



ASSOCIATION OF AUSTRALIAN EDUCATION REPRESENTATIVE IN INDIA

Registered under Societies Registration Act XXI 1860
Registration No.: S-31213 of 1997

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The Hon Alex Hawke MP
Minister for Immigration, Citizenship, Migrant Services and Multicultural Affairs
alex.hawke.mp@aph.gov.au

The Hon Alan Tudge MP
Minister for Education
alan.tudge.mp@aph.gov.au

Dear Ministers Hawke and Tudge

I am writing as the President of the Association of Australian Education Representatives in India (AAERI). AAERI is the peak body for education representatives working for Australian Universities that are based in the Indian sub-continent.

AAERI continues to work collaboratively with Home Affairs and DESE on issues related to international students and have been in contact with your office over the period of the pandemic. I further thank your departments for giving consideration to our submissions.

Australia has signalled a "welcome" to students from South Asia and this was further highlighted when the Prime Minister, the Hon Scott Morrison MP announced a visa fee waiver for the next 8 weeks, not only for the students but also for their dependents.

I am confident that this announcement will help return the students to Australia in time for the coming intake. However, AAERI is of the belief that this announcement does not significantly increase the attraction of Australia as a study and work opportunity when compared to similar markets. With some tweaking to the current offerings, however, there could be a competitive edge to Australia's appeal to the students considering studying overseas.

AAERI therefore submits the following recommendations for the consideration of the Australian Government:

- **Expand the list of acceptable English proficiency tests for the Student Visas.**

AAERI believes that one way to enhance Australia's appeal to international students is to widen the acceptance of alternative English Proficiency tests including Online and securely delivered tests (such as TOEFL from Home and Duolingo amongst others developed/being developed by IELTS and PTE). Post Covid, English Test providers have developed advanced proctoring software for monitoring the students taking the English language exams at home. Such integrity measures are also being used by Australian Universities to conduct their own exams where the student takes them from their own homes. There is data that the security and integrity of such tests is nearly the same as tests taken at a centre. AAERI believes that these exams are at par with the accredited exam centres and the level of English is accurately assessed.

Since 2021, there is a significant increase of interest amongst students to take these English tests i.e., Language Certificate, Duolingo and TOEFL, from home. As an organisation, AAERI and several education providers recognise these English language tests. These tests are also widely accepted internationally by Universities and for the purposes of visas, for example in the United Kingdom and New Zealand.

AAERI strongly recommends that the Department of Home Affairs expands the list of acceptable English proficiency tests for the Student Visas.

- **Extend additional post study work rights (PSW) to all students – including Bachelor students –**

An undergraduate student spends approximately 4 years in Australia and more often invests double the time, efforts and resources in Australia than a postgraduate student. AAERI has observed that undergraduate students

are young, focused and provide a huge economic support to the Australian community at large.

Recently and to make Australia attract more international students, the PSW under Subclass 485 was extended by your office for Masters by Coursework students (permanently) and it also increased it for the vocational students (temporarily). Unfortunately, the PSW rights remained unchanged for students who studied a bachelor's degree. In coming years, AAERI expects a 50% rise in the UG student market coming to Australia from the Indian sub-continent.

AAERI therefore recommends those who complete a bachelors using a pathway should be offered similar PSW rights which are currently offered to the Master's level students. Both (UG & Masters) are in undertaken in the higher education sector and they have the skills that need to be used in the workplace.

- **Make the Genuine Temporary Entrant (GTE) Criterion more objective**

It is true that all education agents seek to recruit GTE students. It is the experience of the AAERI members that the GTE requirements are subjective, and the test applied varies from one Education provider to another Education provider. As there is no consistency in the GTE requirements, large numbers students and their families are often confused and decide to drop the plan to study in Australia. For example, some Universities feel that visas application for married students or if the student has altered his course direction after Bachelors or if there is a gap in education for even 1-2 years for whatsoever reason, the Home Affairs is likely to refuse the visa and thus they avoid entertaining such student applications. Any refusal of visa goes against the University's risk assessment level. AAERI has also found discrepancies between specific fund requirements and its form; account balance maintenance period and so on.

In these challenging times, AAERI recommends that there needs to be specific GTE requirements so that the communication with the student and their families is consistent and transparent. AAERI recommends clear and transparent GTE requirements so that the process is smooth. This will help reduce visa refusals and quicken the processing. It will also reduce erroneous visa outcomes.

- **Encourage more auto-grants**

AAERI is aware that Home Affairs uses algorithms and technology to make quick decisions on applications which is encouraging. AAERI believes that there are specific parameters for auto grants and AAERI strongly recommends that visas are more readily granted on an auto grant basis. One such trigger for the auto-grants was the ability to undertake the health examination in advance of the visa lodgement and this resulted in the outcome of the checks to be available at the time of visa lodgement. This used to be the practice but for some unknown reason, the ability to undertake the health checks in advance has been disabled.

The intent is not only faster visa processing but also encouraging high quality students to opt Australia as a study destination. This, along with an objective GTE, will go a long way in improving the current processes.

- **Students travelling with spouses**

It is cultural fact and tradition that Indians often get married early. AAERI believes and recommends that married students should not be considered negatively at this time when Australia is in shortage of workers. In some ways this could be considered a discriminatory practice. We would encourage the Australian Government to consider the merits of married students being encouraged to travel with their spouse and their visa application being treated on par with other students.

AAERI remains grateful to both the Department of Home Affairs and Education, Skills and Employment for the continuing dialogue over many years.

We value the support that you provide us and thank you for your attention to the issues that AAERI have raised.



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I welcome any opportunity you have to discuss these issues with me.

Yours sincerely

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cc:

1. Hon Barry O'Farrell AO, High Commissioner in India
2. Elizabeth Kerrish, Counsellor (Immigration), CMO, Australian High Commission, Delhi
3. Mathew Johnston, Minister Counsellor (Education and Research) – South Asia
4. Brett Galt-Smith, Counsellor (Education and Research) – South Asia
5. Catherine Gallagher, Minister Commercial – SA, Head Austrade – SA
6. Monica Kennedy, Sr Trade and Investment Commissioner, Austrade
7. Phil Honeywood, IEAA
8. Catriona Jackson, Universities Australia
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10. AAERI Executives

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