on arrival, halfway through the course and on exit) provide the most valuable feedback to providers on the student's satisfaction with the pre-departure advice and information they received from their agent. Within the suite of Best Practice Guides developed over the years by English Australia, there is a Best Practice Guide on Monitoring Student Satisfaction which assists providers in ensuring they obtain this kind of feedback from students. Evidence of how providers have responded to feedback gained through this process could be a focus for ESOS compliance activity to assess this area of a provider's operations. DIAC, AEI and the regulators have access to a wide range of information pertaining to agent activities, including rates of fraud within visa applications, and yet this information is not currently shared with providers. International education sector peak bodies, including English Australia, have over the years suggested to these government departments that it would be extremely valuable if this information could be shared as it would allow providers to identify agents requiring disciplinary action or termination of their contract. English Australia would again propose that consideration of implementing such an arrangement should be part of Australia's strategic approach to managing this important distribution network.

Australia has again led the world in developing appropriate training programs for education agents and has encouraged agents to take the training as a way of demonstrating their professionalism to potential students and differentiating themselves from untrained agents. This has been a 'carrot' approach rather than a 'stick' approach and relies on agents looking for ways of differentiating their services in what is a highly competitive area.

The Education Agent Training Course (http://www.pieronline.org/eatc/) offered by International Education Services with the support of AEI and DIAC has worked well, with over 1,000 agents trained to date. The number of agents that have gained certification through this course is still, however, miniscule within the context of the total numbers of agents operating worldwide. A proposal has been made that all agents should be required to undergo this training and achieve certification. English Australia believes that this is an unrealistic and impractical suggestion for a number of reasons.

- Relevance: Although the PIER agent course is a great initiative, not all agents will have the need to undertake the whole course. They may study certain modules but not take the assessment required for the certificate. Many ELICOS providers have developed their own comprehensive training manuals for agents, tailored to their college and appropriate for ELICOS.
- Accessibility: Although the course is offered online and thus is easily accessible, the assessment itself is only offered in limited locations, at limited times.
- Cost: Cost is a factor, whether an agent is a small business operator, with small student numbers, or whether they have an extensive network of branches (in some cases over 60 offices, employing over 300 staff). In the latter case, the cost to train all these staff would be prohibitive.
- International education is a global industry: Many agents operate across a range of destination countries, and whilst they focus on making sure their staff have the appropriate skills and knowledge for each of these destinations, the resource required to meet formal training and assessment requirements for each one would have significant cost implications.
- New market development: Requiring agents to have PIER certification may effectively deter colleges from moving into new markets and building relationships with new agents that have never worked with Australia before. The entry benchmark for new agents would be set at a

level that might be considered "too much effort" when they can send students to other countries much more easily and without the additional cost burden for each counsellor staff member of the agency. The industry in Australia will be stifled and the growth and diversification that have been driven by the low stakes, low investment ELICOS sector will no longer be possible.

Another proposal that has been made regarding agents has suggested that agents should be required to join agent associations in their own country such as the AAERI in India. The question of agent associations is a complex one. Some countries do not have one. Other countries have more than one, eg. Turkey, and there are internal industry tensions related to how each association was established and how agents differentiate themselves from each other. Some associations have clear membership policies including a Code of Conduct, however others have no formal constitution or membership requirements and association membership is relatively meaningless. In some countries agents choose not to join an association because it is run by competitors or it does not offer 'value for money' in terms of the services it offers. Association membership levels are not high amongst agents in any source country. Any proposal to require association membership needs to consider what that membership means, whether it adds any value in relation to the advice received by students and whether different countries' associations actually meet the defining criteria. English Australia believes that the existing ESOS framework already provides the tools for holding providers accountable for the activities of their agents in a way that is appropriate to their institution, their sector, the courses they offer and the markets they operate in, and which encompass provision for a discussion about how the provider manages the training of their agents. Critical elements to ensure that the ESOS framework is effective in this particular area include:

- enforcement activity with a focus on provider management of their agents (against criteria appropriate to the institution);
- communication from DIAC and AEI regarding agent activities that cause concern.

Both governments and industry need to look beyond regulation for effective strategies to manage education agent activities that have an appropriate balance of rigour and flexibility. In this context English Australia urges the Council to take into account the fact that education agents, particularly in the English language sector, play a vital role in providing advice to students considering study in Australia and are valued partners. The English language sector is particularly dependent on education agents for recruitment, promotion and information. The 134,440 students who came to learn English in Australia in 2011 came from more than 140 different countries. English Australia member colleges include significant numbers of both public and private sector institutions and both are equally dependent on agents as a primary source of information for potential students and their families. Hence over 70% of English language students in Australia are advised by agents. To get through the application and visa processes, students and their families with limited language skills need the services of an agent. This explains why colleges devote considerable resources to developing their agent relationships. **As a country, we should be doing more to support and engage with these valued partners.**

6. What more can Australian institutions do to better prepare graduates for success in their early careers?

Effective English language and communication skills are important attributes for those graduating from a program of study within any sector of Australian education.

There needs therefore to be appropriate rigour around English language entry levels and ongoing language support. The draft English Language Standards for Higher Education developed from good practice principles also need to be firmly embedded in the required standards for vocational and higher education.[13]

English Australia also believes that there needs to be a focus on providing students with meaningful workplace experiences that will enhance their qualifications.

7. What aspects of teaching and learning in Australia's education settings contribute to a successful and satisfying study experience in Australia?

The 2011 ELT Barometer (ref. Appendix D) identifies a range of factors that are viewed as important by international ELICOS students when assessing their satisfaction with an ELICOS experience. Students were questioned about all aspects of their experience, across the three key areas of learning, living and support. The derived importance of elements of each aspect are outlined in the attached report.

B. A positive and rewarding student experience as a driver for long-term engagement

8. What means might be employed to improve international students' experiences with respect to local social activity and engagement with local students and communities?

The ELICOS sector faces the challenge of not having Australian students in the classroom to provide the opportunity for engagement for international students.

With regard to communities, however, the homestay experience is very important both logistically and culturally, particularly for ELICOS students who are vulnerable when they first arrive and it provides comfort and confidence for students and their parents that their first experience will be in a family environment. The significant majority of ELICOS students start their stay in Australia with a homestay experience. Australian families who are homestay hosts also benefit both from the cultural exchange and financially. **The Council should consider ways in which the homestay network can be recognised, supported and expanded as a benefit to the international educational effort as a whole and an alternative to the student accommodation challenge.**

As an additional support to the ELICOS sector, English Australia has developed a Best Practice Guide in Providing Student Support Services to share good practice, and despite the challenges for a sector with 100% international students, the ELT Barometer records high levels of satisfaction with the level of engagement with students from other countries.

9. How can services to support international students, such as transport concessions and health services, be provided in a more consistent manner across Australia?

There has been significant commentary on the topic of transport concessions, with the most recent reflected in research undertaken by ACPET. International students do not understand state boundaries and it is critical for Australia that we have consistent national policies in place whether these relate to access to transport concessions or to health services.

English Australia supports others in calling for transport concessions in line with domestic students and for more seamless and nationally consistent health arrangements.

[13] English Language Standards for Higher Education http://www.aall.org.au/sites/default/files/FinalEnglishLanguageStandardsMay2012.pdf

10. What, if any, further improvements need to be made to student visa and post-qualification work rules?

The Knight reforms are not yet complete. English Australia made a comprehensive submission to the Knight review outlining the need for the review to get the balance right between enhancing the integrity of the student visa program while facilitating the competitiveness of Australia's international education sector.

With regards to the student visa program, we need to ensure that the program is appropriately risk based and facilitates the flow of genuine students. The sector perceives that there are still major issues with an inappropriate assessment of 'risk'.

With regards to the post-study work rights, whilst this is an increasingly important criterion for international students and international education destinations looking to differentiate themselves, unless we focus now on ensuring that post-study work opportunities will genuinely be available for international students, we risk embarrassing failure.

We need to be starting now to build structured education provider/employer links and to be engaging with employers to educate them in the benefits of providing employment opportunities for international students.

C. Achieving sustainability in international student enrolments

11. What are the critical social infrastructure features that contribute to a vibrant international education experience for students learning, living and working in Australia? Where are the shortcomings in these?

Accommodation is one of the key issues here and the need to spread students across different areas so they don't "clump" and cause a backlash from the local community. Transport concessions are inextricably entwined with accommodation issues as this can impact on accessibility and price options for international students.

12. Is it desirable, or possible, to consider national, state and territory and/or institutional targets for a sustainable number of international students across the various education sectors?

Establishing 'targets' for international student numbers would certainly not be desirable for the ELICOS sector. The discussion paper notes that:

> *"It is important to recognise that a variety of business models operate in the education sector and that enrolment profiles differ across institutions and sectors."*[14]

As detailed previously, sustainability in ELICOS has depended on the sector being able to diversify and to maintain student flow. Despite past remarks by both Minister Evans and AEI, the 2009 numbers of ELICOS students were sustainable for the sector as ELICOS providers are accustomed to adapting to frequent changes in demand and course lengths.

A higher number of students in courses as short of four weeks are easier to accommodate than pathway students on longer courses.

Not only is there no need for targets or limits for English language students, any such restrictions would undermine the diversity of the sector which underpins its sustainability and that of international

[14] Discussion Paper – page 18

education as a whole and potentially cause such disruption to the flow of students (a 'tap on, tap off' approach) that business models would be seriously threatened.

13. What steps could Australia take to ensure that any further increase in international student numbers does not place unacceptable pressure on our social infrastructure?

Some steps have already been taken, including those that allow for closer monitoring through PRISMS and CRICOS of a provider's student population in relation to the numbers they have been approved to enrol.

Other provisions already exist within the ESOS Act and National Code to ensure that providers support their international students appropriately with regard to welfare arrangements.

D. Offshore education delivery contributes to Australia's reputation as a provider of high quality and a partner of choice

14. How can an international education strategy help institutions to capitalise on transnational education opportunities?

While English Australia's focus is on inbound ELICOS students it is significant that a number of English Australia members are global education providers, with some establishing operations in Australia as a gateway to Asia. The Council should take cognisance of the growing role played by global providers, for example, their experience operating in different markets is invaluable for providing information on comparative conditions, regulation and costs.

The only other comment that English Australia would make on the transnational context is that it requires a degree of maturity from the provider and that the potential for reputation damage to Brand Australia is considerable unless there are appropriately monitored quality assurance structures in place.

English Australia believes that it was a mistake for the Knight review to encourage the VET sector to look offshore rather than onshore until these quality assurance frameworks are in place.

E. Positioning Australia as a partner of choice for education and collaboration in the Asian region and beyond

15. How can Australia capture the opportunities emerging from the rise of the Asian Century while seeking geographical diversity in its international education engagement?

It is important to acknowledge the importance of Australia being an English speaking country geographically located within the Asia region. Asian governments are increasingly including English language skills and cross-cultural skills as key goals in their national strategic and developmental plans and as key factors contributing to their global competitiveness and the future economic success of their countries.

We need to leverage this not just within Asia itself but also with non-Asian nations as they seek to engage with Asia and ensure their young people are Asia literate whilst also developing the same English language and cross-cultural skills.

It is also important to acknowledge the role that the ELICOS sector plays both in opening up new markets as referenced earlier in this submission.

We are a low risk sector that allows students to 'sample' Australia's educational offerings without a high level of financial investment. The importance of short courses on visitor and working holiday visas cannot be underestimated when looking at the life-cycle of the international student. We need to ensure that we have a well integrated and coherently promoted program of visa options for visitors looking to combine study, travel and work options that will facilitate this entry to short language programs and travel experiences. **We need the Working Holiday Program to be opened up to more countries** rather than only using the Work & Holiday Program for new countries – a program with limited popularity due to excessive constraints relating to language skills, educational background and government support. We need to **explore further the interface between education and tourism** and to deregulate our short course visa program, to allow for greater mobility within this type of program. This would be supported by upgrading the ABS and AEI statistics to incorporate non-student visa entrants and **building a reliable data base that can be agreed on and utilised by both international education and tourism providers and agencies**.

16. How can we encourage more students to learn an Asian language and to develop their Asia literacy?

The very existence of the international education industry helps to promote Asian literacy as international students sit in our classes alongside Australian students. **What is needed are more structured opportunities for students to engage outside the classroom**.

F. Preparing Australians for a changing global and economic environment

17. How can the sector and governments work together to encourage, support and increase the outbound mobility of Australian students and academics?

Whilst encouraging, supporting and increasing the outbound mobility of Australian students is an area of focus that English Australia would strongly endorse, it is not an area that the ELICOS sector can contribute to as our student body is comprised solely of international students.

G. Strengthening the science and research collaboration of Australian education institutions through international linkages

18. How do we use the high quality and international nature of Australia's science and research to strategically position Australia as a destination of choice for the world's best and brightest?

No comment.

19. What additional incentives might be provided to increase international research collaborations?

No comment.

H. Australia’s reputation as a provider of high quality education is enhanced through international cooperation and promotion

English Australia contributes to the work of enhancing Australia’s reputation as a provider of high quality education through a range of mechanisms.

With a specific focus on the quality of our English language sector and student satisfaction levels, we have (with government funding support through AEI) conducted two sector-wide benchmarking surveys of the student experience (in 2009 and 2011), both of which have reported high levels of student satisfaction (ref. Appendix D). English Australia has taken an active role in promoting the outcomes of this research throughout our international networks.

With a focus on the classroom and the pedagogy of language teaching, English Australia has for the last three years undertaken a project supported by Cambridge ESOL to promote and share classroom based action research.[15] Research reports from the 2011 Action Research in ELICOS Program have been published in Issue 48 of Cambridge ESOL 'Research Notes', making them accessible to a global audience.[16]

English Australia also works collaboratively with other language school associations worldwide through a body called GAELA[17] (the Global Alliance of Education and Language Associations) which was formed in 2000.

GAELA’s aims are as follows:

- To forge bonds between associations promoting language learning by study abroad and provide a forum for exchange of information.
- To promote and improve the profile of study abroad for the purposes of language learning and cultural understanding.
- To promote the adoption of comparable standards in language teaching and aim to ensure, for the benefit of students, regulation of providers where there is none.
- To present views to governments on topics such as regulation and quality assurance and student mobility, drawing on international comparisons and evidence.
- To collect information and data on the “language learning by study abroad sector” of the education market.
- To share initiatives to develop professionalism in all areas of language learning by study abroad.
- To communicate with bodies representing language travel agents on issues of mutual importance, with the aim of improving the quality of service to students.

20. What priorities should Australia be addressing in its marketing and promotion to best support the international education sector?

Recent weeks have seen a great deal of media (and social media) focus on the next phase of Tourism Australia’s “There’s Nothing Like Australia’ promotional campaign. Not only has this gained global coverage but Australia’s own population is a key audience for this promotion. There is currently no comparison between the level of funding provided to Tourism Australia to promote Australia as a tourism destination and that given to Austrade to promote Australia as a destination for international education. There is also no comparison between the level of public recognition given to tourism compared to international education as a valuable ‘industry’ for Australia.

[15] http://www.englishaustralia.com.au/action-research-program
[16] http://www.cambridgeesol.org/rs_notes/rs_nts48.pdf
[17] www.gaela.org

Whilst acknowledging the work being done by Austrade in this area over the last year since taking on the promotional role, it is English Australia's view that Austrade is severely handicapped by a lack of appropriate funding.

It is critical that we have a national focus on Brand Australia to underpin individual sector and provider initiatives, however **this needs to be funded better and needs to engage with the industry in a more comprehensive way to ensure that it delivers the strategies and outcomes that the industry believes to be important**. Prior to handing over promotional responsibilities to Austrade, AEI established an Industry Promotional Advisory Board. Whilst consulting on separate projects through different mechanisms, there is currently no sustained consultation mechanism that ensures that the industry perspective is being taken into account. Austrade is therefore seen as not necessarily being in touch with the priorities of the industry.

Two areas are critical for the ELICOS sector in its promotional efforts, data and agents.

The ELICOS market shifts very quickly in response to changes in the external environment and therefore relies very heavily on up-to-date data. Whilst Australia leads the world in the collection and reporting of international student data, we underperform in how we actually analyse and utilise this data to identify trends and opportunities. For some years now, English Australia has been championing **the need for an industry/government Data Working Group to identify what data we have, what more is needed and how it should be used to support the industry**. The response from the Departments of both Innovation and Immigration, as well as Austrade, has been underwhelming.

With agents playing such a key role in advising international students, **we must have a clear national strategy for engaging with agents**, not with a view just to trying to 'control' the quality of advice they give to students, but with a view to engaging with them as valued partners in delivering our goals as a nation for international education. Agents must be considered as a key stakeholder in any kind of communications strategy that Australia undertakes.

The industry is exhausted by the extent and complexity of recent reforms.

It is important to note that the responsibility for promotion was only transferred from AEI to Austrade on 1 July 2011, less than a year ago. Whilst welcome, this involved providers in seminars, workshops and other consultations on top of the processes generated by the Baird, Knight and COAG reviews. It should be recalled that the Austrade change came about as a result of the Bradley higher education review which also had a major impact on international education regulation by recommending separation of the policy and regulatory functions as well as the marketing and promotion.

Promotion cannot be undertaken in isolation from the policy drivers that impact on how Australia is perceived by the rest of the world. Promotion was handed over to Austrade at a time when the Baird, Knight and COAG student experience reviews were driving substantial changes alongside structural reform to the regulatory framework (driven by the Bradley Review and resulting in the establishment of ASQA and TEQSA) as well as changes to Australia's skilled migration program.

There certainly would be benefit from a governance model which centralised responsibility for international education around one minister and a unified government structure whether departmental and/or statutory authority, with the promotional role undertaken by Austrade integrated more fully.

As outlined above in this submission, **we need to invest in the infrastructure, industry development, consumer protection, and an effective visa program that will support our industry going forward**.

Final comments

None of the themes and/or questions in the discussion paper address the key question of what kind of mechanism is needed to ensure that whatever strategy is developed as a result of the work of the International Education Advisory Council and this consultation process will be appropriately implemented S**ome kind of structure/mechanism is essential to ensure that both industry and governments have a stake in the outcomes and have ownership of the process**.

The industry needs a dedicated body such as Tourism Australia/Education NZ/British Council as well as the kind of government recognition and focus that would be given by having a dedicated Minister or at the least a Parliamentary Secretary reporting to the Prime Minister. Only then will we have a clear focus on delivering what needs to be done.

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[submission authorised by the Council of English Australia]

About English Australia & the ELICOS Sector

- English Australia, formerly known as the ELICOS Association, is the national peak body and industry association for the English Language Intensive Courses for Overseas Students (ELICOS) sector. English Australia was established in the early 1980's and incorporated in 1990.
- English Australia represents over 100 member colleges, with over 130 registered centres across Australia. English Australia has both public sector (eg. attached to a university or TAFE) and independent language centres amongst its membership.
- Over 80% of international students learning English in Australia choose to study with an English Australia member college.
- The ELICOS sector accounts for about ten per cent of Australia's export earnings for international education, contributing over $1.5 billion in 2011[18] out of a total of more than $15 billion for the industry as a whole.
- Although only contributing 10% of export earnings, the ELICOS sector is the largest of all education sectors in terms of the numbers of new international students commencing courses each year.
- Following five consecutive years of growth, peaking at 162,114 students in 2008, the English language sector in Australia has now seen three years of declining numbers. In 2011, 134,440 international students undertook English language courses in Australia. 54% of these held student visas, 24% visitor visas and 22% working holiday and other visas[19].
- The ELICOS sector plays an important role in preparing international students for successful study in other sectors. Recent AEI data[20] shows that approximately 66% of student visa holders completing English language courses in 2010 continued through to further study in other sectors. Another way of looking at the data is that 30% of higher education students and 39% of VET students studied English language courses immediately prior to commencing further study.
- The ELICOS sector also plays a key role in delivering English language courses to students without further study goals, but who see improved English language skills as a key contributor to their future success in a world where English language skills and an overseas cross-cultural learning experience are seen to give competitive advantage in an increasingly globally connected world. Applying the AEI data for pathways shows that if all visa holders are included, the majority (64%) of ELICOS students are in Australia with English language study as the primary goal.
- The ELICOS sector has a 100% international focus as it provides courses only to students from overseas and has no domestic education focus.
- The ELICOS sector is highly vulnerable to changes in the external environment, with short courses (the average course length in 2011 was 11.2 weeks) and short lead-times for enrolments.

[18] English Australia Survey of Major ELICOS Regional Markets in 2011
[19] English Australia Survey of Major ELICOS Regional Markets in 2011
[20] AEI Research Paper "Study pathways of international students in Australia" May 2012

Appendices

Appendix A

English Australia Fact Sheet – Global Language Travel

Appendix B

English Language Fact Sheet – ELICOS Industry Statistics 2011

Appendix C

English Australia Survey of Major ELICOS Regional Markets in 2011 – Executive Summary

Appendix D

English Language Barometer Australia 2011 – Executive Summary

Appendix E

English Australia Position Statement – ELICOS Sector Regulation

English Australia Fact Sheet
Global Language Travel

ENGLISH AUSTRALIA
QUALITY | SUPPORT | ASSURANCE

Background

The only source of data that compares the performance of destination countries for English language training is *Study Travel Magazine*, a publication of *Hothouse Media* (based in the UK). Every year the publication researches a report which attempts to assess the global picture for English Language Teaching exports. The latest report is for **2010**, with 2011 information becoming available in November 2012.

The motivations for travelling overseas to learn English are many and varied. English language students may want to continue studying at an English medium high school, vocational college or university; travel or work in an English speaking country; gain a qualification that gives them entry to improved work or study options at home or better access to cultures where English is the lingua franca.

Global Language Travel in 2010

An estimated **1,423,379** international students travelled to an English speaking country to learn English in 2010, a decline of -3.1% from the 1,469,171 who studied in 2009.

The number of weeks studied showed an even stronger decline of -6.2%, from 12,489,626 to 11,717,450. This makes three consecutive years of decline for the global ELT industry, which peaked in 2007 with 1,519,376 students.

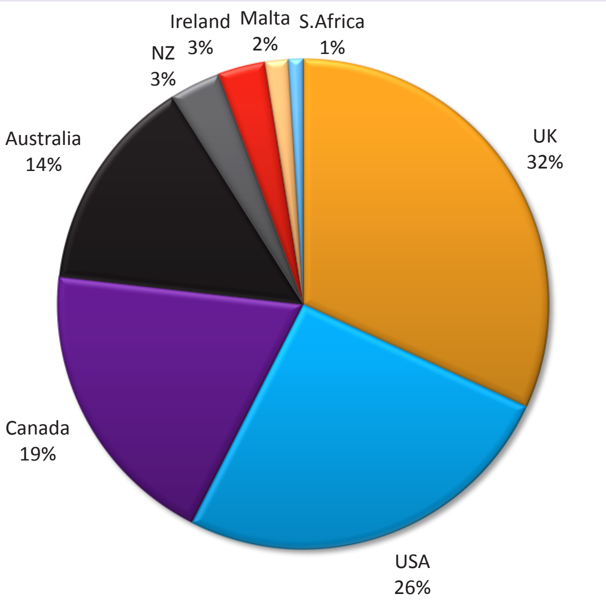
English language travel generated expenditure of over **US$10.5 billion** in 2010.

The UK has the greatest market share in relation to the number of student weeks. **Australia is in fourth place** after the UK, USA and Canada.

The UK, Canada and Malta gained market share in 2010 at the expense of all other countries.

The five years to 2008 saw **Australia** increasing its share of the global market from 8.8% in 2003 to a peak of 16.6% of student weeks in 2008; however this share has declined over the last two years to **14.2% in 2010**.

The top 4 countries now receive 91% of student weeks, with the share of the other 4 destinations dwindling in comparison.



2003	2004	2005	2006	2007	2008	2009	2010
UK 41	UK 44	UK 44	UK 31	UK 30	UK 30	UK 29	UK 32
USA 19	USA 19	USA 18	USA 24	USA 23	USA 24	USA 27	USA 26
Canada 16.2	Canada 15.3	Canada 15.2	Canada 16.7	Canada 17.3	Canada 17.6	Canada 19.0	Canada 19.3
Australia 8.8	**Australia 10.4**	**Australia 10.7**	**Australia 13.3**	**Australia 14.4**	**Australia 16.6**	**Australia 15.7**	**Australia 14.2**
Ireland 7.4	NZ 6.3	Ireland 6.4	Ireland 8.4	Ireland 8.9	Ireland 5.1	NZ 3.7	NZ 3.3
NZ 5.7	Ireland 3.1	NZ 3.4	NZ 3.6	NZ 3.5	NZ 3.8	Ireland 2.5	Ireland 3.1
Malta 1.3	Malta 1.7	Malta 1.4	S.Africa 1.8	Malta 1.8	Malta 1.8	Malta 1.6	Malta 1.6
S.Africa 0.8	S.Africa 0.8	S.Africa 0.8	Malta 1.6	S.Africa 1.2	S.Africa 1.2	S.Africa 1.1	S.Africa 0.9

A strong regulatory framework, attractive lifestyle, quality schools and the ability to work part-time for students are primary reasons for Australia's ongoing appeal as one of the top 4 destinations for English language study. "Australia has established a very strong niche in the market and has a clear identity in terms of the educational product and opportunities offered to international students," affirms Sue Blundell, Executive Director of English Australia, who says, "the Australian profile is based on nationally consistent quality standards, strong consumer protection mechanisms, a rewarding lifestyle and natural environment and a culture that allows learners to grow and explore within the learning environment."

2010 – Average course length (weeks):

As a "long-haul" destination, Australia is in the top three countries when average course length is compared. This longer average course length combines with consistent numbers throughout the year (no real peaks/troughs) to give a degree of stability to the industry in Australia.

	2004	2005	2006	2007	2008	2009	2010
USA	**11.5**	**12.0**	**12.7**	**12.2**	**12.6**	**12.8**	**14.2**
Australia	**10.9**	**11.3**	**10.9**	**12.0**	**12.5**	**12.6**	**11.9**
Canada	**10.3**	9.1	8.2	8.2	**10.4**	**12.3**	**11.9**
NZ	**11.7**	**10.2**	**10.4**	**10.1**	**12.4**	**11.1**	9.5
S.Africa	6.3	6.0	11.3	8.1	6.7	6.5	6.7
UK	6.8	8.0	5.3	5.3	5.6	5.9	5.7
Ireland	3.1	6.0	6.2	7.6	5.3	3.3	3.8
Malta	2.9	2.4	2.4	2.4	2.6	2.5	2.5
	7.8	**8.5**	**7.3**	**7.5**	**8.1**	**8.5**	**8.2**

2010 – Average spend per week (US$):

Currency fluctuations, cost of living variations and pricing strategies contribute to strong variations in the affordability of English language study and associated living expenses across the various destination options. Despite recording the strongest increase in the average spend per week for students, Australia continues to offer quality English training at a competitive price.

	2006	2007	2008	2009	2010	change
USA	**1,099**	**1,080**	**1,232**	**1,185**	**1,092**	**-8%**
Ireland	**938**	**1,384**	**1,292**	**1,183**	**875**	**-26%**
USA	**976**	912	991	830	**849**	**+2%**
Canada	**697**	**721**	**1,029**	**870**	**801**	-8%
Australia	634	740	908	681	786	+15%
NZ	593	665	709	669	698	+4%
Malta	824	847	908	683	653	-4%
S.Africa	571	842	744	516	560	+8%
	895	**918**	**1,056**	**915**	**898**	**-2%**

Further Information

English Australia provides data regarding the Australian English language industry to *Study Travel Magazine* each year as part of *Study Travel Magazine*'s research into developing an annual report on global language travel trends.

The annual report is published in the December issue of *Study Travel Magazine* and can be viewed online at www.hothousemedia.com.

English Australia Fact Sheet
ELICOS Industry Statistics 2011

ENGLISH AUSTRALIA
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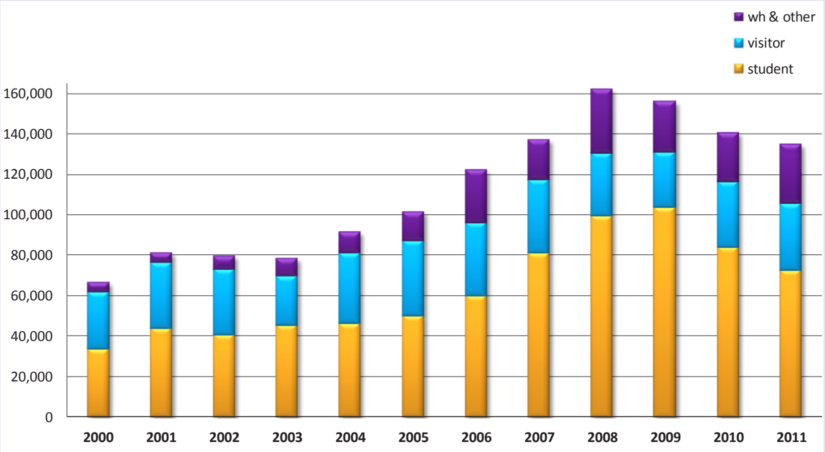
A total of **134,440** international students commenced English language programs in Australia in 2011.

Numbers of English language students in Australia **doubled in the five years between 2003 and 2008**, however **declined by 4% in 2009, by 10% in 2010 and by a further 4% in 2011**.

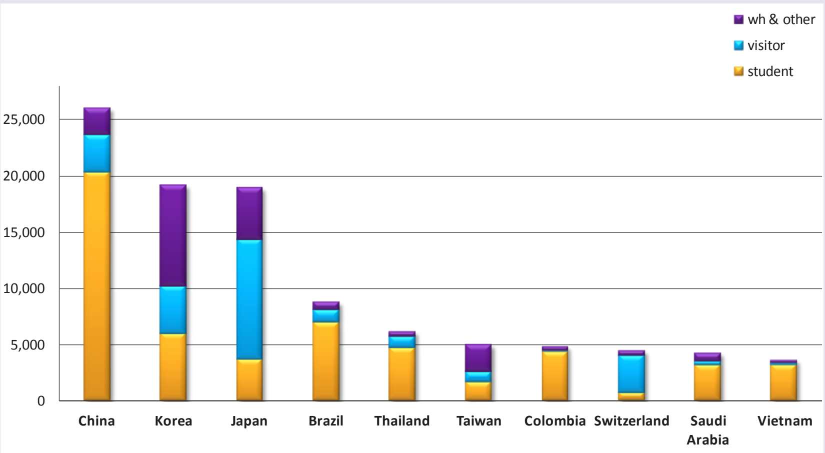


54% of English language students held Student visas in 2011, 24% were visiting on Visitor visas and the remaining 22% utilised Working Holiday & Other visas.

It is estimated that approximately 41% of all English language students will pathway through to other education sectors, whilst the other 59% undertake an English language course for a variety of other reasons including tourism and career enhancement.

English language students came from over **140 different countries in 2011**. 65% of English language students came from Asia, with 16% from Europe, 12% from the Americas and 6% from the Middle East.

The **top ten source countries for 2011** are shown in the following chart



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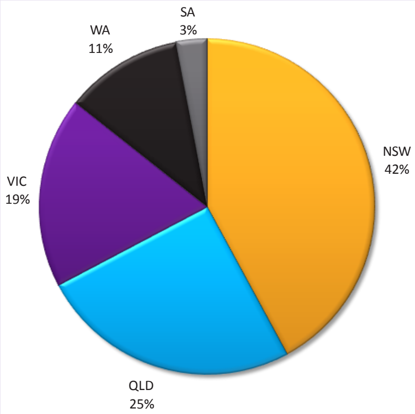
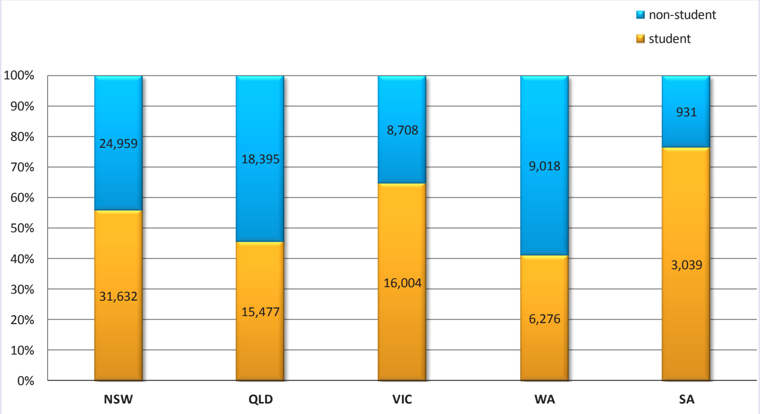
Non-Student visas are a particularly important option for English language students from South Korea, Japan and Taiwan as well as most western European countries.

Only one of the top ten source countries for ELICOS showed increasing numbers in 2011 – Japan.

The strongest growth in terms of student numbers came from Italy (+1,013), Hong Kong (+559), Spain (+226) and Japan (+170). The strongest decline came from China (-1,817), France (-1,532), Vietnam (-1,020) and South Korea (-902).

New South Wales was the destination for the largest numbers of English language students in 2011, followed by Queensland and then Victoria. Queensland and Western Australia have particularly large numbers of English language students using Visitor, Working Holiday and Other visas.





The average length of an English language course in 2011 was **11.2 weeks**. Student visa holders studied on average for 15.3 weeks, Visitor visa holders for 4.6 weeks, Working Holiday visa holders for 8.5 weeks and Other visa holders for 9.1 weeks.

Individual enrolments accounted for 89% of all enrolments. Group enrolments accounted for 11% of the total, with most group enrolments coming from Asia.

The total economic impact of the tuition fees and additional spending of international English language students in 2011 was **Aus$1.462 billion**.

This represents an **average spend per student of Aus$10,873**.

Further Information

The Australian government, through Australian Education International (AEI) provides support funding for English Australia to research and produce an annual *Survey of Major ELICOS Regional Markets*. The purpose of the study is to gain a clear picture of the profile of overseas students and visitors who undertake English language studies in Australia each year. Statistics are obtained on:

- student numbers by nationality;
- student numbers by visa type;
- numbers of individual and group enrolments;
- length of enrolments; and
- enrolments in each state or territory.

The **Executive Summary** is available to all interested stakeholders at no charge and can be downloaded from the English Australia website at www.englishaustralia.com.au. The full **Report**, with detailed tables and charts, is available free of charge to all colleges that participate in the survey and to government departments. The full **Report** is also available to other interested parties for purchase from the Secretariat.

English Australia

Survey of major ELICOS regional markets in 2011

May 2012

ENGLISH AUSTRALIA

QUALITY | SUPPORT | ASSURANCE

Survey of major ELICOS regional markets in 2011

Executive Summary

of a report prepared for English Australia by Environmetrics

May 2012

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The Commonwealth Department of Industry, Innovation, Science, Research and Tertiary Education (DIISRTE) has provided financial support for the preparation of this survey.

Introduction

This is the sixteenth survey of the ELICOS sector commissioned by English Australia. A benchmark study was commissioned in 1996, which covered enrolment statistics for the previous calendar year. A follow-up study was conducted in 1997. Austrade undertook these two studies. This current study is the fourteenth undertaken by Environmetrics and covers enrolments for the 2011 calendar year.

The purpose of the study is to gain a clear picture of the number of overseas students and visitors who undertook English language studies in Australia in 2011. Particular attention is taken to obtain statistics on:

- student numbers by nationality;
- student numbers by visa type;
- numbers of individual and group enrolments;
- length of enrolments; and
- enrolments in each state or territory.

This report presents the main findings of the study. Data is analysed to provide an overall profile of the ELICOS sector, as well as a profile for Asia, Europe, Central and South America and the Middle East.

Executive Summary

Total enrolments (all nationalities, individuals and groups)

- 2011 saw overall ELICOS enrolments decline by -4%, dropping to 134,440 from 140,102 in 2010. The ELICOS market peaked in 2008 with 162,114 enrolments after growing consistently over a five year period from 78,338 in 2003. The sector has now experienced three consecutive years of decline (2009: -4%, 2010: -10%, 2011: -4%).

- The growth experienced prior to 2009 was generated by increasing numbers of Student visa holders. In 2010, Student visa numbers declined by -19%, and in 2011 this trend continued, with Student visas declining by -13% (11,154). All other visa types increased in 2011 on 2010 numbers. Other visas increased by +98% (5,130), Working Holiday visas by +1.1% (207) and Visitor visas by +0.5% (156), although this growth could not compensate for the decline in Student visas.

- The decline in Student visas has impacted the visa profile of the market with the share of Student visa dropping from a peak of 67% in 2009 to 60% in 2010 and to 54% in 2011. Visitor visas accounted for 24% of ELICOS students in 2011, Working Holiday for 14% and Other visas for 8%..

- With the ELICOS market shifting from the longer study period Student visa holders to shorter study period visa types, the average number of weeks studied per student decreased again this year, from 11.9 in 2010 to 11.2 weeks in 2011.The average course length ranged from a low of 4.0 weeks for Asian students on Visitor visas, to a high of 19.8 weeks for Middle Eastern students on Student visas.

Survey of major ELICOS regional markets in 2011

APPENDIX C

- In 2011 the number of weeks spent studying declined by -9% to 1,510,703 weeks from 1,668,328 weeks in 2010, reflecting both the decline in student enrolments and the shift in the visa profile and average course length.
- The decrease in the number of students and weeks studied resulted in a decrease in total spending. The total impact of all enrolments decreased from 1.557 billion in 2010 to 1.462 billion (a decrease of -6%)
- All regions, with the exception of Africa, declined in 2011. Student numbers from Asia declined by -4% (-3,395), Central and South America declined by -3% (-473), Europe declined by -3% (-652) with the Middle East declining the most with -13% (-1,189).
- The regional share profile of the market has changed little in 2011 from 2010. Asia remained the largest source of enrolments, accounting for 65% of the total (the same as in 2010). Europe maintained its share of 16%, as did the Americas with 12% in 2011. The Middle East increased share from 6% to 7%.
- In 2011 different states experienced very different levels of growth/decline. Western Australia had strong growth of +19% (2,491). NSW +1% (531) and Victoria -1% (-153) had little change, with South Australia -24% (-1,255) and Queensland -18%(-7,276) both declining significantly.
- NSW accounted for 42% of all enrolments in 2011, followed by Queensland (25%), Victoria (18%), Western Australia (11%) and South Australia (3%). NSW and Western Australia increased market share at the expense of Queensland and South Australia.
- Asia was the most important source region for all states. China is the most important source country for NSW, Victoria and South Australia. Japan is the most important source country for Queensland and in Western Australia China, Japan and Korea each have equal share (14%).
- The top ten source countries for 2010 were (in order): China, South Korea, Japan, Brazil, Thailand, Taiwan, Colombia, Switzerland, Saudi Arabia and Vietnam. Vietnam replaced France in the top 10.
- China was the major source country in 2011 with 19% of the market, though share dropped 1% from 20% in 2010. China showed declining enrolment numbers of -7% in 2011.
- South Korea and Japan each have 14% share of the market. Korea has been in second place since 2008 when China became the most important source country. Korean student numbers have been declining since 2009 and in 2011 decreased by a further -5%.
- Japan increased enrolments in 2011, strengthening its ranking position and now equal with Korea in second position. Japan had been in continuous decline since peaking in 2004/2005, but in 2010 and 2011 has returned to growth (unlike most nationalities). Growth in 2011 was a modest 1%.
- As with 2010 forty eight percent of all ELICOS enrolments in 2011 came from the top three source countries. Seventy five percent came from the top ten source countries (the same as in 2010).
- Japan, with a modest increase of 1%, was the only nationality in the top ten source countries for ELICOS to grow in 2011. All, other top 10 countries declined in enrolments in 2011. Vietnam decreased the most with a 22% decline on 2010.
- The strongest growth in terms of student numbers came from Italy, Hong Kong and Spain, with the strongest growth in weeks and revenue coming from Japan.

- The strongest decline in student numbers came from China ,France, Vietnam and Korea, with the strongest decline in weeks and revenue coming from Saudi Arabia.
- Group enrolments accounted for 11% (up from 9% in 2010) of the total number of students, however they only accounted for 3.5% of student weeks, with an average course length of 3.6 weeks. Numbers of group enrolments grew by 21% with a 26% increase in student weeks.
- Asian nationalities again dominated group enrolments with 96% of the total (increasing from 91% in 2010). Japanese students made up 49% of these (down from 53% in 2010).
- English Australia member colleges accounted for 83% of total enrolments.

Asia-Pacific region total enrolments (individuals and groups)

- Total numbers of enrolments for the Asia Pacific region decreased from 91,025 in 2010 to 87,630 in 2011. This represents a decrease of -4% (-3,395).
- The largest increase in the number of enrolments for an individual nationality was shown by Hong Kong (559), followed by Japan (170)) and then Indonesia (146).
- The largest decrease in the number of enrolments for an individual nationality was shown by China (-1,817), then Thailand (-1,275) followed by South Korea (-902).
- For the fourth consecutive year China was the most important source country in the Asia Pacific region, contributing 30% of the region's total enrolments. South Korea and Japan share second place with 22%.
- In 2011 the state profile changed somewhat, with NSW still dominant and increasing, accounting for 41% of all Asian enrolments in 2011, Queensland declining to 24% (from 28%), followed by Victoria increasing to 21% (from 20%), Western Australia increasing to 11% (from 8%) and South Australia declining to 3.6% from 4.5%.
- The proportion of Student visas declined to 52%, with Visitor visas increasing to 25%, Working Holiday visas increasing to 16% and Other visas to 7%.
- Total student weeks decreased from 1,025,006 to 953,817 in 2011 (a -7% decrease), with the average number of weeks spent studying decreasing to 10.9 (from 11.3 in 2010).
- China (35%) and South Korea (21%) accounted for the largest number of student weeks in 2011.
- Total estimated spending of enrolees from the Asia Pacific region was $950 million compared with $981 million in 2010. This is an overall decrease of -3% from 2010.
- The number of Asian students in groups increased from 11,200 to 14,254. The average number of weeks for groups increased from 3.2 to 3.5 weeks.

European region (individuals and groups)

- Total numbers of enrolments from Europe decreased from to 22,542 in 2010 to 21,890 in 2011. This represents an decrease of -3% (-652).
- The largest increase in the number of enrolments for an individual nationality was Italy (1,013), followed by Spain (226) and then Russia (108). France (-1,532) experienced the largest decline in enrolments followed by Hungary (-155).
- As in previous years Swiss enrolments made up a large proportion of the European market, accounting for 20% (a decline of 2% on 2010), followed by Italian enrolments, with 16%. Italy in 2011 overtook France and Germany to become Europe's second most important source country. Spain overtook the Czech Republic in importance as its numbers also grew strongly.
- Market share by state has changed somewhat for Europe in 2011, with NSW gaining 4% to achieve 52% of all European enrolments whilst Queensland's share declined strongly by 8% to account for 25%. Western Australia's share increased from 11% to 14%, Victoria's from 7% to 8% and South Australia remained unchanged on 1%.
- Visitor visas are still the most popular choice for European enrolees, though in 2011 they decreased by 6% to 38% after increasing to 44% in 2010. The proportion of Student visas has increased marginally to 34% (from 33%). The proportion of Working Holiday visas has increased in 2011 to 21% from 19%, returning to the same level as in 2009 and Other visas also increased to 8% (from 4% in 2010).
- The total number of weeks enrolled has decreased from 200,489 in 2010 to 184,985 in 2011 (a decrease of -8% - a stronger decline than overall student enrolments). This stonger percentage decline in weeks was caused by the average number of weeks in a course declining by 0.4 of a week to 8.5 weeks.
- Total estimated spending of European enrolees was $167.1 million compared with $174.9 million in 2010. This is an overall decrease of 4% from 2010.

Central and South American region (individuals and groups)

- Total numbers of enrolments from the Central & South America region decreased from 16,929 in 2010 to 16,456 in 2011. This represents a decrease of -3% (-473).
- Brazil again yielded the largest number of enrolments, representing 53% (identical to 2010), of all enrolments from this region (a total of 8,758 enrolments for 2011 though declining -3% on 2010). The second most important source country, Colombia, declined -2% on enrolments in 2010, with Chile increasing by +19% on 2010.
- NSW accounted for 42% of all Central and South American enrolments in 2011 (40% in 2010), Queensland's share decreased from 34% in 2010 to 31% in 2011, Western Australia's rose from 10% to 12%, whilst Victoria's remained stable on 14% and South Australia also remained stable at 2%.

- 82% of all Central and South American enrolees held Student visas (slightly down from 85% in 2010), with 9% arriving on Visitor visas (10% in 2010) with Other visas now accounting for 8% (up from 5%) and Working Holiday visas accounting for less than 1% in 2010 (equal to 2010).
- There has been a -9% decline in the total number of student weeks (from 253,675 to 231,956), with the average number of student weeks declining to 14.1 (15.0 in 2010).
- Total estimated spending of Central and South American enrolees was $201.4 million compared with $214.2 million in 2010. This is an overall decrease of -6% from 2010.

Middle Eastern Region (individuals and groups)

- The Middle Eastern region declined more than any other region in 2011 in percentage terms after experiencing steady growth since 2007. Total enrolments for the Middle Eastern region in 2011 were 8,067, representing a decline of -13% (-1,190) on 9,257 in 2010.
- Saudi Arabia contributes 52% (4,175) (up 1% from 2010) of all enrolments from the Middle East. In 2011 actual enrolment numbers declined by -12% (from 4,754 to 4,175) from Saudi Arabia.
- The largest Middle Eastern contributors were Saudi Arabia and Turkey (decrease of -32%) with most key Middle Eastern countries showing decreasing enrolments in 2011. There were increases from students from Egypt (23%), Jordan (15%) and Pakistan (14%) though on smaller bases.
- In 2011 there was strong change in the share of the states compared with 2010. Queensland increased its share by 7% to 30%, moving into second place ahead of Victoria on 25% (dropping from 26% in 2010). NSW remained the top source country however its share declined 6% to 32%. The share for Western Australia (8%) and South Australia (5%) remained stable.
- 78% of all Middle Eastern enrolments held Student visas, down from 84% in 2010. The number of Other visas increased strongly in 2011, increasing from 6% to 15%. The proportion of Visitor visas decreased to 7% (from 10%).
- The total number of student weeks for Middle Eastern enrolments was 137,417 (a decrease of -26% or -48,842), and the average number of student weeks declined 3 weeks to 17.0 (down from 20.1 in 2010) underlying the decrease in total weeks.
- The total estimated spending of Middle Eastern enrolees was $140.4 million (down from $184.5 million in 2010). This is an overall decrease of -24% on 2010.

English Language Barometer

Australia

2011

Executive Summary

March 2012

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Australian Government
Australian Education International

The Australian ELB 2011 was generously supported by the Commonwealth Department of Industry, Innovation, Science, Research and Tertiary Education (DIISRTE)

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Background

The 2011 Australian English Language Barometer (ELB) was undertaken from 3^{rd} October to 25th November 2011 across 49 English language colleges in Australia to capture opinions of the international student cohort.

The survey, analysis and reporting is independently administered for English Australia by the International Graduate Insight Group (i-graduate).

Findings are benchmarked against the 2009 Australian ELB dataset to show changes in opinion and experiences over this two year period. The lists of participating institutions in 2009 and 2011 are included in the appendices. The 2011 Australian ELB findings are also compared to the 2011 Australian International Student Barometer (Aus ISB 2011) – a study of satisfaction amongst a broader group of international students at 28 Universities in Australia which was undertaken from 14^{th} March to 20th May 2011.

This executive summary includes a breakdown of the profile of the respondent group, areas of key strengths and weaknesses against the benchmarks, and a number of tables and graphs.

Throughout this summary and the presentation, percentages are rounded to the nearest whole number.

Profile and response

The second Australian English Language Barometer was undertaken in 2011 with 49 English language colleges participating. The participating colleges represented an excellent cross-section of different provider "types", including private colleges as well as those attached to a university. Providers from every state & territory signed up for the project.

Nearly 9,000 students participated in the 2011 survey. The response rate was excellent at 66%, more than double the response rate for the ISB.[1]

In 2010 (the latest full year data available) over 140,000 students studied ELICOS programs in Australia. While the actual number of ELT students enrolled in any quarter varies, this is approximately 25 percent of the total enrolment. Students may be on student visas (approximately 60 percent of the cohort); tourist visas (23%); or working holiday & other visas (17%). The response rate is estimated at 26 percent of the total ELT enrolment during the survey period, and 66 percent of the enrolment in the participating colleges (compared with 50% in 2009). While acknowledging the limitations of these estimates, it is clear that the data relates to a significant sample of the total numbers of ELICOS students enrolled in at the time the ELB was conducted.

[1] Three schools were unable to calculate the number of students that their survey was sent to. Therefore, the

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Although there are some variations in the profile of the sample compared with that of the general ELT population, generally the sample provides a valuable source of feedback on the student experience. Particular questions, however, may need to be analysed with the variations identified below in mind.

2010 ELT student population[2]	**Australian ELB 2011**	**Comments**
140,102 = 35,000 per quarter	8,722	Estimated approx 26% of student population
60% student visas 40% non-student visas	87% student visas 13% non-student visas	Students on non-student visas are under-represented in the sample. These students generally are on short courses and may not have the incentive to respond to a survey such as this. This was a similar issue for the 2009 ELB.
China 20% South Korea 14% Japan 13% Brazil 6% Thailand 5% Taiwan 4% Switzerland 4% Colombia 3% Saudi Arabia 3% France 3% Vietnam 3% Italy 2% Germany 2% Indonesia 1%	China 34% South Korea 8% Japan 8% Brazil 4% Thailand 3% Taiwan 4% Colombia 3% Saudi Arabia 8% Vietnam 4% Indonesia 2%	In general most of the top source nationalities are represented in the sample. One significant exception are European countries. Either the colleges participating in the survey did not have European students enrolled or this cohort of students chose not to respond. Students from Saudi Arabia are over-represented in the sample, with South Korea and Japan under-represented.
Average course length = 11.9 weeks	27% studying more than 24 wks 37% studying 13-24 weeks 36% studying less than 13 wks	Students on longer courses are over-represented in the sample. They would have more invested in their course and would be more likely to respond to a survey than students on short courses.
Analysis of AEI pathway data indicates that approximately 40% of ELT students will transition to further study in another education sector.	48% EAP 36% General English 16% Other	The sample seems to be generally representative of the overall ELT sector profile, with a slight over-representation in academic pathway English.

[2] English Australia Survey of major ELICOS regional markets in 2010 (May 2011)

The majority of students were of Asian origin, and 8 of the top 10 nationalities represented are Asian. The breakdown by nationality shows dominance by China, with more than a third of the respondents.

Nationality	2011	2009	*Difference*
China	34%	23%	*+11%*
Korea, South	8%	14%	*-5%*
Japan	8%	7%	*+1%*
Saudi Arabia	8%	13%	*-5%*
Vietnam	4%	9%	*-4%*
Taiwan	4%	4%	*-0%*
Brazil	4%	5%	*-1%*
Thailand	3%	5%	*-1%*
Colombia	3%	4%	*-1%*
Indonesia	2%	1%	*+1%*
Other	21%	16%	*+5%*
Base	8772	10716	*-1944*

Note: Percentages have been rounded to the nearest whole number

There has been a significant increase in the proportion of students from China compared with the 2009 ELB (+11%) and hence relatively most other national groups have decreased in size. It is notable that 79% of the Chinese students are preparing for further study, but only 53% of the total student body. While on the one hand this suggests a more uniform sub-group of Chinese students, the +5% increase in the 'other' category suggests some diversification outside the Chinese sub-group.

Nearly half of respondents (48%) were studying English for Academic Purposes (EAP), while 36% of respondents were studying General English. Much smaller groups (3% or less) were studying for specific purposes, mainly examinations such as IELTS or a Cambridge Exams Preparation course. Over 50% stated their main reason for English language study was preparation for further study, while 33% cited employment-related reasons. The great majority of students were studying full-time in courses of around 24 weeks.

Respondents mainly funded their studies through their family (60%) or their own funds (34%), which is broadly comparable to the situation in 2009 (58% and 31% respectively).

The majority of respondents (87%) held some form of student visa (either ELICOS packaged or Independent ELICOS). The majority of respondents (98%) stated their application was accepted first time; and 86% of respondents were either 'satisfied' or 'very satisfied' with the visa application process. Notwithstanding this generally positive response, 23% considered the process to be 'lengthy and difficult'.

Decision making

Most respondents (83%) had not applied to study in any countries other than Australia. Other countries considered by a minority of students were overwhelmingly English-speaking, including the USA (5%), the UK (4%), Canada (3%) and New Zealand (2%).

The main reasons for respondents choosing to study in Australia remain the same as in 2009: 'it is an English speaking country' (39% in 2011, 41% in 2009) and 'opportunities for further education here after my English studies' (35% in 2011, 33% in 2009). Other factors, each cited by over 20% of respondents, included safety, opportunities for work, and the presence of family or friends, as well as the quality and reputation of the courses offered.

In terms of information sources, the most cited influence when choosing a language school / centre was an education agent / consultant (52%), with 1 in 4 stating 'friends' and 1 in 5 stating 'someone who had previously studied at this language school /centre'. Only 11% of respondents stated they used the school website, 6% used the Study in Australia website and 4% used the English Australia website.

When asked why respondents decided on their current language school, 40% stated 'personal recommendation' emphasising the influence of peers in the decision making process. Other factors that were significant included the school's reputation (31%) and the pathway the course provided to university study (25%). The significance of university pathways in decision-making grew from 21% in 2009 to 25% in 2011 and 12% applied for their course through a university, compared to 7% in 2009.

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Learning

Learning Satisfaction Scores

Satisfaction scores in all 18 learning elements are generally high and they have all improved since 2009 by an average of 5 percentage points. In addition, all of the 2011 ELB satisfaction scores for elements which are comparable against the ISB are equal to or higher than the Australian ISB.

	ELB 2011 vs ELB 2009	Aus ELB 2011	Aus ELB 2009	Aus ISB 2011
OVERALL				
Learning overall	4%	91%	87%	83%
Base	-1453	*7743*	*9196*	*36405*
TEACHERS				
Teachers who I can understand	2%	95%	93%	90%
Staff/teachers who are friendly and approachable	3%	95%	92%	NA
The teaching ability of teachers	3%	94%	91%	85%
Fair and transparent assessment of my work	4%	92%	88%	85%
Getting time from teachers / personal support with learning when I need it	4%	89%	85%	84%
STUDIES				
Feedback on work from teachers	4%	91%	87%	84%
The content of my course/studies	4%	89%	85%	88%
Learning that will help me get onto a good course	5%	89%	84%	NA
Studying with people from other cultures	3%	87%	84%	85%
Extra English language or study skills support classes	6%	82%	76%	NA
The flexibility to decide how I want to study	5%	81%	75%	NA
Work experience opportunities as part of my course	6%	73%	67%	61%
FACILITIES				
The quality of the classrooms	5%	88%	84%	85%
The technology (Computers, internet access etc)	6%	86%	81%	84%
The learning resources (books etc)	5%	86%	81%	86%
Opportunities to practise my English language skills	6%	86%	80%	NA
The size of the classes	6%	85%	79%	NA
Non-classroom activities to help me learn English	7%	76%	69%	NA

The greatest satisfaction (with levels of over 89%) is with all aspects of teaching, feedback, assessment, personal support from teachers and course content. The lowest satisfaction is with flexibility of study, with non-classroom activities to help learn English and opportunities for work experience as part of their course. Nonetheless opportunities for work experience and non-classroom activities to help learn English have increased by 7 percentage points and 6 percentage points respectively since 2009.

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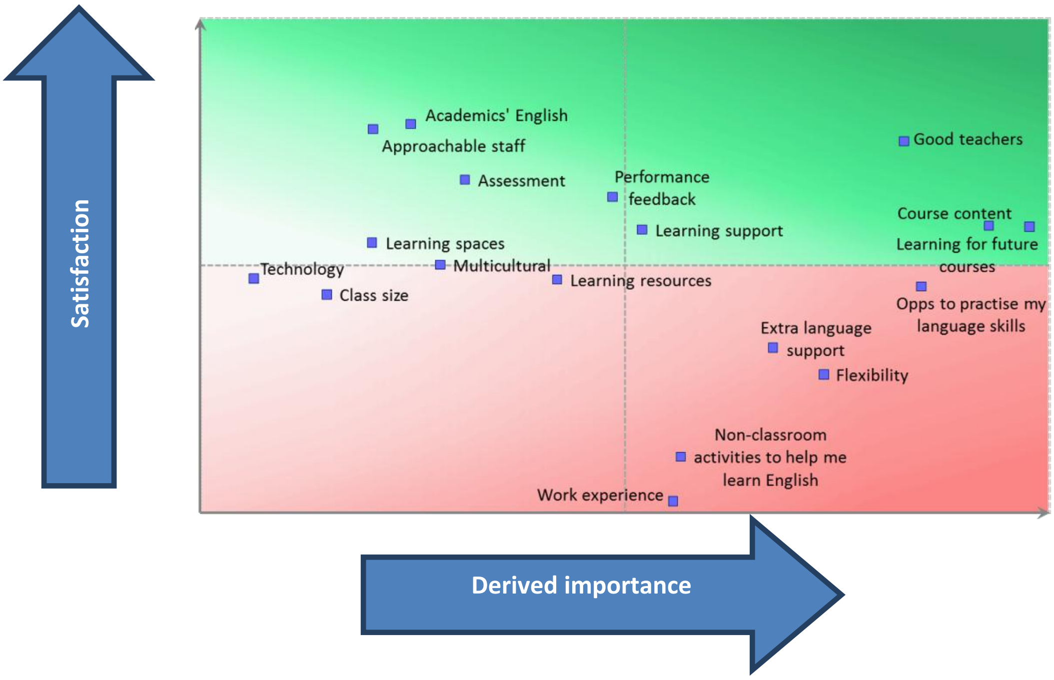
Learning Matrix



The matrix above provides a visualisation of elements based upon students' satisfaction ratings and the derived importance of each element.

Derived importance is calculated by correlating each element of interest with the 'likelihood to recommend'. A higher correlation means that the *relationship* between the element and the likelihood to recommend the experience is strong. Derived importance therefore shows which factors have the greatest impact on recommending the language school to others.

Elements in the top right quadrant are important to students and perform well. This includes 'Course content', 'Learning for future courses' and 'Good teachers'.

Those in the bottom right quadrant are important, but do not perform as well and may be areas for improvement. However, as noted above, many of these have improved markedly since 2009. They include: 'Opportunities to practice my language skills', 'Non-classroom activities to help me learn English' and 'Extra language support'.

Elements in the top and bottom left quadrants are of lower priority and importance to students. These elements should nonetheless be reviewed and monitored to ensure that schools focus on the most important issues for students. Technology and class size are both of relatively low priority for language school students.

Living

Living Satisfaction Scores

Satisfaction scores for all 18 elements of living are moderately high and generally improving. The scores of three measures have decreased since 2009 and one has remained the same.

As with satisfaction scores for learning, there has been an overall improvement since the ELB of 2009 and scores are generally slightly higher than for the ISB. This is a positive scorecard for the ELT sector.

Improved satisfaction is evident in 14 of 18 scores, with the largest improvement recorded in 'Opportunities to earn while studying' (+14%).

The most significant drawback of living in Australia is the high level of dissatisfaction with the cost of living and the cost of accommodation, where only about half the students are satisfied. This picture is marginally worse than in 2009 and is replicated more generally in the ISB. It is exacerbated by the central capital city locations of most language schools and the strength of the Australian dollar.

	ELB 2011 vs ELB 2009	Aus ELB 2011	Aus ELB 2009	Aus ISB 2011
OVERALL				
Living overall	↑ 3%	89%	86%	86%
Base	↓ -1367	*7649*	*9016*	*35412*
ACCOMMODATION and LIVING COSTS				
The quality of accommodation	↑ 2%	83%	80%	84%
Opportunities to earn money while studying	↑ 14%	66%	52%	58%
The cost of accommodation	⇨ 0%	52%	52%	49%
The cost of living (food, drink, transport and social)	↓ -4%	49%	52%	48%
WELCOME				
The welcome I received when I arrived at my language school/centre	↑ 4%	89%	86%	86%
Welcome/pick up at airport/railway/coach station	↑ 1%	83%	82%	77%
SOCIAL				
Making friends from other countries during my stay	↑ 3%	92%	89%	84%
Making friends from my home country during my stay	↑ 2%	90%	88%	89%
Feeling welcome in this country	↑ 3%	87%	84%	NA
Opportunities to experience the culture of this country	↑ 2%	86%	84%	80%
Social activities (events or trips organised by my language school/centre)	↑ 7%	78%	71%	77%
Making friends from this country during my stay	↑ 4%	73%	69%	67%
DAY TO DAY LIFE				
The surroundings outside the language school/centre	↑ 4%	94%	90%	88%
Feeling safe and secure	↑ 7%	87%	80%	86%
Facilities for religious worship	↑ 7%	86%	80%	85%
Availability of internet access	↑ 9%	76%	67%	74%
The weather	↓ -6%	76%	82%	NA
Transport links to other places	↓ -2%	74%	76%	77%

The only three elements which showed decreased satisfaction since 2009 were 'the cost of living' (decreasing by 4 percentage points) and 'transport links to other places' (decreasing by 2 percentage points) and 'the weather' (decreasing by 6 percentage points).

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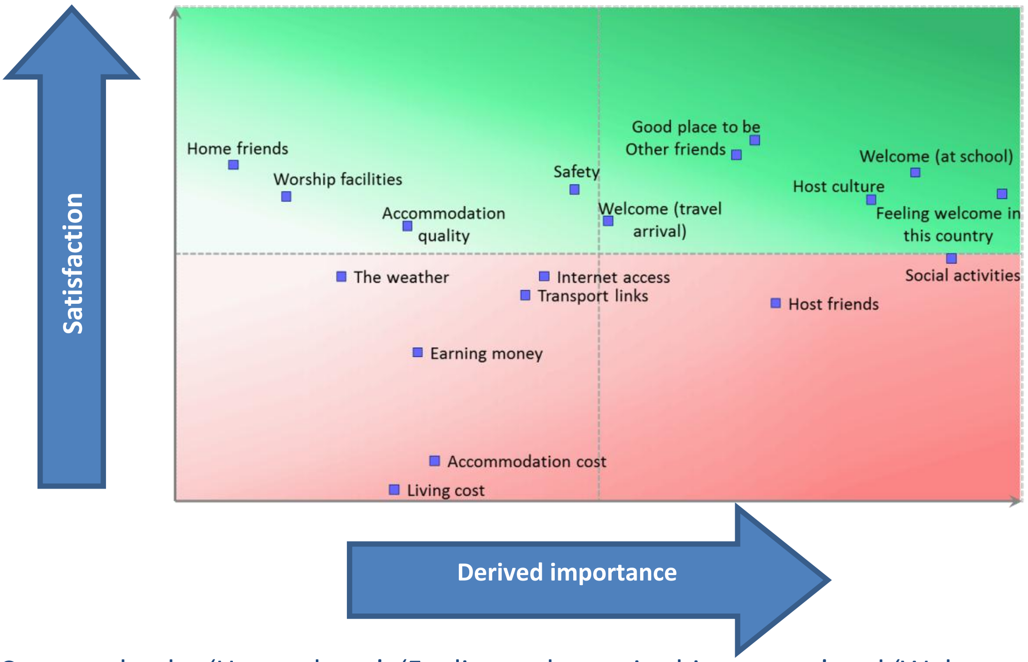
In comparison to the ISB 2011 satisfaction Is higher in 16 out of the 18 elements, with the 2011 Language Barometer results 4 percentage points lower for 'transport links to other places' and 1 percentage points lower for 'quality of accommodation'.

Living Matrix

'Host friends' and 'social activities' are identified as areas of high importance but only about 3 in 4 students are satisfied with these aspects. These two elements have both improved since 2009, but there may still be further scope for improvement.



Conversely, the 'Host culture', 'Feeling welcome in this country' and 'Welcome at the school' were all rated as areas of high importance and the vast majority of students were satisfied with these aspects of their student experience.

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Support

Support Satisfaction Scores

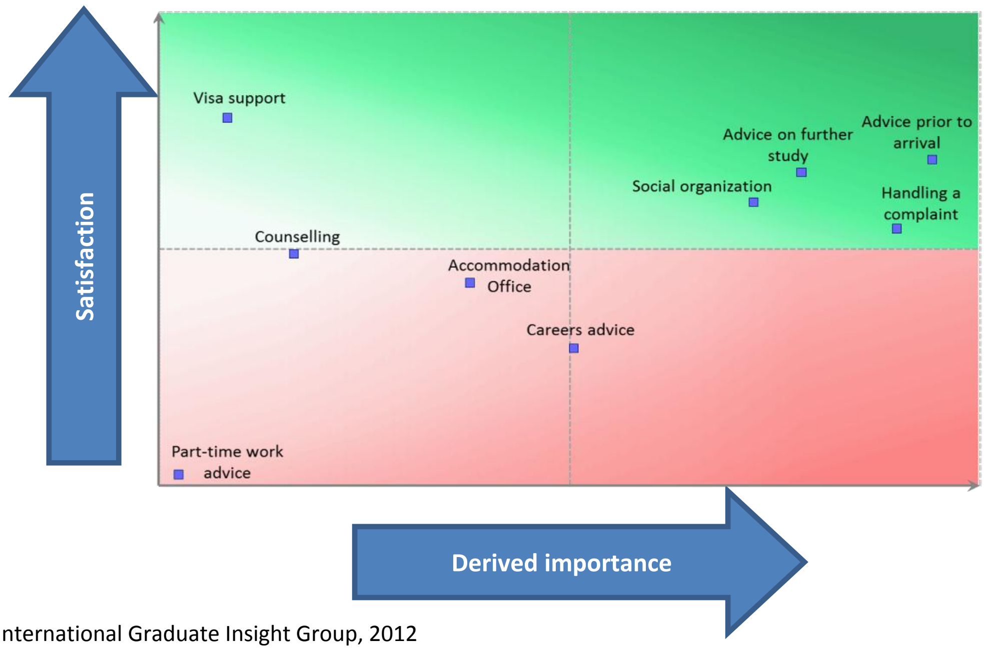
Support services are benchmarked only against the 2009 ELB, as many support services are dissimilar at University level. As with learning and living, the satisfaction levels are general high and all elements show marked improvement since 2009 (+7% overall).

	ELB 2011 vs ELB 2009	Aus ELB 2011	Aus ELB 2009
OVERALL			
Support overall	7%	83%	76%
Base	-1286	*7530*	*8816*
STUDY and EMPLOYMENT			
Advice on further study following my English course	7%	85%	78%
Advice on employment/career options following my course	7%	75%	67%
Advice and guidance on finding part-time work while in this country	9%	68%	59%
LIVING			
Social organization	10%	83%	73%
Advice on finding medical care or counselling services	7%	80%	73%
Accommodation placement service	7%	79%	72%
OTHER			
Help and support with my visa application	3%	88%	84%
Advice provided by my language school/centre before travelling	6%	85%	80%
Handling a complaint	10%	82%	72%

The highest satisfaction is with help and support with visa applications (88%) and advice on further study (85%). Conversely, satisfaction was lowest with advice in relation to part-time work (68%), which may be related to unrealistic expectations of the economic situation and the role of the school.

Support Matrix

The Support Matrix shows a very positive picture as the majority of elements are within the upper quadrants for satisfaction. Satisfaction with support relating to jobs ('Part-time work advice' and 'Careers advice') has improved markedly since 2009: these could be seen as areas for further improvement or areas for expectation management.



Recommendation

Respondents were asked: *"Would you recommend your **English language school/centre** to other students thinking of applying for a similar course?"* The table below shows a summary of the response:

Aus ELB 2011 (7609)	2011 vs. 2009		Aus ISB 2011 (34550)
28%	+2%	I would actively encourage people to apply	25%
50%	+4%	If asked, I would encourage people to apply	49%
18%	-4%	I would neither encourage nor discourage people to apply	19%
3%	-1%	If asked, I would discourage people from applying	5%
1%	-1%	I would actively discourage people from applying	2%

The results are very positive, with 78% saying they would encourage others to apply, and only 4% who would discourage others. As with other scores, these show an improvement since 2009 and are marginally better than the ISB scores.

Respondents were also asked: *"Would you recommend **this country** to other students thinking of applying for a similar course?"* The results in the table below show a net increase in encouragement compared to 2009, i.e. more who would positively encourage others AND fewer who would discourage others.

Aus ELB 2011 (7610)	2011 vs 2009	
37%	+3%	I would actively encourage people to apply
45%	+1%	If asked, I would encourage people to apply
15%	-3%	I would neither encourage nor discourage people to apply
3%	+1%	If asked, I would discourage people from applying
1%	-2%	I would actively discourage people from applying

82% would encourage others to apply to the country and this is 4 percentage points higher than the recommendation score for the language school/centre. This difference, although small, may suggest that the strength of the country's reputation for quality enhances the reputation of the individual school.

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Summary

The 2011 ELB is a major survey of almost 9000 students with an excellent response rate of 66%. The results from the 2011 ELB are overwhelmingly positive and show high levels of satisfaction on almost all aspects of their experience, from visa application, through learning and living to student support. Furthermore the 2011 results show significant improvement from a similar survey undertaken in 2009. The Language School sector performs well in comparison with the international student response from the university sector in Australia on almost all indicators.

The profile of this cohort of students is slightly different from 2009, with a large and distinct cohort of Chinese students predominantly undertaking English language study as a pathway to further tertiary education. Most students are from Asia and are studying full-time English to assist with further study or current and future employment.

The main areas of strength include:

- High satisfaction with visa processing and visa support from the language schools
- Very high satisfaction with all aspects of learning, teaching and assessment
- Very high satisfaction with their welcome, social and cultural events
- High satisfaction with student support
- High levels of recommendation of their school to others
- Even higher levels of recommendation of Australia as a whole as a study destination

There are few areas for improvement, and the most notable of these is the cost of living and the cost of accommodation, which are issues essentially external to the language schools and out of their control. These factors include the strength of the Australian dollar and the central capital city locations of many language schools.

Students are interested in part-time work to offset these costs but are relatively dissatisfied with its availability and the help they receive in finding work. Notably, however, satisfaction with these indicators has improved considerably since 2009. Given the difficulties of the economic environment and of obtaining employment with limited English, it may be that these are areas for management of student expectations rather than for further improvement by the language schools themselves.

Other areas of lower satisfaction include host friends and social activities. While there has been strong improvement in these since 2009, these may still be areas for further work by language schools.

The most positive aspects of this report are the very high levels of student satisfaction with teaching, learning and courses, and the fact that areas of lowest satisfaction are factors of the external environment.

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Appendices

Appendix A– 2011 ELB Australia participants

Ability English Melbourne	Navitas English Cairns
Ability English Sydney	Navitas English Darwin
Academy of English	Navitas English Manly
ACU English Language Centre Melbourne	Navitas English Perth
ACU English Language Centre Sydney	Navitas English Sydney
Bond University English Language Institute	Open Access College, University of Southern Queensland
Centre for English Language University of South Australia (CELUSA)	QUT International College
Curtin English Language Centre	RMIT English Worldwide
Deakin University English Language Institute (DUELI)	Swinburne College
Embassy CES Brisbane	TAFE English Language Centre Northern Sydney Institute
Embassy CES Melbourne	TAFE International Education Centre
Embassy CES Sydney Centre	TAFE NSW Sydney Institute English Centre (SITEC)
English Language Company	TAFE SA English Language Centre
English Language Institute Victoria University Melbourne Australia	The Centre for Macquarie English (CME)
ETI	The University of Newcastle Language Centre
Eynesbury College Academy of English	The University of Sydney Centre for English Teaching
Griffith English Language Institute (GELI)	UNE English Language Centre
Hawthorn-Melbourne	University of Adelaide English Language Centre
ILSC Brisbane	University of Canberra English Language Institute (UCELI)
ILSC Sydney	University of Tasmania (UTAS)
Institute of Continuing & TESOL Education, The University of Queensland (ICTE-UQ)	UNSW Institute of Languages
Intensive English Language Institute (IELI)	UTS:INSEARCH
Monash University English Language Centre	UWA Centre for English Language Teaching
Navitas English Bondi	UWSCollege
Navitas English Brisbane	

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Appendix B – 2009 ELB Australia participants

Academy of English	Mackay Language College
ACL Darwin English Centre	Pacific Gateway International College Brisbane
ACL Sydney English Centre	Pacific Gateway International College Sydney
ANU College	Perth Institute of Business and Technology (PIBT)
Australian College of English - Bondi Junction	RMIT English Worldwide
Australian College of English - Brisbane	Russo English Australia
Australian College of English - Cairns	Shafston International College
Australian College of English - City	Southbank Institute of Technology
Australian College of English - Manly	Swinburne University ELC
Australian College of English - Perth	Sydney Institute of TAFE English Centre (SITEC)
Australian Pacific College	TAFE English Language Centre Northern Sydney
Bond University English Language Institute	TAFE International Education Centre, Liverpool
CELUSA	TAFE SA English Language Centre
Centre for English Teaching, The University of Sydney	Taylors English Language Preparation Program Waterloo
Curtin English Language Centre	The Centre for Macquarie English
Deakin University English Language Institute	The University of Newcastle Language Centre
Embassy CES Brisbane & Gold Coast Campuses	Think Colleges Pty Ltd
Embassy CES Darlinghurst Campus	UNE English Language Centre
Embassy CES Melbourne Campus	Universal Education Centre Pty Ltd
Embassy CES Perth Campus	University of Adelaide, English Language Centre
English Language Institute Victoria University	University of Canberra English Language Institute
Eurocentres Perth	University of Southern Queensland
Griffith English Language Institute	University of Tasmania, English Language Centre
Hawthorn English Language Centre	UNSW Institute of Languages
Insearch	UWA Centre for English Language Teaching
Institute of Continuing & TESOL Education (ICTE-UQ)	UWS College
Intensive English Language Institute	Viva College
Intercultural Education Today (ICET) Pty Ltd	Wollongong College Australia
La Trobe University International College	

Appendix C – Short and Long terminology

Learning

Terminology as used in the survey	Short version
The teaching ability of teachers	Good teachers
Teachers who I can understand	Academics' English
Getting time from teachers / personal support with learning when I need it	Learning support
Extra English language or study skills support classes	Extra language support
Staff/teachers who are friendly and approachable	approachable staff
Fair and transparent assessment of my work	Assessment
The content of my course/studies	Course content
Opportunities to practise my English language skills	Opps to practise my language skills
Feedback on work from teachers	Performance feedback
The flexibility to decide how I want to study	Flexibility
Studying with people from other cultures	Multicultural
Work experience opportunities as part of my course	Work experience
Non-classroom activities to help me learn English	Non-classroom activities to help me learn English
Learning that will help me get onto a good course	Learning for future courses
The quality of the classrooms	Learning spaces
The learning resources (books etc)	Learning resources
The technology (Computers, internet access etc)	Technology
The size of the classes	Class size

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Living:

Terminology as used in the survey	Short version
Welcome/pick up at airport/railway/coach station	Welcome (travel arrival)
The welcome I received when I arrived at my language school/centre	Welcome (at school)
The quality of accommodation	Accommodation quality
The cost of accommodation	Accommodation cost
The cost of living (food, drink, transport and social)	Living cost
Opportunities to earn money while studying	Earning money
Social activities (events or trips organised by my language school/centre)	Social activities
Feeling welcome in this country	Feeling welcome in this country
Making friends from my home country during my stay	Home friends
Making friends from other countries during my stay	Other friends
Making friends from this country during my stay	Host friends
Opportunities to experience the culture of this country	Host culture
Availability of internet access	Internet access
Facilities for religious worship	Worship facilities
Feeling safe and secure	Safety
The surroundings outside the language school/centre	Good place to be
The weather	The weather
Transport links to other places	Transport links

Terminology as used in the survey	Short version
Support:	
Advice and guidance on finding part-time work while in this country	Part-time work advice
Advice on employment/career options following my course	Careers advice
Accommodation placement service	Accommodation Office
Advice on finding medical care or counselling services	Counselling
Handling a complaint	Handling a complaint
Social organization	Social organization
Advice on further study following my English course	Advice on further study
Advice provided by my language school/centre before travelling	Advice prior to arrival
Help and support with my visa application	Visa support

Position Statement
ELICOS Sector Regulation

QUALITY | SUPPORT | ASSURANCE

Background

English Language Intensive Courses for Overseas Students (ELICOS) provision takes place across a range of different provider types including stand-alone ELICOS only providers as well as those that also deliver school, vocational and higher education courses.

Until 1 July 2011 there were two layers of regulation applicable to ELICOS providers:

a) ELICOS specific accreditation of providers and non-award courses (compliance with NEAS Standards);
b) registration of providers and courses on CRICOS (compliance with the ESOS Act / National Code).

Until 1 July 2011 ELICOS specific accreditation was predominantly provided by the National ELT Accreditation Scheme (NEAS), with some ELT provision also being delivered by RTOs within the VET regulation framework through award courses.

Until 1 July 2011 CRICOS registration was provided by state/territory authorities under delegation from DEEWR according to the provisions of the ESOS legislation.

The NEAS Standards were developed prior to the ESOS Act / National Code, resulting in a significant duplication of focus. New National Standards for ELICOS providers and courses that removed all areas of duplication were developed by the Australian Government and state and territory governments in consultation with the ELICOS sector and in July 2011 these new standards were made legislative instruments under ESOS.

Legislation was also amended to provide that the Australian Skills Quality Authority (ASQA) would be the designated authority under the ESOS Act for ELICOS providers (with a gradual transition depending on changes to state legislation). The state regulatory authorities continue to be the designated authority for ELICOS providers in Queensland until further state legislation is passed later in the year.

The Tertiary Education Quality and Standards Agency (TEQSA) was established in January 2012, and it is proposed that it will be the designated authority for ELICOS providers operating in the higher education sector.

Processes and costs under ASQA and TEQSA specific to ELICOS provision are as yet unclear.

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English Australia Position – key points

English Australia believes that the ELICOS sector plays a critical role within the international education export industry as well as the tourism industry.

The ELICOS sector is 100% export focused and international students need to have the confidence that wherever they study ELICOS, the standards of provision will meet their expectations.

English Australia believes that for the ELICOS sector to remain **internationally competitive** and **successful**, it needs a regulatory framework that has the following features:

- consistent national approach;
- a regular and rigorous auditing regime;
- demonstrated expertise and experience in ELICOS;
- ELICOS sector specific information, procedures and communication strategies;
- streamlined and responsive processes
- strategic engagement with the sector;
- cost framework that ensures the sector remains competitive;
- protection of industry's global reputation by being internationally competitive on quality measures.

Taking into account the varying provider types, English Australia believes the following allocation of responsibility for compliance monitoring is the preferred model to deliver the desired outcomes.

Provider "type"	*ELICOS Standards compliance*	*ESOS/National Code compliance*
stand-alone	*NEAS*	*NEAS*
RTO (inc. TAFE)	*NEAS*	*ASQA*
higher education	*NEAS*	*TEQSA*

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