

18 May 2018

Mr Jason Wood MP
Chair
Joint Standing Committee on Migration
Parliament House
CANBERRA ACT 4600

Dear Mr Wood

EFFICACY OF CURRENT REGULATION OF AUSTRALIAN MIGRATION AGENTS

I write regarding the Joint Standing Committee on Migration's inquiry into and reporting on the efficacy of current regulation of Australian migration agents which is being undertaken on the request of the Hon Alex Hawke MP, Assistant Minister for Home Affairs.

On behalf of Charles Sturt University, I am pleased to respond to the Joint Standing Committee on Migration's inquiry into and reporting on the efficacy of current regulation of Australian migration agents call for submissions.

Charles Sturt University is Australia's largest regional university, with more than 43,000 students and approximately 2,100 FTE staff. Established in 1989, the University traces its origins to the formation of the Bathurst Experimental Farm and Wagga Wagga Experimental Farm in the 1890s. In one form or another, research, innovation and education has been integral to the University's character and mission for more than a century.

Charles Sturt University is a unique multi-campus university with campuses at Albury-Wodonga, Bathurst, Canberra, Dubbo, Goulburn, Manly, Orange, Parramatta, Port Macquarie and Wagga Wagga, as well as various study centres located throughout regional and rural south-eastern Australia.

The University's commitment to the development and sustainability of rural and regional Australia is informed by the unique research focus undertaken, and the partnerships it has formed with each of our campus local communities, local industry, and with the broader regions it serves.

Further, we provide substantial direct economic benefit to the regional cities in which the University operates through our enrolment load of more than 7,000 students. Charles Sturt University is registered on the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) (see, <http://cricos.education.gov.au>) as a provider of higher education to international student visa holders under the *Education Services for Overseas Students Act 2000* (ESOS Act) (see, <https://www.legislation.gov.au/Series/C2004A00757>) and must comply with the *National Code of Practice for Providers of Education and Training to Overseas Students 2017* (see, <https://internationaleducation.gov.au/Regulatory-Information/Education-Services-for-Overseas-Students-ESOS-Legislative-Framework/National-Code/Pages/default.aspx>) as regulated by the Tertiary Education Quality Standards Agency (TEQSA) (see, <https://www.teqsa.gov.au/cricos-registration>).

Charles Sturt University is pleased to provide a submission to the Committee's inquiry. We have prepared our submission based on the terms of reference for the inquiry and the principles underpinning the conduct of the inquiry provided at

https://www.aph.gov.au/Parliamentary_Business/Committees/Joint/Migration/Migrationagentregulation. In

addition, we are keen to participate in the Committee's ways to gather evidence from individuals and organisations, including:

- public hearings to gather evidence from stakeholders, including government agencies, non-government organisations, and experts in the policy area;
- the Committee's questionnaire that enables organisations who have engaged the services of a migration agent or education agent to make a contribution to the inquiry, at <https://www.surveymonkey.com/r/migrationclientsurvey>; and,
- our written submission addressing the terms of reference provided below.

Registration and regulation of migration and education agents in Australia - education, English proficiency, payment, fee-scheduling as well as the suitability and stringency of the accreditation process, evidence of deficiencies etc.

With reference to international marketing, Charles Sturt University believes that current arrangements concerning the registration and regulation of migration and education agents in Australia, including capabilities in immigration skills and knowledge, English proficiency, payments, fee-scheduling as well as the suitability and stringency of the accreditation process, evidence of deficiencies etc. are adequate.

Further, at Charles Sturt University we have developed and implemented a comprehensive risk management and quality assurance agent management system which includes our own screening, assessment and appointment processes do not unveil major deficiencies in this space.

The nature and prevalence of fraud, professional misconduct and other breaches by registered migration agents and education agents, the current review mechanisms for migration agents and the adequacy of penalties.

Charles Sturt University has experienced very few occurrences of suspected professional misconduct for our regional campus agents, with reviews of these occurrences, in the context of the risk management and quality assurance agent management system mentioned above have revealed no evidence of agent fraud. The University has not discontinued a single agent for misconduct. Instances of suboptimal outputs are usually linked to international student submitting application for admission that supply false or misleading information within their application or dissatisfaction with their agent and fall into our misconduct and complaints process.

Charles Sturt University, is however, of the view that there is a lack of penalty to education agents for fraud or misconduct other than the CRICOS Provider employing their own risk management and quality assurance practices and taking a management decision to no longer work with an agent and discontinuing contractual relationship. CRICOS Providers have no visibility of agent misconduct across the sector.

The function of a real time listing of reported agents within Provider Registration and International Student Management System (PRISMS) (see, <https://prisms.education.gov.au/Logon/Logon.aspx>) or the Department of Home Affairs website would be beneficial. This would allow CRICOS Providers to share issues of misconduct thereby allowing enabling other Providers to be aware and make a decision on whether to recruit an agent or to increase monitoring of the agent performance. The reporting would need to include the agent details, office location, and the nature of misconduct, for example, course, fraudulent documents or non-Genuine Temporary Entrants (GTE) (see, <https://www.homeaffairs.gov.au/Trav/Stud/More/Genuine-Temporary-Entrant>), misleading marketing etc.

Deficiencies and barriers to relevant authorities' investigation of fraudulent behaviour by registered migration agents and education agents in visa applications, including the adequacy of information and evidence sharing between such authorities.

With reference to deficiencies and barriers to relevant authorities' investigation of fraudulent behaviour by registered migration agents and education agents in visa applications, including the adequacy of information and evidence sharing between such authorities please refer to our commentary above.

Further on this matter, Charles Sturt University is of the view that CRICOS Providers have limited influence over the GTE assessment in that CRICOS Providers are not skilled migration agents or education agents, and neither are they skilled Department of Home Affairs student visa assessors.

CRICOS Providers, while having the guidelines set by Ministerial Directive 69, do not often have real time in country information and are reliant on in country agents for such information. CRICOS Providers assess GTE based on Ministerial Directive 69 however do not have the advantage of DHA GTE assessment training and tools. Yet CRICOS Providers bear the risk of student visa refusal.

It would be extremely beneficial to CRICOS Providers to have access to current and ongoing GTE training by the Department that would enable Universities to use the same or similar processes and tools, excluding access to personal visa history and other relevant privacy matters. Such process and tools would then be implemented in accordance with each CRICOS Provider's risk management and quality assurance system for management of international students and agent dealings. Furthermore, it would reduce student visa applications from non-GTE applicants as these could be filtered more effectively at the CRICOS Provider level.

Evidence of the volumes and patterns of unregistered migration agents and education agents providing unlawful immigration services in Australia.

As a CRICOS Provider, Charles Sturt University is aware that PRISMS is currently being strengthened as a result of a number of past reviews and that PRISMS will provide new, additional agent reporting functions later in 2018 to better report agent performance for CRICOS Providers.

We also, understand that a second phase of agent reporting across the sector will follow these improvements. Charles Sturt University believes that these are positive system design development and provide a tangible step towards wider visibility of agent performance.

We also note that these improvements provide greater alignment with the New Zealand immigration approach for international student visa applicants and holders. The result of this reporting in New Zealand has however seen high performing agents request increased commission. This would need to be carefully considered and monitored so to not create market discrimination.

Reviewing the appropriateness of migration and education agents providing other services to clients.

Charles Sturt University is of the view that the migration agent and education agent regulatory systems would be strengthened for CRICOS Providers is they were to receive advice from the Department of Home Affairs of any education agents identified for any misconduct relating to non-education services. And, again as mentioned above, the ideal mechanism for this information services would be way of system improvement of PRISMS.

Integrity issues associated with the Electronic Travel Authority (subclass 601) visa.

Students and staff recruited from offshore by Charles Sturt University do not use the Electronic Travel Authority (subclass 601 Visa, see <https://www.homeaffairs.gov.au/Trav/Visa-1/601->. Consequently, Charles Sturt University provides no commentary nor recommendations to the Committee's inquiry on this matter.

Evidence of visa cancellation rates, non-compliance with 'no work' conditions, and other integrity concerns.

The Simplified Student Visa Framework (SSVF) (see, <https://www.homeaffairs.gov.au/Busi/Educ/simplified-student-visa>) penalises CRICOS Providers through their Risk Index (RI) (see, <https://www.homeaffairs.gov.au/Busi/Educ/managing-immigration-risk>) for attrition issues which includes students who cease study or are non-compliant with student visa conditions. While CRICOS Providers are responsible for student support and providing advice to students when they are at risk, CRICOS Providers cannot control the actions of students off campus or for that matter changes in personal circumstances that were unforeseeable at the time of study and visa application.

While these issues should be reportable by CRICOS Providers for awareness and to address, it should not be included in the RI as it is not a controllable measure by CRICOS Providers. For example, if the student passed the Charles Sturt University's GTE assessment and subsequently the Department of Home Affairs assessment to obtain a student visa, why should the, the University, as a CRICOS Providers be held accountable for issues beyond our control, or for that matter beyond the ability of the Department to know or control at the point of application and approval?

On 15 September 2017 I wrote to the Secretary of the Department of Immigration and Border Protection, Mr Michael Pezzullo, regarding the Department's review of possible reforms to modernise Australia's visa system.

Charles Sturt University's interest in reform and modernisation of Australia's visa arrangements is system-wide, however the focus of our submission to the Department of Immigration and Border Protection's review of possible reforms to modernise Australia's visa system centred around the international student visa element of the broader visa system.

In our submission to the Department, I highlighted that the University has a keen interest in ensuring a world-class and internationally competitive visa system for Australia that continues to aid regional development through permanent attraction and retention of skilled migrants to regional Australia, the ability for mega-projects to upscale and downscale their workforces using foreign labour where skilled shortages exists on a temporary basis, the continued successful integration of humanitarian refugees in regional communities and the unimpeded free-flow of foreign academics and national with advanced STEM qualifications.

I have included a copy of our submission to the Department of Immigration and Border Protection's review of possible reforms to modernise Australia's visa system for the Committee's reference.

In conclusion, this submission to the Committee's inquiry provides a range of recommendations relating to Australia's migration and education agent arrangements. We believe that our recommendations would strengthen Australia's migration and education agent system, particularly with regards Australia's global competitiveness in the international student market, as well as the wider benefits touched on above.

I would be delighted to provide further information to the Committee as well as the Assistant Minister and would be available to provide evidence at any proposed hearings that the Committee may undertake in relation to Australia's migration and education agent arrangements.

Yours sincerely



Professor Andrew Vann
Vice-Chancellor

CHARLES STURT UNIVERSITY

Submission

Australian Government

Reforms to Modernise Australia's Visa System

Department of Immigration and Border
Protection

15 September 2017

Table of Contents

Letter from the Vice-Chancellor.....	3
Terms of Reference	7
1. Recommendations	8
2. Consultation Framework	14
3. Charles Sturt University	15
4. Submission to Inquiry.....	17
5. Conclusion.....	45
Appendix I – Reference List	48
Appendix II – National International Education Strategy 2025	
Appendix III – Australian International Education Roadmap 2025	
Appendix IV – Charles Sturt University – Submission – Inquiry into Regional Development and Decentralisation – Select Committee for Regional Development and Decentralisation, House of Representatives, Parliament of Australia	

15 September 2017

Mr Michael Pezzullo
Secretary
Department of Immigration and Border Protection
6 Chan Street
BELCONNEN ACT 2617

Dear Mr Pezzullo

REFORMS TO MODERNISE AUSTRALIA'S VISA SYSTEM

On behalf of Charles Sturt University, I am pleased to provide this submission to the Department of Immigration and Border Protection on the Australian Government's reforms to modernise Australia's visa system.

Charles Sturt University's interest in reform and modernisation of Australia's visa arrangements is system-wide, however the focus of our input to University Australia's submission centres around the international student visa element of the broader visa system.

We do, however have a keen interest in ensuring a world-class and internationally competitive visa system for Australia that continues to aid regional development through permanent attraction and retention of skilled migrants to regional Australia, the ability for mega-projects to upscale and downscale their workforces using foreign labour where skilled shortages exists on a temporary basis, the continued successful integration of humanitarian refugees in regional communities and the unimpeded free-flow of foreign academics and national with advanced STEM qualifications.

With regards the international student visa element of the broader visa system, Charles Sturt University provides the following input to Universities Australia's submission to the Department's review process.

1. As of 2016, Charles Sturt University had a total of 6,800 international students studying on Australian international student visas. While we are currently working through the direct and flow-on economic impact of the presence of our international student load in each of the regional cities in which we operate, we can confirm that the economic and social impact of their presence is strongly positive for the communities in which we operate.
2. Our current international student load, represents double-digit growth over the five years since 2012 which is consistent with Australia's growth and success in the international student market.
3. International student market, Charles Sturt University's perspective:

- a) Attracting international students to Australia is very competitive, and Australia must compete to attract the best and brightest students. Any changes to Australia's visa system should be communicated well in advance of taking effect so that University marketing and promotional activities have time to communicate this to prospective future students.
- b) What factors should we consider when simplifying the visa system?
 - Ensure that any changes to consider and evaluate student visas do not increase process times if there is a single student visa. Many students will apply to a range of universities in many countries, accepting their first offer. Charles Sturt would encourage a process which seeks to ensure time frames are reduced, or at least maintained, and recognises the differences across the visa class.
 - Ensure that the application fee does not increase significantly from the current \$560. To do so reduces Australia's competitiveness in a global market, where many of our competitors have less expensive application fees.
- c) What should be the key characteristics of a simplified and flexible visa system?
 - Simplifying the application process with clear, standardised and objective criterion while remaining cognisant of the differences between the types of students, for example, a research student and a secondary student (grouping these types of students together may cause processing delays).
- d) Temporary visas are for specific, short-term activities only:
 - Post Study Work Rights: Charles Sturt University has a strong history of producing graduates who achieve success in their chosen industries with a current graduate employment rate that is above the national average. The Temporary Graduate visa (subclass 485) is an important and attractive feature of the existing visa system. It enables Charles Sturt graduates to implement their studies in the environment in which they were taught, consolidating their studies in a professional context. If a clear delineation between visa types is adopted, Charles Sturt would advocate clarity around benefits associated with the existing study visas.
 - Charles Sturt University is a regional university and supports the communities in which we operate. This includes investing in students who can support regional communities after graduation. Charles Sturt would support a framework in post-study work rights are lengthened should employment in regional areas be prioritised by the applicants who find employment in regional areas of Australia. Please also refer our general commentary provided in paragraph three of this letter above.

- Charles Sturt University also supports immediate implementation of the masters and doctorate by research visa system, set out in the National Innovation and Science Agenda (NISA) launched by the Commonwealth Government in November 2015, that provides a direct path to residency with a guarantee of permanent residency on graduation from a research postgraduate qualification at the AQF 9 and 10 level. Implementation of this visa reform would be a game-changer for Australia's international student market attractiveness, the future global competitiveness of Australian industry and in particular, for development of regional Australia and decentralisation of our metropolitan cities in the 21st Century digital age.
4. Other questions put forward in the Department's consultation and market papers:
- a) What requirements should underpin a migrant's eligibility for permanent residence? Should prospective migrants spend a period of time in Australia before becoming eligible for permanent residence? What factors should be considered?
- Should we advocate that time spent studying in Australia be included in any required time-period to apply for permanent residency visas? This would ensure that Australian international education remains in a genuinely competitive proposition against the likes of Canada, New Zealand and the UK, as well as countries like Germany, Japan and China whose universities are increasingly delivering undergraduate tuition in English and the recent and quite radical migration reforms in Japan. More market research and analysis will be required to answer these questions, both by Universities Australia and Charles Sturt University for our own submission to the Department's visa reform and modernisation process.
 - Should we consider whether spending time in regional Australia would be viewed with favour when applying for permanent visas? Do we continue and expand that current five bonus point arrangements for residency with regards regional Australia?
 - Should we introduce a regional student visa subclass, for study and residence in regional Australia? Such a visa class would provide a major impetus to the Commonwealth regional development agenda (Regions 2030 Unlocking Opportunity statement), the Government's review of regional development and decentralisation, as well as decentralisation initiatives and several of the major elements of the Our Future Our North White Paper on Development of Northern Australia and policies focuses on Tasmanian economic growth and development.

Our submission to the Department's review process will provide a range of recommendations relating to Australia's visa system and detailed in the Department's policy consultation and market consultation papers that detail the scope of the Government's proposed immigration reforms.



We believe that our recommendations would strengthen Australia's visa system, particularly with regards Australia's global competitiveness in the international student market, as well as the wider benefits touched on throughout this submission.

I would be delighted to provide further information to the Minister for Immigration and Border Protection, as well as the Department and would be available to provide evidence at any proposed hearings that the Government may undertake in relation to considering the merits of modernising Australia's visa system.

Yours sincerely



Professor Andrew Vann
Vice-Chancellor

Terms of Reference

Refer Section 2 Introduction for the Terms of Reference of the Australian Government's Reforms to Modernise Australia's Visa System.

1. Recommendations

Charles Sturt University recommends the following reforms to modernise Australia's visa system:

1.1 Policy Consultation Paper - Visa Simplification: Transforming Australia's Visa System

- (1) Scope for reduction in the number of visas from 99 at present, to approximately ten visas

Charles Sturt University recommends that:

- all changes to the visa system are announced with adequate time to prepare and educate the market with clarity around the policy settings of changes to the visa system;
- changes to the visa system reduce processing times and ensure consistency in outcomes;
- any changes to the visa system are made with recognition to the differing characteristics of applicants in Australia's diverse education system;
- the retention of a class of visa that support post study work opportunities for graduates of Australian universities; and,
- that the government should maintain short term visa pathways (such as the current 600, 601, 651 and 400) that allow for overseas academics and specialists to enter Australia for short periods of time to undertake highly specialised activities and attend academic meetings.

- (2) Delineation between temporary entry and long-term or permanent residence

Charles Sturt University recommends the retention of a class of visa that support post study work opportunities for graduates of Australian universities.

- (3) Role a period of provisional residence could play in enhancing the integrity of the visa system and easing the burden on taxpayers

Charles Sturt University recommends:

- retention of a class of visa that support post study work opportunities for graduates of Australian universities;
- recognising time spent studying in Australia as part of any time threshold in considering eligibility for permanent residency; and,

- a period of provisional residence could indeed assist the enhancement of the integrity of the visa system by securing our investment and retaining our best people. This could be achieved by individuals remaining with their sponsoring institution or their nominated occupation for a defined period. However, the implementation of provisional residence as the only pathway for permanent residency could also be a hindrance for our sector and a flexible approach is necessary in order to:
 - not limit the ability of academics to apply for competitive Category 1 funding;
 - provide settlement opportunities (for example, ability to secure mortgages); and,
 - ensure the reduction in exposure to additional costs of living, such as:
 - state-based fees for public schooling; and
 - health care costs.

(4) Ensuring that our visa system supports Australia as a competitive and attractive destination for temporary and longer-term entrants

Charles Sturt University recommends:

- that all changes to the visa system are announced with adequate time to prepare and educate the market with clarity around the policy settings of changes to the visa system;
- that changes to the visa system reduce processing times and ensure consistency in outcomes;
- that the financial support threshold or application fees are not increased against key competitor markets;
- the retention of a class of visa that support post study work opportunities for graduates of Australian Universities;
- no change to existing framework for dependents and other family members extended to student visa holders; and,
- consideration of increases to - the number of student visas for students who elect to study in a non-metropolitan location.

(5) Simplifying our visa arrangements

(a) What would a system with approximately 10 visas look like?

Charles Sturt University recommends that:

- any changes to the visa system are made with recognition to the differing characteristics of applicants in Australia's diverse education system;
- all changes to the visa system are announced with adequate time to prepare and educate the market with clarity around the policy settings of changes to the visa system;
- changes to the visa system reduce processing times and ensure consistency in outcomes; and,
- the financial support threshold or application fees are not increased against key competitor markets.

(6) What factors should we consider when simplifying the visa system?

Charles Sturt University recommends that:

- assessing visa applications are supported by clear, standardised and objective criteria,
- consideration be given to administrative processes that increase efficiencies delivering savings in time processing and consistency of outcomes,
- all changes to the visa system are announced with adequate time to prepare and educate the market with clarity around the policy settings of changes to the visa system; and,
- the financial support threshold or application fees are not increased against key competitor markets.

Charles Sturt University also refers the Department, to the University's recent submission to the Inquiry into Regional Development and Decentralisation which is currently being undertaken by the Select Committee of Regional Development and Decentralisation of the House of Representatives of the Australian Parliament, which contains a range of recommendations regarding international students studying in regional Australia.

(7) What should be the key characteristics of a simplified and flexible visa system?

Charles Sturt University recommends that:

- assessing visa applications are supported by clear, standardised and objective criteria; and,
- consideration be given to administrative processes that increase efficiencies delivering savings in time processing and consistency of outcomes.

(8) Temporary and permanent residence

(a) What distinctions should apply to temporary and permanent visas?

Charles Sturt University recommends:

- the retention of a class of visa that support post study work opportunities for graduates of Australian universities;
- considering increasing the number of student visas for students who elect to study in a non-metropolitan location;
- recognising time spent studying in Australia as part of any time threshold in considering eligibility for permanent residency; and,
- recognising time spent studying in regional Australia as part of any time threshold in considering eligibility for permanent residency.

(b) What requirements should underpin a migrant's eligibility for permanent residence?

Charles Sturt University recommends:

- recognising time spent studying in Australia as part of any time threshold in considering eligibility for permanent residency; and,
- recognising time spent studying in regional Australia as part of any time threshold in considering eligibility for permanent residency.

(c) Should a prospective migrant spend a period of time in Australia before becoming eligible for permanent residence? What factors should be considered?

Charles Sturt University recommends:

- recognising time spent studying in Australia as part of any time threshold in considering eligibility for permanent residency;
- recognising time spent studying in regional Australia as part of any time threshold in considering eligibility for permanent residency; and,
- providing consideration to the provision of an extended post-study work rights are lengthened should employment in

regional areas be prioritised by the applicants who find employment in regional areas of Australia.

(9) Modernising Australia's visa arrangements

- (a) What role does the visa system play in ensuring Australia remains attractive to the best and brightest temporary and permanent migrants?

Charles Sturt University recommends:

- that all changes to the visa system are announced with adequate time to prepare and educate the market with clarity around the policy settings of changes to the visa system;
- that consideration be given to administrative processes that increase efficiencies delivering savings in time processing and consistency in outcomes;
- that changes to the visa system are made with reference to the settings imposed by key international education competitor markets; and,
- the retention of a class of visa that support post study work opportunities for graduates of Australian Universities.

- (b) Will an efficient visa system that is simple to understand and quickly assesses risk make Australia a more attractive destination? Why?

Charles Sturt University recommends that:

- consideration be given to administrative processes that increase efficiencies delivering savings in time processing and consistency in outcomes;
- changes to the visa system are made with reference to the settings imposed by key international education competitor markets; and,
- all changes to the visa system are announced with adequate time to prepare and educate the market with clarity around the policy settings of changes to the visa system.

- (c) To what extent should the Government collect biometrics from visa applicants?

Charles Sturt University recommends that all changes to the visa system are announced with adequate time to prepare and educate the market with clarity around the policy settings of changes to the visa system.

1.2 **Delivering visa services for Australia - Market Consultation Paper**

- (1) Ways to create an efficient, sustainable and innovative service delivery model

Charles Sturt University recommends:

- consideration be given to administrative processes that increase efficiencies delivering savings in time processing and consistency in outcomes; and,
- changes to the visa system are made with reference to the settings imposed by key international education competitor markets.

- (2) New technologies and innovative solutions to help design and build a global digital visa processing platform

Charles Sturt University recommends that:

- consideration be given to administrative processes that increase efficiencies delivering savings in time processing and consistency in outcomes; and,
- changes to the visa system are made with reference to the settings imposed by key international education competitor markets.

1.3 **Attracting and Retaining World-Class Teaching, Learning and Research Workforce**

Refer commentary and suggestions provided in Section 4.4 below.

1.4 **Distinguished Talent Pathway – Barriers to World-Class Workforce Attraction**

Refer commentary and suggestions provided in Section 4.5 below.

2. Consultation Framework

The Department has proposed a consultation framework that addresses:

- Why is there a need for visa reform?
- What are the improvements and what will they achieve?
- When will the improvements come into effect?
- What will the changes look like?
- Will these changes impact on Australia's attractiveness as a migrant destination country?
- What will happen to people who have an existing visa application?
- How will we be able to better verify the identity of individuals coming to Australia?
- Will there be any changes to the way in which the Department delivers its client services?
- How will the reforms affect the Department's current service providers?

Charles Sturt University is pleased to provide a submission to the Australian Government's investigation of reform options for modernising Australia's visa system. We have prepared a comprehensive and detailed submission containing commentary of our view and position of the Department of Immigration and Border Protection's policy consultation and market consultation papers that are detailed above.

Drawing on our century-plus, second to none, hands-on experience in regional teaching, learning and research, as well as building on our commentary, view and position of the Department's two consultation papers, Charles Sturt University also proposes a range of recommendations, that we believe would strengthen Australia's visa system.

Adopting our recommendations would further internationalise the growth and development of regional, rural and remote Australia and in particular, would contribute greatly to the economic growth of regional Australia by significantly and substantially growing the number of international students studying and living in our regional cities and towns.

3. Charles Sturt University

Charles Sturt University is Australia's largest regional university, with more than 43,000 students and approximately 2,000 FTE staff. Established in 1989, the University traces its origins to the formation of the Bathurst Experimental Farm and Wagga Wagga Experimental Farm in the 1890s. In one form or another, research, innovation and education has been integral to the University's character and mission for more than a century.

Charles Sturt University is a unique multi-campus institution with campuses at Albury-Wodonga, Bathurst, Canberra, Dubbo, Goulburn, Manly, Orange, Parramatta, Port Macquarie and Wagga Wagga, as well as various study centres located throughout regional and rural south-eastern Australia.

The University's commitment to the development and sustainability of rural and regional Australia is informed by the unique research focus undertaken, and the partnerships it has formed with each of its campus' local communities, local industry, and with the broader regions it serves.

CSU offers a comprehensive suite of research and academic training programs that focus on addressing rural and regional labour market needs, growing regional economies, and preparing students for the jobs of the new economy through rural and regional Australia.

Particularly in health and medical related disciplines, Charles Sturt University seeks to address key training and equality of access issues across our rural and regional footprint, ensuring the critical supply of health professionals into local markets.

As one of Australia's largest online and distance education providers Charles Sturt University has been able to leverage its course profile and specialist expertise in education provision for the delivery of nationally available study programs. These programs support labour market skills development regardless of student location.

Our rural and regional focuses, as well as strength in online and distance education, position's Charles Sturt University as a leading institution in providing higher education opportunities to first-in-family applicants, mature-aged students, as well as those from disadvantaged backgrounds.

Increasing participation of Indigenous Australians in higher education has been a key focus area of the University's mission and ethos. Charles Sturt University consistently works in collaboration with Indigenous communities across our footprint to ensure access and develop links into the University. Our position as one of the top Australian universities for Indigenous participation is proof of our strong background in this regard.

The success of the University is demonstrated by its sector-leading performance in work-integrated learning, graduate employment and graduate incomes. Underpinning this success is the close links that the University has forged with industry, both regionally and nationally.

For example, the University is internationally recognised as a leader in work-integrated learning with students spending extended periods in employment with our industry partners as part of their degree learning and applying their knowledge in practice.

Research excellence, with a strong commitment to addressing the complex regional needs through innovation, has long been at the centre of Charles Sturt University's mission.

As evidenced by the recent Excellence in Research for Australia results (ERA 2015), Charles Sturt University is recognised internationally for competitive research strengths in agricultural science, horticultural production, food and wine sciences, crop and pasture production, veterinary science, animal production, education, curriculum and pedagogy, environmental science, applied ethics, philosophy, religious studies, criminology, nursing and marketing.

Charles Sturt University has a proud tradition of delivering high-quality research that creates new knowledge, benefits people's lives, enhances the profitability of regional industries and helps communities grow and flourish. Through its Higher Degree by Research programs, Charles Sturt University is training the next generation of researchers and professionals who use critical thinking and seek to influence the world for the better.

The recently announced AgriSciences Research and Business Park, to be located on the Wagga Wagga campus exemplifies our industry focus. The AgriSciences Research and Business Park will facilitate industry engagement and collaboration, economic growth, wealth creation, employment and skills development. Success will be evidenced by the recognition of Wagga Wagga as a world-standard centre for agricultural innovation, research and development, extension, education and training.

Today, Charles Sturt University continues a 100-year tradition of engagement and leadership with our local communities, of research and innovation in collaboration with industry, expansion in the educational opportunities offered to our diverse student body, and preparing students for employment markets emerging with the evolution of regional and the national economy.

4. Submission to Inquiry

Charles Sturt University is pleased to provide a submission to the Australian Government's investigation of reform options for Australia's visa system. We have prepared a comprehensive and detailed submission containing commentary of our view and position of possible options for reform Australia's visa system.

Building on our commentary, view and position, Charles Sturt University also proposes a range of recommendations that we believe would strengthen Australia's visa system. Adopting our recommendations would strengthen Australia's visa system, particularly with regards Australia's global competitiveness in the international student market.

Charles Sturt University's submission has been prepared based on the Department's policy consultation and market consultation papers, of which overviews are provided at Sections 2.5 and 2.6 of this submission.

4.1 Charles Sturt University - International Student Contribution to Regional Economies

Charles Sturt University is a very strong supporter of the Commonwealth Government's international education policies and programs including *National Strategy for Education 2025*, see <https://nsie.education.gov.au> and refer Appendix II and the Commonwealth's roadmap *Australian International Education 2025*, see <https://www.austrade.gov.au/Australian/Education/Services/Australian-International-Education-2025> and refer Appendix III. Most states and territories have complementary international student policies and programs, including investment and export attraction initiatives, again Charles Sturt University is fully supportive of these initiatives. Charles Sturt University supports the international education policy outcomes and program objectives of:

- strengthening the fundamentals of Australia's education, training and research system and our regulatory, quality assurance and consumer protection arrangements;
- transformative partnerships between people, institutions and governments, at home and abroad; and,
- competing globally by responding to global education and skills needs and taking advantage of emerging opportunities, while achieving,
- nearly 1,000,000 international students and approaching \$50 billion in annual export revenues by 2025.

Furthermore, Charles Sturt University believes that, while the current international student visa arrangements have served Australia well, they must be strengthened to ensure Australia's future competitiveness in the international student market is not only maintained by enhanced. This will be essential to meet the Government's policy outcomes and program objectives set out above, including growing Australia's international student cohort to around 1,000,000 with some \$50 billion or so in export revenue per annum.

Ensuring the future competitiveness of Australia's student visa arrangements will be essential to meet the Commonwealth's stated international education and export revenue goals and objectives, particularly given the increasing competition from traditional competitors such as New Zealand, Canada and the UK, but also the increased ease of access for foreign nationals to countries like Japan, Germany (Schengen Zone), Malaysia and China, noting that training and education providers in countries like Japan, Germany and China are increasing delivering courses in English.

The value of international education to the Australian economy has been widely discussed in recent years, with the ABS valuing exports from international education for 2014-15 at \$18.8 billion and Australia's third largest export¹. A recent report commissioned by the Australia Government indicates that international education contributes an additional \$935 million in export revenue through education related expenses by those on a non-student visa studying English language courses; tourism expenditure by visiting friends and relatives (VFR) who come to Australia to visit an international student; revenue from offshore campuses; and revenue from international students undertaking study tours at Australian public schools².

Charles Sturt University is committed to supporting our local communities in regional southern New South Wales and northern Victoria and across regional, rural and remote Australia to ensure they are equipped to engage in the global economic context and have real access to knowledge, skills and research to create sustainable and stable futures.

In addition to the economic benefits being realised by regional southern New South Wales and northern Victoria, there are a broad range of social and cultural benefits that stem from international education, particularly in non-metropolitan areas of Australia:

- Through interacting with international students, domestic students are exposed to different cultures and ways of thinking. This supports the development of more 'global citizens' and can develop lasting relationships and networks with far reaching benefits, including longer term trade and diplomatic relationships.
- International education builds the cultural diversity of our communities and can contribute to more inclusive and culturally rich society – this is crucially important in our regional cities to globalize them and make them livable attractive for people to relocate from metropolitan areas to regional Australia.
- International education provides a strong platform for leveraging Australia's global reputation, particularly in research and sharing knowledge. CSU has developed a global reputation as a leader in research and education in regional, rural and remote industry and community development.

¹ Deloitte Access Economics, 2015, *Value of International Education to Australia*, Australian Government, Canberra.

² Ibid.

In understanding the contribution that international education makes to the economy and the social fabric of society, it is easy to understand the increased global competition for international students.

The world over, recent years have seen governments and education institutions investing heavily to increase international student numbers. Domestically, there has been a strong focus by state/territory and the Australian Government to develop policy frameworks to guide decision making and support growth across the sector. France, Germany, Japan and Canada, who together with the US, UK and Australia comprise more than half the global market, with all of these countries actively targeting international education as a means to not only reinvigorate their economies, but to restructure their industrial bases.

Further, emerging players like China, Malaysia and Chile are investing in the expansion of their international education services, especially in the higher education sector. They are directly targeting existing markets by developing and delivering higher education courses that are taught in English. As with any maturing industry, competition is increasing at local, national and international levels. These countries are actively pursuing offshore delivery, as are many Australian institutions.

In responding to the increased competition globally, maintaining and building Australia's share of the international education market will require development and maintenance of a sustainable competitive advantage.

This will include maintaining our reputation for quality institutions, professional tuition and assured personal safety, and building on the characteristics of Australian international education offering that are unique to us such as the unique offerings living and studying in regional areas.

While there is increased competition for international students both in Australia and from education institutions globally, there are significant opportunities to grow international education in regional Australia. This is particularly true for regional New South Wales and Victoria, which are already leaders in international education within regional Australia.

There are also a number of challenges that face government, providers and broader stakeholders in Australia to fully realise these opportunities, such as:

- alignment of immigration policy with international education student recruitment strategies, particularly in emerging markets;
- changing perceptions of studying in regional areas as opposed to metropolitan areas; and,
- high costs of developing brand recognition, particularly at an institutional or regional level.

Promoting and leveraging the unique student experience and the strengths of universities in regional areas of Australia are key in overcoming these challenges. Regional universities have considerable research strengths in fields such as regional, rural and remote health and education, agriculture and mining sciences, such as CSU which is globally recognised as an education leader in regional, rural and remote community economics, sociology and health and education.

Further, the close-knit communities in regional Australia can provide cultural and social immersion opportunities that are no longer available in larger metropolitan areas for international students.

Approximately five per cent of Australian international student enrolments are based in regional areas. Charles Sturt University is committed to supporting our local communities in regional southern New South Wales and northern Victoria and across regional, rural and remote Australia to ensure they are equipped to engage in the global economic context and have real access to knowledge, skills and research to create sustainable and stable futures.

In 2016, over 32,000 of the 43,000 students at Charles Sturt University were studying at a regional campus, however only a small proportion of these students are international students. While there is increased competition for international students both in Australia and from education institutions globally, there are significant opportunities to grow international education in regional Australia.

This is particularly true for regional New South Wales and Victoria, which are already leaders in international education within regional Australia.

There are also a number of challenges that face government, providers and broader stakeholders in Australia to fully realise these opportunities, such as:

- alignment of immigration policy with international education student recruitment strategies, particularly in emerging markets;
- changing perceptions of studying in regional areas as opposed to metropolitan areas; and,
- high costs of developing brand recognition, particularly at an institutional or regional level.

Promoting and leveraging the unique student experience and the strengths of universities in regional areas of Australia are key in overcoming these challenges. Regional universities have considerable research strengths in fields such regional, rural and remote health, education and agriculture, such as Charles Sturt University which is globally recognised for. The case studies below highlight the attractiveness for international students studying agricultural sustainability that aligns with climate similarities for application for the graduates.

The close-knit communities in regional Australia can provide cultural and social immersion opportunities that less available in larger metropolitan areas for international students. Studying in regional Australia offers an opportunity to reduce costs around accommodation and cost of living for international students and reduce the infrastructure burdens in metropolitan areas.

- (1) International Student Case Studies – Charles Sturt University’s Regional Campuses
 - (a) Chanthorn Sock, Cambodia: Master of Sustainable Agriculture, Orange Campus

“This course has given me the knowledge and skills to help Cambodia achieve their sustainable development goals. It has also equipped me with the skills and knowledge to assist Cambodian government policy makers to develop policies in relation to using our natural resources in sustainable manner for the long term, and assist Cambodian farmers to improve agricultural productivity without harming environment and ecosystem.

What I enjoyed the most about studying at Charles Sturt University was that I learnt to be independent, and think critically and holistically. Charles Sturt University staff were very supportive and try their best to support their students.

While in Australia I experienced the Australian landscape and culture, and the Australian agricultural systems, and the Australian political system. I found Australian people are generally open, kind and friendly, and will provide support if you approach them for help.”

- (b) Henry Geoffrey Hunga, Malawi, Master of Sustainable Agriculture in Orange

“I chose Charles Sturt University because they were offering the course I wanted to study and also the weather in NSW was similar to my home country which I thought would be more applicable to my work back in Malawi.

Life is good and the people friendly. I was not sure if I would be able to get a part time job as I study but I got one and could manage it with studies. I stayed on campus where I could maximize on the use of the library and other on-campus amenities. I also enjoyed staying in regional Australia - you save on transport costs and utility bills. I miss the local produce of Orange – in particular the wines and lamb chops - they were yummy!!!”

- (c) Karina Davila, Peru, Bachelor of Applied Science (Outdoor Recreation and Ecotourism) Port Macquarie

“I’m enjoying this course and chose it to help broaden my career opportunities in the outdoor education industry and National Parks. I love the Australian lifestyle and the beaches in Port Macquarie. It helps to be a little adventurous and I like the calmer life of a small city but at the same time, the reward is that you can connect more with nature as there are a lot of outdoor activities to do. I have also found it easy to meet people on campus, and through local activities like running club and hiking.’ Karina from Peru, Outdoor Recreation and Ecotourism.”

4.2 Policy Consultation Paper - Visa Simplification: Transforming Australia's Visa System

- (1) Scope for reduction in the number of visas from 99 at present, to approximately ten visas.

- (a) **Position of Charles Sturt University**

Charles Sturt University recognises the benefits arising from the Simplified Student Visa Framework which came into force in July 2016, reducing the number of student visas from eight to two. Charles Sturt University recognises that a simplification of the Visa System can create efficiencies which would increase Australia's attractiveness as an international education destination.

Any changes that reduce the number of visas to 10 should also increase the rate at which visas are processed. Such efforts to maximise the efficiency of visa processing timeframes through technology and simplification processes would be beneficial as there is a high tendency for students to accept institutional offers shortly after visa approval has been provided. In such an environment where prospective students may have offers from multiple institutions in competitive markets, it is essential that Australia's visa system can remain competitive in processing times with our key competitive markets.

However, the simplification of the visa system should be supported by a framework which can adequately reflect the differences and nuances presented in each of the 10 visa categories. For example, Charles Sturt University values the ability for sub-classes within the student visa system to adequately recognition of the differences in visas between research, post and undergraduate or vocational education.

A simplified visa framework should also be capable of recognising the relationships between the reduced number of visas with regard to inter-linked eligibility of visa holders.

Finally, Charles Sturt University is the user of a number of visas that are specific to activities, such as study, research, observation (visits) and work. Charles Sturt University welcomes a reduction in the number of visas as long as there is no change to the existing pathways the University can pursue in attracting and retaining highly skilled individuals.

Possible and proposed reductions in visa types should not lead to the current and existing pathways being lost for Academics, Researchers and Core Professional staff whether it be for work, research or training opportunities.

(b) **Charles Sturt University's Recommendations**

Charles Sturt University recommends that:

- all changes to the visa system are announced with adequate time to prepare and educate the market with clarity around the policy settings of changes to the visa system;
- changes to the visa system reduce processing times and ensure consistency in outcomes;
- any changes to the visa system are made with recognition to the differing characteristics of applicants in Australia's diverse education system;
- the retention of a class of visa that support post study work opportunities for graduates of Australian universities; and,
- that the government should maintain short term visa pathways (such as the current 600, 601, 651 and 400) that allow for overseas academics and specialists to enter Australia for short periods of time to undertake highly specialised activities and attend academic meetings.

(2) Delineation between temporary entry and long-term or permanent residence.

(a) **Position of Charles Sturt University**

Charles Sturt University recognises the importance of delineation between the types of residency in Australia. However, in ensuring the delineation there must also be clarity regarding the interlinking relationships between short term visas which can affect eligibility between the types of residency.

Student visa classes should recognise the purpose for which entry is required, and student visas must also reflect the type of studying being pursued.

There must flexibility in the arrangements to recognise the nature of research or post-graduate study whilst remaining cognisant of the importance of the social wellbeing of students, which are underpinned by certainty and trust in administrative procedures.

Charles Sturt University has a strong history of producing graduates who achieve success in their chosen industries with a current graduate employment rate that is well above the national average. The Temporary Graduate visa (subclass 485) provides post study work rights and is an important and attractive feature of the existing visa system. It enables Charles Sturt University graduates to implement their studies in the environment in which they were taught, consolidating their studies in a professional context. Post-Study work rights are an attractive feature of the Australian higher education sector. The ability for graduates of Australian universities to apply for

these visas contribute to Australia's ability to attract high quality students.

With regards non-student visas, Charles Sturt University offers the following commentary:

- A delineation between temporary entry and long-term or permanent residency is not a current requirement for the tertiary education sector.
- In order to attract and retain highly skilled individuals, universities must be in a position to support pathways for individuals to transition from temporary entry and long-term to that of permanent residency. Furthermore, universities must also be able to support the retention of our best international students.
- Recent (and proposed bi-annual) changes to the Medium to Long Term Strategic Skills List (MLTSSL), have provided the Tertiary Education sector some assistance. However, sponsored employees require more certainty, so that they can make informed decisions about their transition to Australia, otherwise the sector faces a significant hurdle in attracting skilled employees. For instance, it is critical to our operations that the occupations required by Universities (i.e. academics, researchers and core professional occupations) are added to and preserved on the MLTSSL to ensure that there are pathways available to permanent residency.

(b) **Charles Sturt University's Recommendations**

Charles Sturt University recommends the retention of a class of visa that support post study work opportunities for graduates of Australian universities.

- (3) Role a period of provisional residence could play in enhancing the integrity of the visa system and easing the burden on taxpayers.

(a) **Position of Charles Sturt University**

International students contribute to the ongoing success of Australian universities through contribution of diversity in the class room and consumers of Australia's third largest export. To remain competitive and attractive, the Australian visa system must provide stability for visa holders. Charles Sturt University does not support a provisional residency period for short-term visa holders.

With regard to long-term residency visas, policy makers must recognise the nexus between education and employment, and supporting the aspirational desires of students to practice their learnings in the environment in which they were taught. Australia is

an attractive place to live and work. Such lifestyle features increase the desirability to study in Australia. Charles Sturt University believes that should a provisional residency element be required for long term or permanent residency, graduates or time spent studying in Australia be considered favourably. This should be considered in the context of supporting Australian education providers.

It is Charles Sturt University's observation that as employees, individuals would contribute to the tax system and with wages are less likely to burden public services.

With regards non-student visa considerations, Charles Sturt University provides the following further commentary:

- The tertiary education sector is one which aims to attract and retain highly skilled individuals, who ultimately will play a role that will benefit Australian communities, economically, socially and culturally.
- The tertiary education sector is not one where concerns rest in supporting eligibility for welfare payments and services, and it is important for the government to acknowledge this so that changes do not impinge on our ability to operate competitively internationally

(b) **Charles Sturt University's Recommendations**

Charles Sturt University recommends:

- retention of a class of visa that support post study work opportunities for graduates of Australian universities;
- recognising time spent studying in Australia as part of any time threshold in considering eligibility for permanent residency; and,
- a period of provisional residence could indeed assist the enhancement of the integrity of the visa system by securing our investment and retaining our best people. This could be achieved by individuals remaining with their sponsoring institution or their nominated occupation for a defined period. However, the implementation of provisional residence as the only pathway for permanent residency could also be a hindrance for our sector and a flexible approach is necessary in order to:
 - not limit the ability of academics to apply for competitive Category 1 funding;
 - provide settlement opportunities (for example, ability to secure mortgages); and,

- ensure the reduction in exposure to additional costs of living, such as;
 - state-based fees for public schooling; and
 - health care costs.
- (4) Ensuring that our visa system supports Australia as a competitive and attractive destination for temporary and longer-term entrants.

(a) **Position of Charles Sturt University**

The global marketplace for the provision of higher education services is a hyper contested environment with discerning prospective students considering a wide variety of study offerings. In order to remain a competitive and attractive destination, Australian policy settings must be clear and market orientated, while maintaining a robust focus on risk mitigation. Charles Sturt University recommends policy settings that are constructed around six key pillars:

1. Ensure international students maintain access to temporary migration and work rights afforded by student visas. These rights directly affect Australia's market attractiveness. The regulatory settings around student visas are crucial to the long-term sustainability of the Australian international education exports as an attractive value proposition. (*International Education Services*, Productivity Commission 2015).

Charles Sturt University has a strong history of producing graduates who achieve success in their chosen industries with a current graduate employment rate that is well above the national average. The Temporary Graduate visa (subclass 485) provides post study work rights and is an important and attractive feature of the existing visa system. It enables Charles Sturt University graduates to implement their studies in the environment in which they were taught, consolidating their studies in a professional context. Post-Study work rights are an attractive feature of the Australian higher education sector. The ability for graduates of Australian universities to apply for these visas contribute to Australia's ability to attract high quality students.

2. Send clear signals to international students, their parents, and supply chain intermediaries. Changes to the visa system will require significant lead time to be communicated to the market. Inadequate lead time to educate and prepare for the visa changes will reduce the level of confidence prospective students and supply chain intermediaries that feed into the Australian market. The ability to plan for future changes to Australia's visa system with adequate preparation time to educate will ensure a smooth transition without negatively

effecting application outcomes. Higher rates of negative outcomes for student visa applications can have lasting detrimental effects on market reputation. Ongoing uncertainty with respect to changes to the visa system may be considered a market barrier to prospective students. Clarity with regard to existing student visa arrangements and the introduction of and phasing in of new systems would support a smooth transition without damaging market perceptions.

3. Ensure visa application and processing fees remain internationally competitive. Prospective students considering studying in Australia will apply to a range of institutions in a number of markets. Charles Sturt University believes that changes to the Australian visa system should be made with awareness of regulatory settings and policies of Australia's key competitor markets, the United States, the United Kingdom, New Zealand and Canada. The new visa system and framework would ideally provide flexibility to ensure responsiveness to policy changes and settings in other markets. Charles Sturt University notes that this market is price sensitive. Charles Sturt University supports the existing thresholds for application fees and access to funds for living expenses, yet notes that these are both higher than key competitor markets. Charles Sturt University's experience in international student recruitment supports the proposition that the existing visa application fee is currently set at an appropriate point against comparative markets.

Charles Sturt University supports the existing threshold for demonstrated access to funds for living expenses for visa applicants. Charles Sturt University notes however that as at 2016, Australia required international students to demonstrate the highest value of funds for living expenses compared to the United States, the United Kingdom, New Zealand and Canada.

4. Maximise the efficiency of visa processing timeframes. There is a high tendency for students to accept institutional offers shortly after visa approval has been provided. In such an environment where prospective students may have offers from multiple institutions in competitive markets, it is essential that Australia's visa system can remain competitive in processing times with our key competitive markets.
5. Maintain the existing definitions and classifications for student visas that supports dependents and accompanying family members. It is important that the Australian student visa system recognises the diversity of the international student cohort and that the visa system supports the range of responsibilities that students may have. To remain competitive with other markets and retain Australia's attractiveness while not creating barriers for students with families Charles Sturt University notes that the existing

framework and definitions are fit for purpose and supportive of students regardless of their personal relationships.

6. Utilise international competition to deliver strong policy outcomes for regional and remote Australia. There are significant opportunities to grow international education in regional Australia. This is particularly true for regional New South Wales and Victoria, which are already leaders in international education within regional Australia. Growing international education in regional areas can be supported and promoted through immigration and visa processes that increase the attractiveness of regional education by providing increased post-study working rights or recognising time spent studying in regional Australia toward time requirements for eligibility for permanent residency.

As a regional university, Charles Sturt University is committed to supporting our local communities in regional southern New South Wales and northern Victoria and across regional, rural and remote Australia. Charles Sturt University recognises the ongoing challenge to attract and retain skilled workers to regional and remote Australia, particularly in education and health care.

There are a broad range of social and cultural benefits that stem from international education, particularly in non-metropolitan areas of Australia:

- Through interacting with international students, domestic students are exposed to different cultures and ways of thinking. This supports the development of more 'global citizens' and can develop lasting relationships and networks with far reaching benefits, including longer term trade and diplomatic relationships.
- International education builds the cultural diversity of our communities and can contribute to more inclusive and culturally rich society – this is crucially important in our regional cities to globalise them and make them livable attractive for people to relocate from metropolitan areas to regional Australia.
- International education provides a strong platform for leveraging Australia's global reputation, particularly in research and sharing knowledge. Charles Sturt University has developed a global reputation as a leader in research and education in regional, rural and remote industry and community development. International students increase the visibility and reputational of Charles Sturt University's expertise in a global setting.

In understanding the contribution that international education makes to the economy and the social fabric of society, policy levers that increase the attractiveness of studying, and remaining in regional Australia should be utilised.

Charles Sturt University offers international students an opportunity to gain cultural and social immersion opportunities while accessing considerable research strengths in fields such rural and remote health, education and agriculture, skills highly sought after in regional Australia. Graduates who complete their studies in a regional centre are aware of the benefits that working and residing in a regional location provides.

Prospective permanent residence applicants who have completed their studies in a regional location have an awareness of the specific challenges and opportunities that regional Australia provides. Charles Sturt University supports a framework for permanent residency that recognises graduates of Australian universities are well placed to engage in Australian society. Charles Sturt University supports investing in international graduates who have studies in Australia and can in turn, support regional communities after graduation.

With regards non-student visa considerations, Charles Sturt University provides the following commentary:

- the vast number of eminent researchers and academics that have been employed by Australian universities have been via the subclass 457 and then 186/187 pathways. Limiting or restricting such pathways to be highly prescribed and restricted could lead to Australian Universities not being competitive and attractive destinations for temporary and long-term entrants; and,
- Australia's visa system must also be one that is not bureaucratic so that individuals can navigate their way through and satisfy the necessary requirements of living and working in Australia.

(b) **Charles Sturt University's Recommendations**

Charles Sturt University recommends:

- that all changes to the visa system are announced with adequate time to prepare and educate the market with clarity around the policy settings of changes to the visa system;
- that changes to the visa system reduce processing times and ensure consistency in outcomes;
- that the financial support threshold or application fees are not increased against key competitor markets;
- the retention of a class of visa that support post study work opportunities for graduates of Australian Universities;
- no change to existing framework for dependents and other family members extended to student visa holders; and,

- considering increasing the number of student visas for students who elect to study in a non-metropolitan location.

(5) Simplifying our visa arrangements.

(a) What would a system with approximately 10 visas look like?

(b) **Position of Charles Sturt University**

A system with approximately 10 visas would seek to reduce administrative burdens and costs, increase processing times and increase clarity and objectivity in the decision-making process.

Any changes to the visa system must recognise that positive associations with the Australian Government rely upon reputational factors which take time to develop and are fragile. It is essential that there is adequate time to prepare and educate prospective students, parents and intermediaries, to any prospective changes to the regulatory settings lest the sudden changes undermine the long-term confidence in the stability of the Australian visa system.

It is essential that future students, parents and supply chain intermediaries have the information that supports the ability to plan for future changes to Australia's visa system with adequate preparation time to educate will ensure a smooth transition without negatively effecting application outcomes. Higher rates of negative outcomes for student visa applications can have lasting detrimental effects on market reputation. Ongoing uncertainty with respect to changes to the visa system are creating a real and present market barrier to prospective students. Clarity with regard to existing student visa arrangements and the introduction of and phasing in of new systems would support a smooth transition without damaging market perceptions.

Any changes that reduce the number of visas to 10 should also increase the rate at which visas are processed. Such efforts to maximise the efficiency of visa processing timeframes through technology and simplification processes would be beneficial as there is a high tendency for students to accept institutional offers shortly after visa approval has been provided. In such an environment where prospective students may have offers from multiple institutions in competitive markets, it is essential that Australia's visa system can remain competitive in processing times with our key competitive markets.

Charles Sturt University recognises the benefits arising from the Simplified Student Visa Framework which came into force in July 2016, reducing the number of student visas from eight to two.

Australia's education system is widely recognised internationally, from secondary school, vocation education and training through to the tertiary sector and research capacity. Charles Sturt University would note that simplification of the visa system should reflect the differences of each type of student when considering their applications. Currently, sub-classes ensure adequate recognition of the differences in visas between research, post and undergraduate or vocational education.

It is also important to ensure visa application and processing fees remain internationally competitive. Prospective students considering studying in Australia will apply to a range of institutions in a number of markets. Charles Sturt University believes that changes to the Australian visa system should be made with awareness of regulatory settings and policies of Australia's key competitor markets, the United States, the United Kingdom, New Zealand and Canada. The new visa system and framework would ideally provide flexibility to ensure responsiveness to policy changes and settings in other markets.

Charles Sturt University notes that this market is price sensitive. Charles Sturt University supports the existing thresholds for application fees and access to funds for living expenses, yet notes that these are both higher than key competitor markets. Charles Sturt University's experience in international student recruitment supports the proposition that the existing visa application fee is currently set at an appropriate point against comparative markets.

Charles Sturt University supports the existing threshold for demonstrated access to funds for living expenses for visa applicants. Charles Sturt University notes however that as at 2016, Australia required international students to demonstrate the highest value of funds for living expenses compared to the United States, the United Kingdom and Canada.

(c) **Charles Sturt University's Recommendations**

Charles Sturt University recommends that:

- any changes to the visa system are made with recognition to the differing characteristics of applicants in Australia's diverse education system;
- all changes to the visa system are announced with adequate time to prepare and educate the market with clarity around the policy settings of changes to the visa system;
- changes to the visa system reduce processing times and ensure consistency in outcomes; and,
- the financial support threshold or application fees are not increased against key competitor markets.

(6) What factors should we consider when simplifying the visa system?

(a) **Position of Charles Sturt University**

Charles Sturt University advocates that application process for a simplified visa system will be supported by clear, standardised and objective criterion whilst remaining cognisant of the unique characteristics of tertiary level and research students that does not increase processing times.

Charles Sturt University also recognises the highly competitive and contested market place for international education and factors for consideration when simplifying the visa system requires Understanding the features that increase competitive tensions with other markets for the best and brightest students requires comparative consideration of international student visas with regard to fees, financial support, processing times and eligibility to work while on a student visa.

Consideration should be given to the implementation time frame to ensure changes to the visa system are communicated with adequate time to prepare and educate prospective students, parents and intermediaries, to any prospective changes to the regulatory settings lest the sudden changes undermine the long-term confidence in the stability of the Australian visa system. It is essential that future students, parents and supply chain intermediaries have the information that supports the ability to plan for future changes to Australia's visa system with adequate preparation time to educate will ensure a smooth transition without negatively impacting Australia's reputation.

Charles Sturt University also refers the Department, to the University's recent submission to the University's submission to the Inquiry into Regional Development and Decentralisation which is currently being undertaken by the Select Committee of Regional Development and Decentralisation of the House of Representatives of the Australian Parliament, where Charles Sturt University provides extensive commentary and input with regards this matter and the importance of immigration, international students and foreign skilled labour to the economic, social, cultural and environmental vibrancy of regional, rural and remote Australia.

(b) **Charles Sturt University's Recommendations**

Charles Sturt University recommends that:

- assessing visa applications are supported by clear, standardised and objective criteria,
- consideration be given to administrative processes that increase efficiencies delivering savings in time processing and consistency of outcomes,

- all changes to the visa system are announced with adequate time to prepare and educate the market with clarity around the policy settings of changes to the visa system; and,
- the financial support threshold or application fees are not increased against key competitor markets.

Charles Sturt University also refers the Department, to the University's recent submission to the Inquiry into Regional Development and Decentralisation which is currently being undertaken by the Select Committee of Regional Development and Decentralisation of the House of Representatives of the Australian Parliament, which contains a range of recommendations regarding international students studying in regional Australia.

(7) What should be the key characteristics of a simplified and flexible visa system?

(a) **Position of Charles Sturt University**

Charles Sturt University advocates that application process for a simplified visa system will be supported by clear, standardised and objective criterion whilst remaining cognisant of the unique characteristics of tertiary level and research students that does not increase processing times.

Consideration should be given to the implementation time frame to ensure changes to the visa system are communicated with adequate time to prepare and educate prospective students, parents and intermediaries, to any prospective changes to the regulatory settings lest the sudden changes undermine the long-term confidence in the stability of the Australian visa system.

It is essential that future students, parents and supply chain intermediaries have the information that supports the ability to plan for future changes to Australia's visa system with adequate preparation time to educate will ensure a smooth transition without negatively impacting Australia's reputation.

(b) **Charles Sturt University's Recommendations**

CSU recommends that:

- assessing visa applications are supported by clear, standardised and objective criteria; and,

- consideration be given to administrative processes that increase efficiencies delivering savings in time processing and consistency of outcomes.

(8) Temporary and permanent residence.

(a) What distinctions should apply to temporary and permanent visas?

(i) **Position of Charles Sturt University**

Policy makers should be cognisant of the nexus between education and employment, recognising and supporting the aspirational desires of students to practice their learnings in the environment in which they were taught. In recognising that Australia is an attractive place to live and work, opportunities to increase the value of studying in Australia should not be viewed negatively, but as a way of supporting Australian education providers.

There is an opportunity to provide incentives for international students studying in regional locations, through both post-study work rights or as recognition for time spent in Australia for permanent residency, this increases the benefits of studying in regional communities which may not be fully realised.

Charles Sturt University graduates are trained and equipped for providing specialised services in regional and remote communities across agriculture, education and health care to name but a few. In recognition of the skills shortages in regional and remote Australia, providing incentives for graduates to study and remain in regional Australia provides a social benefit the broader community. Prospective permanent residence applicants who have completed their studies in a regional location have an awareness of the specific challenges and opportunities that regional Australia provides.

Charles Sturt University supports a framework for permanent residency that recognises graduates of Australian universities are well placed to engage in Australian society. Charles Sturt University supports investing in international graduates who have studies in Australia and can in turn, support regional communities after graduation.

(ii) **Charles Sturt University's Recommendations**

Charles Sturt University recommends:

- the retention of a class of visa that support post study work opportunities for graduates of Australian universities;

- considering increasing the number of student visas for students who elect to study in a non-metropolitan location;
- recognising time spent studying in Australia as part of any time threshold in considering eligibility for permanent residency; and,
- recognising time spent studying in regional Australia as part of any time threshold in considering eligibility for permanent residency.

(b) What requirements should underpin a migrant's eligibility for permanent residence?

(i) **Position of Charles Sturt University**

Charles Sturt University recognises the benefits of prospective migrants spending a period of time in Australia before becoming eligible for permanent residency. This provides an opportunity for prospective visa applicants to gain cultural and social immersion opportunities.

Prospective permanent residence applicants who have completed their studies in a regional location have an awareness of the specific challenges and opportunities that regional Australia provides. Charles Sturt University supports a framework for permanent residency that recognises graduates of Australian universities are well placed to engage in Australian society. Charles Sturt University supports investing in international graduates who have studied in Australia and can in turn, support regional communities after graduation.

There are multiple beneficiaries of international students and researchers engaging in regional and remote Australian communities. The benefits of studying in regional Australia, such as lifestyle features, authentic Australian experiences and lower costs of living combined with accessing world class education are not well understood or promoted to an international market.

However, Charles Sturt University graduates who complete their studies in regional centres are aware of the benefits that working and residing in a regional location provides and have the skills gained from learning in a regional environment. Prospective permanent residence applicants who have completed their studies in a regional location have an awareness of the specific challenges and opportunities that regional Australia provides.

Charles Sturt University supports a framework for permanent residency that recognises the time that graduates of Australian universities have already spent engaged in the Australian community and are well placed to contribute to Australian society.

In particular, Charles Sturt University supports investing in international graduates who have studied in regional Australia and wish to support regional communities after graduation, by elevated recognition of time spent in regional communities as part of any time period requirement for permanent residency. Such recognition would assist in drawing talent and skills to regional Australia, from an international community who have skills and attributes specifically gained in regional Australia.

(ii) **Charles Sturt University's Recommendations**

Charles Sturt University recommends:

- recognising time spent studying in Australia as part of any time threshold in considering eligibility for permanent residency; and,
- recognising time spent studying in regional Australia as part of any time threshold in considering eligibility for permanent residency.

- (c) Should a prospective migrant spend a period of time in Australia before becoming eligible for permanent residence? What factors should be considered?

(i) **Position of Charles Sturt University**

Charles Sturt University recognises the benefits of prospective migrants spending a period of time in Australia before becoming eligible for permanent residency. This provides an opportunity for prospective visa applicants to gain cultural and social immersion opportunities.

Prospective permanent residence applicants who have completed their studies in a regional location have an awareness of the specific challenges and opportunities that regional Australia provides. Charles Sturt University supports a framework for permanent residency that recognises graduates of Australian universities are well placed to engage in Australian society. Charles Sturt University supports investing in international graduates who have studied in Australia and can in turn, support regional communities after graduation.

There are multiple beneficiaries of international students and researchers engaging in regional and remote Australian communities. The benefits of studying in regional Australia, such as lifestyle features, authentic Australian experiences and lower costs of living combined with accessing world class education are not well understood or promoted to an international market.

However, Charles Sturt University graduates who complete their studies in regional centre are aware of the benefits that working and residing in a regional location provides and have the skills gained from learning in a regional environment. Prospective permanent residence applicants who have completed their studies in a regional location have an awareness of the specific challenges and opportunities that regional Australia provides.

Charles Sturt University supports a framework for permanent residency that recognises the time that graduates of Australian universities have already spent engaged in the Australian community and are well placed to contribute to Australian society. In particular, Charles Sturt University supports investing in international graduates who have studied in regional Australia and wish to support regional communities after graduation, by elevated recognition of time spent in regional communities as part of any time period requirement for permanent residency. Such recognition would assist in drawing talent and skills to regional Australia, from an international community who have skills and attributes specifically gained in regional Australia.

(ii) **Charles Sturt University's Recommendations**

Charles Sturt University recommends:

- recognising time spent studying in Australia as part of any time threshold in considering eligibility for permanent residency;
- recognising time spent studying in regional Australia as part of any time threshold in considering eligibility for permanent residency; and,
- providing consideration to the provision of an extended post-study work rights are lengthened should employment in regional areas be prioritised by the applicants who find employment in regional areas of Australia.

(9) Modernising Australia's visa arrangements

(a) What role does the visa system play in ensuring Australia remains attractive to the best and brightest temporary and permanent migrants?

(i) **Position of Charles Sturt University**

The regulatory settings around student visas are crucial to the long-term sustainability of the Australian international education exports as an attractive value proposition. (*International Education Services*, Productivity Commission 2015). The international education market is highly contested and is underpinned by the visa system. When students, parents and intermediaries make decisions, often the first level of formal engagement with the Australian Government is the visa system. Australia's reputation as a fair, consistent and modern environment is reflected through this first phase of engagement and frames future perspectives.

The process should be simple, consistent and provide a degree of certainty to visa applicants and holders. Effective and consistent communication with students, parents and intermediaries is essential to long term success for attracting the best and brightest temporary and permanent migrants. The administrative processes should deliver consistent outcomes in a timely manner, utilising modern technology and platforms. Clarity around policy settings is required to ensure that decision makers are able to consider the medium to long term implications of choosing to study in Australia such as eligibility for post-work study rights.

(ii) **Charles Sturt University's Recommendations**

Charles Sturt University recommends:

- that all changes to the visa system are announced with adequate time to prepare and educate the market with clarity around the policy settings of changes to the visa system;
- that consideration be given to administrative processes that increase efficiencies delivering savings in time processing and consistency in outcomes;
- that changes to the visa system are made with reference to the settings imposed by key international education competitor markets; and,

- the retention of a class of visa that support post study work opportunities for graduates of Australian Universities.

(b) Will an efficient visa system that is simple to understand and quickly assesses risk make Australia a more attractive destination? Why?

(i) **Position of Charles Sturt University**

Prospective students considering studying in Australia will apply to a range of institutions in numerous key markets. It is Charles Sturt University's experience that prospective students have a tendency to accept the university offer as shortly after the visa approval is provided. As a result, clarity and speed around the Australian visa process will increase the attractiveness of Australian universities when applicants make decisions as to accepting offers.

Improved clarity and greater speed would reduce and ideally eliminate transactions costs for prospective students, including ease of understanding, time of decision making and direct financial costs. These are all areas where Australia is increasingly at a disadvantage in the international student marketplace.

Consideration should be given to the implementation time frame to ensure changes to the visa system are communicated with adequate time to prepare and educate prospective students, parents and intermediaries, to any prospective changes to the regulatory settings lest the sudden changes undermine the long-term confidence in the stability of the Australian visa system.

It is essential that future students, parents and supply chain intermediaries have the information that supports the ability to plan for future changes to Australia's visa system with adequate preparation time to educate will ensure a smooth transition without negatively impacting Australia's reputation.

Australia is also considered more attractive if there is clarity and stable outlooks as to future eligibility for other visas such as post-study working rights.

(ii) **Charles Sturt University's Recommendations**

Charles Sturt University recommends that:

- consideration be given to administrative processes that increase efficiencies delivering savings in time processing and consistency in outcomes;

- changes to the visa system are made with reference to the settings imposed by key international education competitor markets; and,
- all changes to the visa system are announced with adequate time to prepare and educate the market with clarity around the policy settings of changes to the visa system.

(c) To what extent should the Government collect biometrics from visa applicants?

(i) **Position of Charles Sturt University**

Charles Sturt University has no position on the collection of biometrics however notes that consideration should be given to the implementation time frame to ensure changes to the visa system with regard to the collection of biometrics are communicated with adequate time to prepare and educate prospective students, parents and intermediaries, to any prospective changes to the regulatory settings lest the sudden changes undermine the long-term confidence in the stability of the Australian visa system.

It is essential that future students, parents and supply chain intermediaries have the information that supports the ability to plan for future changes to Australia's visa system with adequate preparation time to educate will ensure a smooth transition without negatively impacting Australia's reputation.

(ii) **Charles Sturt University's Recommendations**

Charles Sturt University recommends that all changes to the visa system are announced with adequate time to prepare and educate the market with clarity around the policy settings of changes to the visa system.

4.3 **Delivering visa services for Australia - Market Consultation Paper**

(1) Ways to create an efficient, sustainable and innovative service delivery model.

(a) **Position of Charles Sturt University**

In delivering an efficient, sustainable and innovative service delivery model it is important to ensure that the new visa system remains internationally competitive for both time processing and costs. Charles Sturt University notes that this market is price sensitive.

Consideration should be given to the implementation time frame to ensure changes to the visa system are communicated with adequate time to prepare and educate prospective students, parents and intermediaries, to any prospective changes to the regulatory settings lest the sudden changes undermine the long-term confidence in the stability of the Australian visa system.

It is essential that future students, parents and supply chain intermediaries have the information that supports the ability to plan for future changes to Australia's visa system with adequate preparation time to educate will ensure a smooth transition without negatively impacting Australia's reputation.

(b) **Charles Sturt University's Recommendations**

Charles Sturt University recommends:

- consideration be given to administrative processes that increase efficiencies delivering savings in time processing and consistency in outcomes; and,
- changes to the visa system are made with reference to the settings imposed by key international education competitor markets.

(2) New technologies and innovative solutions to help design and build a global digital visa processing platform.

(a) **Position of Charles Sturt University**

It is important to ensure that new technologies and innovative solutions support a system in which visa application processes and processing fees remain internationally competitive. The new visa system and framework would ideally provide flexibility to ensure responsiveness to policy changes and settings in other markets. Charles Sturt University notes that this market is price sensitive. Charles Sturt University supports the existing thresholds for application fees and access to funds for living expenses, yet notes that these are both higher than key competitor markets.

Consideration should be given to the implementation time frame to ensure changes to the visa system are communicated with adequate time to prepare and educate prospective students, parents and intermediaries, to any prospective changes to the regulatory settings lest the sudden changes undermine the long-term confidence in the stability of the Australian visa system. It is essential that future students, parents and supply chain intermediaries have the information that supports the ability to plan for future changes to Australia's visa system with adequate preparation time to educate will ensure a smooth transition without negatively impacting Australia's reputation.

(b) **Charles Sturt University's Recommendations**

Charles Sturt University recommends that:

- consideration be given to administrative processes that increase efficiencies delivering savings in time processing and consistency in outcomes; and,
- changes to the visa system are made with reference to the settings imposed by key international education competitor markets.

4.4 **Attracting and Retaining World-Class Teaching, Learning and Research Workforce**

Universities and research institutes should be exempt from the Skilling Australians Fund levy, which will require sponsors to pay \$1800 per year for each new TSS visa applicant and \$5000 for each 186/187 applicant, to come into effect from 1 March 2018, as:

- Universities already expend resources ensuring that their employees receive ongoing training.
- The levy will be a drain on the already limited resources of Universities.
- If the government proposes that the monies raised by the levy be used by universities, then it is unnecessary for universities to be contributing to the Fund.

When universities nominate persons for professional occupations (for example, Vice-Chancellor, Deputy Vice-Chancellor, Philanthropy Director or Manager, Sales and Marketing Manager or General Manager, to name a few) for 186 purposes, the nominee:

- should be age exempt *or* the age limit should be raised to at least 60:
 - Universities hire specialist professionals based on their many years of relevant work experience. Many such persons are aged between 45 – 60. The chances of attracting such persons to specialist roles in Australia are very low, when a pathway to permanent residency is not available to them.
- should not be required to undertake a skills assessment.
 - The process of a skills assessment is burdensome, costly and causes delays. In some instances, assessing bodies have been known to assess a person's skills as not suitable (which means that the person is ineligible for a 186 Direct Entry Stream visa). Universities are most ideally placed/qualified to determine whether a candidate has suitable skills for the position in question.

An English language exemption based on salary should be reintroduced for 457 academic and professional university appointments. Before 1 July 2017, an English language exemption existed for those candidates on a base salary of at least \$96,400 excluding super.

- An English language test is burdensome, costly and results in processing delays, it is also very rarely if ever required as all academics publish in English language journals.
- And, in addition, universities are well placed to determine whether a candidate has the appropriate English language skills.

Universities should be exempt from Labour Market Testing for 457/TSS purposes from March 2018. In many cases, universities undertake a rigorous LMT process, as part of their own internal procedures. However, in some cases, the hires are strategic and do not involve LMT. Given the specific targeting of the candidate in such circumstances, it should not be necessary for the University to also undergo an LMT process.

4.5 Distinguished Talent Pathway – Barriers to World-Class Workforce Attraction

The Distinguished Talent Pathway Visa (DTV) is not a suitable pathway for all academics (Levels B-E). Only the very top academics in their field (on a global scale) would be eligible for a DTV. Only 200 are granted a year across all professions, the arts, sports, research and academia. Even if this quota were increased, the requirements to be met are such, that only the very top performing most eminent academics, who are internationally recognised as such in their particular field are eligible for this visa.

Typically, academics and researchers who have obtained this visa are highly cited and published in their field (h-index usually over 40 with at least 100 publications in leading high impact journals), are globally recognised by their peers as one of the world leaders in that field, have been awarded medals or high honours by the relevant learned academies and societies in their field, have been admitted as members of learned academies and are sought after and invited to present as key note speakers etc, at international conferences.

Separately, unlike a subclass 186/187 permanent residency application, a DTV application is accompanied by multiple letters of reference and extensive submissions attesting to the global standing and eminence of the applicant in question. Aside from being a time consuming and labour intensive preparation process, involving interviews with referees of equally high standing verifying that the applicant in question is a world-leader in their field and one of their peers, this visa pathway was clearly designed to secure permanent visas for a minority of exceptional and extraordinary academics and researchers who for whatever reason don't satisfy the requirements of the mainstream subclass 186/187 pathways but who Australia would like to retain due to the significant skills and benefits that they bring.

The requirements include that the applicant:

- Has an internationally recognised record of exceptional and outstanding achievement in a profession, a sport, the arts, or academia and research.
- Is still prominent in the area.
- Would be an asset to the Australian community.
- Would have no difficulty getting employment, or in becoming established independently in your field in Australia.
- Has been nominated by an eligible person or organisation.
- Meets health and character requirements.

If they are 55 years of age or older when applying, they must be of exceptional benefit to the Australian community. That is, they must demonstrate that by residing in Australia the Australian community will benefit, economically, socially or culturally, or that they will be responsible for raising Australia's sporting, artistic or academic standing internationally. This means that their settlement would contribute to the nation as a whole - not just a local community.

International achievement is taken as requiring the applicant to demonstrate extraordinary and remarkable abilities, be superior to others in their field and have a record of sustained achievement that is unlikely to diminish in the future.

Their achievements need to be acclaimed as exceptional in any country where the relevant field is practised. The field would also need to have recognition and acceptance in Australia as well as international standing.

They must demonstrate current prominence in their field. This is typically attested to through letters of reference from other leading academics/researchers in the field. These letters are sourced globally via interview.

In light of the above, the DTV program as it currently stands, is only for world leading eminent scientists or researchers. It would certainly not be the case that all senior academics and researchers that universities wish to attract to Australia would be eligible for this visa but only those that are pre-eminent international research leaders. The DTV in no way provides an alternative permanent residency visa pathway for the vast majority of Academics Levels B-E.

It is also worth considering here the vast number of eminent researchers and academics that have been employed by Australian universities via the subclass 457 and then 186/187 pathways who, while they are highly respected, recognised and critically important contributors to their respective fields, but not leaders in their field, would not have been able to remain permanently in Australia had the DTV pathway been the only path available to them.

This is especially significant with respect to early-mid career researchers and academics rather than their mid-end career counterparts who are more likely to be eligible for the DTV. It also encompasses Deputy-Vice Chancellors for Research and International who may not yet be leaders in the field but who show exceptional promise for the future.

5. Conclusion

Charles Sturt University's interest in reform and modernisation of Australia's visa arrangements is system-wide, however the focus of our input to University Australia's submission centres around the international student visa element of the broader visa system.

However, Charles Sturt University has a keen interest in ensuring a world-class and internationally competitive visa system for Australia that continues to aid regional development through permanent attraction and retention of skilled migrants to regional Australia, the ability for mega-projects to upscale and downscale their workforces using foreign labour where skilled shortages exists on a temporary basis, the continued successful integration of humanitarian refugees in regional communities and the unimpeded free-flow of foreign academics and national with advanced STEM qualifications.

With regards the international student visa element of the broader visa system, Charles Sturt University provides the following input to Universities Australia's submission to the Department's review process.

1. As of 2016, Charles Sturt University had a total of 6,800 international students studying on Australian international student visas. While we are currently working through the direct and flow-on economic impact of the presence of our international student load in each of the regional cities in which we operate, we can confirm that the economic and social impact of their presence is strongly positive for the communities in which we operate.
2. Charles Sturt University's current international student load, represents double-digit growth over the five years since 2012 which is consistent with Australia's growth and success in the international student market.
3. International student market, Charles Sturt University's perspective:
 - a) Attracting international students to Australia is very competitive, and Australia must compete to attract the best and brightest students. Any changes to Australia's visa system should be communicated well in advance of taking effect so that University marketing and promotional activities have time to communicate this to prospective future students.
 - b) What factors should we consider when simplifying the visa system?
 - Ensure that any changes to consider and evaluate student visas do not increase process times if there is a single student visa. Many students will apply to a range of universities in many countries, accepting their first offer. Charles Sturt would encourage a process which seeks to ensure time frames are reduced, or at least maintained, and recognises the differences across the visa class.
 - Ensure that the application fee does not increase significantly from the current \$560. To do so reduces Australia's competitiveness in a global market, where many of our competitors have less expensive application fees.

- c) What should be the key characteristics of a simplified and flexible visa system?
- Simplifying the application process with clear, standardised and objective criterion while remaining cognisant of the differences between the types of students, for example, a research student and a secondary student (grouping these types of students together may cause processing delays).
- d) Temporary visas are for specific, short-term activities only:
- Post Study Work Rights: Charles Sturt University has a strong history of producing graduates who achieve success in their chosen industries with a current graduate employment rate that is above the national average. The Temporary Graduate visa (subclass 485) is an important and attractive feature of the existing visa system. It enables Charles Sturt graduates to implement their studies in the environment in which they were taught, consolidating their studies in a professional context. If a clear delineation between visa types is adopted, Charles Sturt would advocate clarity around benefits associated with the existing study visas.
 - Charles Sturt University is a regional university and supports the communities in which we operate. This includes investing in students who can support regional communities after graduation. Charles Sturt would support a framework in post-study work rights are lengthened should employment in regional areas be prioritised by the applicants who find employment in regional areas of Australia. Please also refer our general commentary provided in paragraph three of this letter above.
 - Charles Sturt University also supports immediate implementation of the masters and doctorate by research visa system, set out in the National Innovation and Science Agenda (NISA) launched by the Commonwealth Government in November 2015, that provides a direct path to residency with a guarantee of permanent residency on graduation from a research postgraduate qualification at the AQF 9 and 10 level. Implementation of this visa reform would be a game-changer for Australia's international student market attractiveness, the future global competitiveness of Australian industry and in particular, for development of regional Australia and decentralisation of our metropolitan cities in the 21st Century digital age.
4. Other questions put forward in the Department's consultation and market papers:
- a) What requirements should underpin a migrant's eligibility for permanent residence? Should prospective migrants spend a period of time in

Australia before becoming eligible for permanent residence? What factors should be considered?

- Should we advocate that time spent studying in Australia be included in any required time-period to apply for permanent residency visas? This would ensure that Australian international education remains in a genuinely competitive proposition against the likes of Canada, New Zealand and the UK, as well as countries like Germany, Japan and China whose universities are increasingly delivering undergraduate tuition in English and the recent and quite radical migration reforms in Japan. More market research and analysis will be required to answer these questions, both by Universities Australia and Charles Sturt University for our own submission to the Department's visa reform and modernisation process.
- Should we consider whether spending time in regional Australia would be viewed with favour when applying for permanent visas? Do we continue and expand that current five bonus point arrangements for residency with regards regional Australia?
- Should we introduce a regional student visa subclass, for study and residence in regional Australia? Such a visa class would provide a major impetus to the Commonwealth regional development agenda (Regions 2030 Unlocking Opportunity statement), the Government's review of regional development and decentralisation, as well as decentralisation initiatives and several of the major elements of the Our Future Our North White Paper on Development of Northern Australia and policies focuses on Tasmanian economic growth and development.

Finally, Charles Sturt University would like to draw the Department's attention to the University's submission to the Inquiry into Regional Development and Decentralisation which is currently being undertaken by the Select Committee of Regional Development and Decentralisation of the House of Representatives of the Australian Parliament, where Charles Sturt University provides extensive commentary and input on the importance of immigration, international students and foreign skilled labour to the economic, social, cultural and environmental vibrancy of regional, rural and remote Australia.

Charles Sturt University's submission to the Department's review process will provide a range of recommendations relating to Australia's visa system and detailed in the Department's policy consultation and market consultation papers that detail the scope of the Government's proposed immigration reforms. We believe that our recommendations would strengthen Australia's visa system, particularly with regards Australia's global competitiveness in the international student market, as well as the wider benefits touched on throughout this submission.

Appendix I – Reference List

Commonwealth of Australia. (2017). *Regions 2030: Unlocking Opportunity* .

Deloitte Access Economics. (2015). *The Value of International Education to Australia*.
Australian Government.

Productivity Commission. (2015). *International Education Services*. Canberra: Commission
Research Paper.