



**ASSOCIATION OF  
AUSTRALIAN EDUCATION  
REPRESENTATIVE IN INDIA**

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

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**April 23, 2019**

**AAERI Petition**

**Urgent Strategic Review Requested to Reverse TAFE Australia's  
Decline in the Australian Export Education Industry Since the  
Implementation of The Knight Review in 2011**

**TAFE the Jewel of the Australian Education Industry - Treated as the  
Neglected Child**

What happens to a child who is smart, efficient, productive, cooperative and disciplined but their parents and extended family treat them consistently as a neglected child? Answer: The child's development and progress become seriously stymied! This is exactly what has happened (albeit inadvertently) to the Australian TAFE sector since the implementation of The Knight Review in 2011.

TAFE Australia is recognised as one of the most efficient and cost-effective (perhaps change to "high value") providers in the world offering multi-sector, vocational and professional education, leading to long-lasting, high-demand, internationally viable skilled occupations for Australian citizens, residents and international students alike.

However, regardless of the huge potential of TAFE Australia as a major player in the Australian export education industry and the significance of TAFE institutions to the future of the Australian skilled workforce and economy, these benefits have been overlooked for almost a decade now. In fact, there has been seemingly **no effort** made by Australian policy makers to address the serious decline of TAFE Australia within the export education industry since the release of the Knight Report in 2011, which as it turns out, has been almost exclusively focussed on providing benefits to the Australian Higher Education sector.

1

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## **The Strategic Review of the Student Visa Program, 2011, Otherwise Known as The Knight Review**

In December 2010, the Hon Michael Knight AO was appointed to conduct the first strategic review of the student visa program. The intention of the review was to examine how the student visa program could best support Australia's international education sector whilst also preserving the integrity of Australia's migration system.

The resultant [Strategic Review of the Student Visa Program 2011](#) (The Knight Review) contains 41 recommendations to enhance the quality, integrity & competitiveness of Australia's international education industry and student visa program. In their response, the [Australian Govt.](#) extended in-principle support for the recommendations set out in the review.

For the purpose of this petition, the relevant recommendations extracted from The Knight Review include:

- *Recommendation 3: Streamlined visa processing for universities;*
- *Recommendation 4: Post Study Work Rights (exclusively for higher education and research degree courses of at least 2 years in duration);*
- *Recommendation 34: That Austrade be asked to prepare a more detailed outlook document that provides effective business planning intelligence demonstrating the opportunities, for offshore provision of vocational education;*
- *Recommendation 35: That the highest quality Australian VET providers including TAFEs, be encouraged to explore offshore market opportunities;*
- *Recommendation 36: That the Australian Government, through programs such as the Export Market Development Grants Scheme and other forms of assistance, support high quality Australian vocational education providers in expanding their offshore training services.*

After the release of The Knight Review, we note the following statements published in the media, which reflect two opposing views related to the perceived impact on TAFE and private VET providers :

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Sydney Morning [Herald](#) (Oct 04, 2011) - "...There has been a 19 per cent decline in offshore visa grants for higher education . . . in the six months to April 2011," the review says. "This suggests that a serious decline in the number of commencing students is almost upon us. But so far it is vocational providers — TAFE and private colleges — that have struggled most in the downturn. There is little relief for them in the review..."

*The [Conversation](#) (Sept 22, 2011) - "...This reduction in the AL financial requirements will particularly assist a significant number of Vocational Education and Training and private education providers. Universities Australia CEO, Dr Glenn Withers described the report as a boon to the sector..."*

As it turned out, after the release of The Knight Review in June 2011, the face of the Australian export education industry changed dramatically across the world – with the greatest impact being on the VET sector and the South Asian student market, as a result. The almost exclusive focus of The Knight Review on extending the following benefits to the Higher Education sector saw student numbers for this sector dramatically increase and numbers for the TAFE and private VET sector decline significantly:

- **more simplified student visa conditions** – especially for the Higher Education sector;
- **GTE underpinned SVP scheme** that morphed into the SSVF scheme – which was skewed to benefit the Higher Education sector;
- **eVisa lodgement scheme** which resulted in faster processing and more predictable student visa assessment outcomes – which actually resulted in positive visa grant rates for the Higher Education sector and the reverse for the VET sector; and
- **the 2-year Post Study Work Visa (PSWV)** introduced exclusively for the Higher Education sector.

With due respect, the main issue created by the implementation of The Knight Review for TAFE providers, which has largely gone unnoticed and unreported and has not been addressed by Australian policy makers for over 8 years now, is the negative impact on the future of TAFE Australia once these recommendations were accepted and implemented. AAERI believes that one of the main reasons for this, was because student visa applications for VET level courses offered by TAFE institutions have been

3

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treated in the same manner as visa applications for courses offered by private VET providers. **TAFE Australia is caught between a rock and a hard place** – i.e. perceived as vastly inferior to the Higher Education sector and with TAFE specific student visa data being combined with data for the private VET sector, TAFE Australia seems to have found it impossible to extract itself and its brand from this curious position.

To emphasise this, pertinent statements and explanations related to the VET sector (*and highlighted in blue text below*) which have been extracted from The Knight Review, are as follows:

**1. VET for Profit:** The VET sector includes some highly reputable and well established businesses. It also has included – and despite the regulatory improvements made in the last few years, I believe still includes – some providers more interested in profit than in education.

AAERI believes that Govt. funded TAFE institutions and privately funded VET providers that make up the VET sector, have largely been treated and assumed ‘at par’ within The Knight Review. However, the ground reality is that the much larger, better resourced, more financially stable, publicly funded TAFE institutions (some of which are multi-sector ELICOS, VET and Higher Education providers) offer a far greater range of VET courses to meet the specific needs of their communities, regardless of the commercial viability of some of the courses on offer. Whereas, private VET providers tend to offer a limited range of more commercially viable, immigration specific VET programs almost exclusively to full-fee paying international students.

Here it is also important to note that commercially oriented and immigration focussed privately funded Higher Education providers exist along-side publicly funded Universities within the Australian export education industry. **And, regardless of their funding and business models, these privately funded Higher Education providers enjoy the same advantages as the University sector, as well.** The question that begs to be answered here is why within The Knight Review are private Higher Education providers perceived to be focused on quality education rather than profit, but TAFE and private VET providers are deemed to be mainly focused

4

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on profit making. These assumptions are grossly inappropriate and inaccurate in many cases. The rules of the game for TAFE and high quality private VET providers caught up in the midst of these assumptions are unfair and skewed to the benefit of private Higher Education providers as well as publicly funded Universities. For these reasons, **AAERI recommends that TAFE Australia be separated out from the private VET sector** into a distinct multi-sector AQF division (that actually overlays the AQF ladder) so it can be treated with the respect that it deserves within the student visa program and for DET data collection, reporting and student visa compliance monitoring purposes alike.

*Recently, the Hon Tanya Plibersek MP, Deputy Leader of the Opposition and Shadow Minister for Education and Training, stated the following in a speech given by her at the [Universities Australia Conference](#) on the Feb 28, 2019: "...We want a strong vocational education sector as well – with public TAFE back at the centre. Labor wants TAFE and Universities to be seen as two equal but complementary systems...". AAERI fully supports the intent of this important statement!*

*As per an article in [The Sydney Morning Herald](#) published on November 28, 2018, the Liberal government announced that they would launch a review of the beleaguered vocational education sector after years of scandal and business complaints over the mismatch between job-seekers and employers. In support of this petition, AAERI urges Australian Govt. policy makers associated with this long over-due review to include a review of TAFE Australia's international student visa program, as well. One of the main focusses of this review should be on the disconnect between the 18 months [Temporary Graduate visa - Graduate Work stream](#) and Australia's PR program for VET level students who hold approved qualifications that lead to skilled occupations published on the skill shortage list.*

**2. Benefits only for University Sector:** *At last count 66 non-university providers were registered with CRICOS for both higher education and VET courses. But as mentioned earlier, this process is likely to accelerate with more applications in the pipeline. If other higher education providers were to receive the same benefits*

5

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*recommended for Australian universities, it would almost certainly be the case that a large number of other VET providers would seek to reposition themselves as higher education providers. The incentive to morph from one sector to the other would be enormous. This would have profound implications for the integrity of migration controls. It is therefore essential that the recommended benefits are confined to the university sector.*

Before the Knight Review was published and implemented back in 2011, the [student numbers](#) and the export education industry circumstances were extremely different to today. In the 2009 -10 project year, the number of student visa grants for Indian Higher Education students lodged outside Australia was 3,645. In the same period, the number of student visa grants for Indian VET students lodged outside Australia was 8,023. This means that the ratio of Higher Education to VET visa grants at this time was 1 : 2.2 in favour of VET institutions in 2009 -10.

Now, in April 2019, the situation is radically different. In the 2017 -18 project year, the [number of student visa grants](#) for Indian Higher Education students lodged outside Australia was 27,189 and the number of student visa grants for Indian VET students lodged outside Australia, was 6,252. This means the ratio of Higher Education to VET visa grants has radically reversed in favour of Higher Education institutions. We believe that this radical change has largely been brought about by the implementation of the discriminatory VET sector recommendations set out in The Knight Review.

The data below which was extracted from the official [Australian Govt.data.gov.au website](#) (and which only accounts for new Indian student visas issued outside Australia) clearly reflects the vastly different Higher Education v's VET sector student numbers over the past 10 years.

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Indian Visa Grants (Offshore)	2009-10	2010-11	2011-12	2012-13	2013-14	2014-15	2015-16	2016-17	2017-18	2018-19 (to Nov18)
(Includes Universities and Private HE Providers)	3,645	2,823	5,895	8,606	19,366	20,243	19,260	22,266	27,189	13,870
VET (Includes TAFE and Private VET Providers)	8,023	1,207	1,089	486	582	1,777	5,653	2,942	6,252	4,021

Further to this, based on the following International Education data, extracted from the following [Austrade](#) website, approx 7.4% of all onshore VET enrolments and approx 15.2% of all onshore VET commencements only in 2019 have enrolled in Govt. VET providers which are largely TAFE Institutions. There is huge gap in terms of onshore Govt. provider enrolments v's private VET providers.

Sector	Provider Type	Sum of Data YTD Enrolments					Sum of Data YTD Commencements				
		2015	2016	2017	2018	2019	2015	2016	2017	2018	2019
VET	Government (Mainly TAFE Providers)	13,096	12,241	12,195	11,568	11,294	7,730	6,874	6,955	6,145	6,045
VET	Non-Government	73,666	86,367	1,01,242	1,19,042	1,40,547	19,405	23,554	26,204	28,210	33,708
<b>Grand Total</b>		<b>86,762</b>	<b>98,608</b>	<b>1,13,437</b>	<b>1,30,610</b>	<b>1,51,841</b>	<b>27,135</b>	<b>30,428</b>	<b>33,159</b>	<b>34,355</b>	<b>39,753</b>

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An important point to be highlighted here is that since student visa grant data for private VET applicants is combined with TAFE applicants, the actual number of TAFE grants cannot be determined from the data Home Affairs supplies. Hence AAERI’s recommendation that TAFE Australia be separated out into a distinct multi-sector AQF division and within the student visa program, as described above.

*3. VET lacks Integrity: That is not to say that the entire VET sector, or even the majority, lacks integrity. But with 533 registered providers offering VET courses to international students in 2010 it is far too risky to extend the benefits beyond the current arrangements. Of course for those high-quality TAFE and private providers who partner with universities there will be great opportunities.*

That the VET sector lacks integrity is a bold and inaccurate statement when taking world-renowned TAFE providers into consideration. Questions: Since the Knight Review was published, which TAFE institute suddenly failed and closed down, leaving their students stranded? Which TAFE institute offered only commercially oriented courses linked to migration? Which TAFE institute recruited unqualified students without applying their English language and academic entry requirements? Which TAFE institute have consistently offered heavily discounted tuition fee prices to onshore students as opposed to their published tuition fee prices that offshore students pay? Which TAFE institutions have aggressively sought to partner with Universities in order to offer skilled occupation friendly VET/Higher Education package programs for strictly commercial reasons rather than to improve their student’s Australian education experience and their greater access to viable skilled occupations at the end of the day? Which TAFE institution have offered international students classes made up exclusively of students who hail from a single country? We are confident that the answer to these questions would basically be none!

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On the subject of TAFE and high-quality private VET providers partnering with Universities as recommended in The Knight Review, over the past 8 years or so, many VET providers have sought to do this to take advantage of this opportunity in order to offer skilled occupation friendly VET/Higher Education package programs to their international students. However, since students who opt for the VET sector have been seen as higher-risk students and have been perceived as a risk that may impact negatively on the University's immigration Evidence Level (or risk rating) after the completion of their VET level course, most Universities have basically rejected this concept eliminating this opportunity, even for most TAFE providers to date.

AAERI is aware that even though students who have not been formally released by their initial 'recruiting institution' cannot transfer to another provider until after they have completed the first 6 months of their principal course, this opportunity is still not readily available to TAFE providers and high-quality private VET providers, due to continued reluctance on the part of the University sector.

***4. Export VET Programs to Asia: Australia is a world leader in vocational education. This is a market well worth further developing for Australia's vocational education providers within Asia.***

***But study in Australia is not within the financial reach of the overwhelming majority of potential students in Asia. There is an emerging, and potentially enormous, market for VET training within a wide range of Asian countries. In the short term many VET providers have concentrated on attracting students to Australia. But in the medium-term Australia has the opportunity not merely to attract students but to "own the space" in the fastest emerging economies in the most populous countries.***

***The following Knight Review recommendations support this notion:***

- Recommendation 34 - That Austrade be asked to prepare a more detailed outlook document that provides effective business planning intelligence demonstrating the opportunities, for offshore provision of vocational education;***

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- *Recommendation 35: That the highest quality Australian VET providers including TAFEs, be encouraged to explore offshore market opportunities;*
- *Recommendation 36 - That the Australian Government, through programs such as the Export Market Development Grants Scheme and other forms of assistance, support high quality Australian vocational education providers in expanding their offshore training services.*

In theory it's a fine and altruistic idea to set up offshore based TAFE institutions in countries with huge skills shortages such as India. However, since the Knight Review was implemented, how many profitable TAFE education institutions have been established and proliferated across India? There are many agreements and MOU's signed but few if any have developed into really successful and financially viable operations. This is largely due to lengthy Indian Govt recognition approvals, the lack of local infrastructure and international standard teachers and trainers, tuition fee price differences and the difficulties surrounding repatriation of profits, given that the conversion of Indian rupees to foreign currency is strictly controlled by the Indian Govt. When it comes to numbers, India will always seem impressive but the ground realities are different. Many 'capacity building' projects that involve upfront funding by foreign education providers (such as Australian TAFE providers) soon find that they are expected to operate them in a more 'charitable' manner, with no return on investment in sight.

However, 'Charity Begins at Home'! To ensure their ongoing survival, TAFE providers across Australia desperately need to significantly increase their onshore student numbers. They need to recover the significant financial losses that they have faced because of the serious drop in their international student numbers since the implementation of The Knight Review. AAERI believes that the best solution would be for TAFE providers to be given a 'fair go' by Australian decision makers who need to make positive adjustments to

10

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the student visa program so that TAFE institutions can rebuild their onshore student numbers and generate much needed revenue.

**5. VET linked with Migration:** The two things the VET sector most wants is a closer link between their courses and migration; and fewer barriers to entry for prospective international students. Both undoubtedly would increase student numbers. But I am not prepared to recommend either.

As already pointed out, many of The Knight Review recommendations have worked against the interests of the VET sector in Australia. The fact that the VET sector is no longer closely linked to the skilled migration program is another discriminatory factor that has impacted negatively on TAFE Australia in particular.

Since the implementation of The Knight Review in 2011, one of the main reasons for the serious decline in TAFE student numbers is that unlike the Higher Education sector, there is a disconnect between the VET sector and the current skilled migration program for VET students who seek to complete high-demand vocational, trade or professional courses. If they are lucky enough to be granted a student visa in the first place, on successful completion of their vocational, trade or professional courses, most VET level students choose to progress to a skilled occupation and PR friendly bachelor's degree at great additional expense. The reason for this is that they know as a VET level PR applicant they will find it too difficult to demonstrate the required amount of relevant work experience and meet rigorous professional body requirements before being qualified to apply for skilled migration.

It is common knowledge that there is a dire need for qualified skilled workers in many skilled occupations, especially in regional cities and towns across Australia. And yet, only a small proportion of VET level students can gain access to a Post Study Work Visa for a non-viable period of 18 months after they complete their approved 2-year VET course that leads to a seriously restricted number of skilled occupations. Therefore, most TAFE students who hold a viable vocational, trade or professional qualification are reluctant to take up this less secure option. This is to the distinct disadvantage of the TAFE providers as they find it very difficult to attract VET level students to take up their vocational, trade or professional courses for this reason.

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To resolve this disconnect and to radically improve TAFE Australia's international student numbers, AAERI recommends that the same Post Study Work Visa conditions offered to the Higher Education Sector should also be offered to TAFE students upon successful completion of an approved diploma/advanced diploma qualification – so long as they are qualified to work or train in an eligible skilled occupation and can meet all other requirements.

**AAERI Recommendations:**

1. TAFE Australia needs to be rightfully recognised by the Australian Govt and its policy makers as Australia's main 'capacity building' body, which is the backbone of Australia's vocational, technical and professional skilled workforce. And, they need to proudly support the institutions that make up TAFE Australia as an obvious study choice for technical level overseas students who are seeking international level vocational, trade or professional, career friendly qualifications that are in demand and equally valued in their home country as well as in Australia.
2. AAERI recommends that the best solution to address the above issues is for TAFE Australia to be purposely separated out from the private VET sector into a distinct multi-sector AQF division (that actually overlays the AQF ladder) so it can be treated with the respect that it deserves within the student visa program and for DET data collection, reporting and student visa compliance monitoring purposes alike. Once a stand-alone multi-sector TAFE AQF division is introduced it is more likely that Home Affairs will treat VET, undergraduate and postgraduate level courses offered by TAFE institutes within this new TAFE AQF division with the respect that they deserve.
3. AAERI believes that because the TAFE and private VET sectors have been inappropriately combined into one education sector, it is too difficult to come up with beneficial policies to meet the unique needs of these vastly different bodies. With this in mind, a significant advantage of separating TAFE Australia out from the private VET sector would be that the Australian Govt and its policy makers would

12

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<b>President:</b> Mr. Ravi Lochan Singh	<b>Vice President:</b> Mr. Bubbly Johar	<b>General Secretary:</b> Mr. C.G. Balaji	<b>Treasurer:</b> Mr. Kishore Beengi	<b>Secretary:</b> Mr. Rupesh Patel
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**Other Executive Members**

Mr. Rahul A. Gandhi Head, Visa Committee	Mr. Nishidhar Reddy Executive	Mr. Rupesh Duggal Executive	Mr. Nirmal Chawla Head, Disciplinary Committee	Mr. Prasanna Acharya Head, New Applications Committee
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**ASSOCIATION OF  
AUSTRALIAN EDUCATION  
REPRESENTATIVE IN INDIA**

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

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then be able to mount a similar strategic review of the private VET sector. One that concentrates on developing specific policies to strengthen their education services and ensure quality outcomes within this sector as well. If this were to occur, AAERI would be committed to supporting such a strategic review for the private VET sector to shore up 'Brand Australia' for the betterment of the entire export education industry.

4. AAERI recommends that the same Post Study Work Visa conditions offered to the Higher Education Sector should be offered to qualified VET sector graduates upon successful completion of a 2-year diploma/advanced diploma qualification so long as they are qualified to work or train in an eligible skilled occupation and can meet all other skilled migration requirements.

These strategic changes will not only help revive the multitude of institutions that make up TAFE Australia, but they will help thousands of international students, especially from South Asia, to undertake vocational, trade or professional courses at world class TAFE institutions across Australia. This will enable them to build their future careers whether they be in Australia, back in their home country or in a third country, once they complete their course and gain at least 2 years of relevant post-study work experience in Australia.

Prepared by:

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