

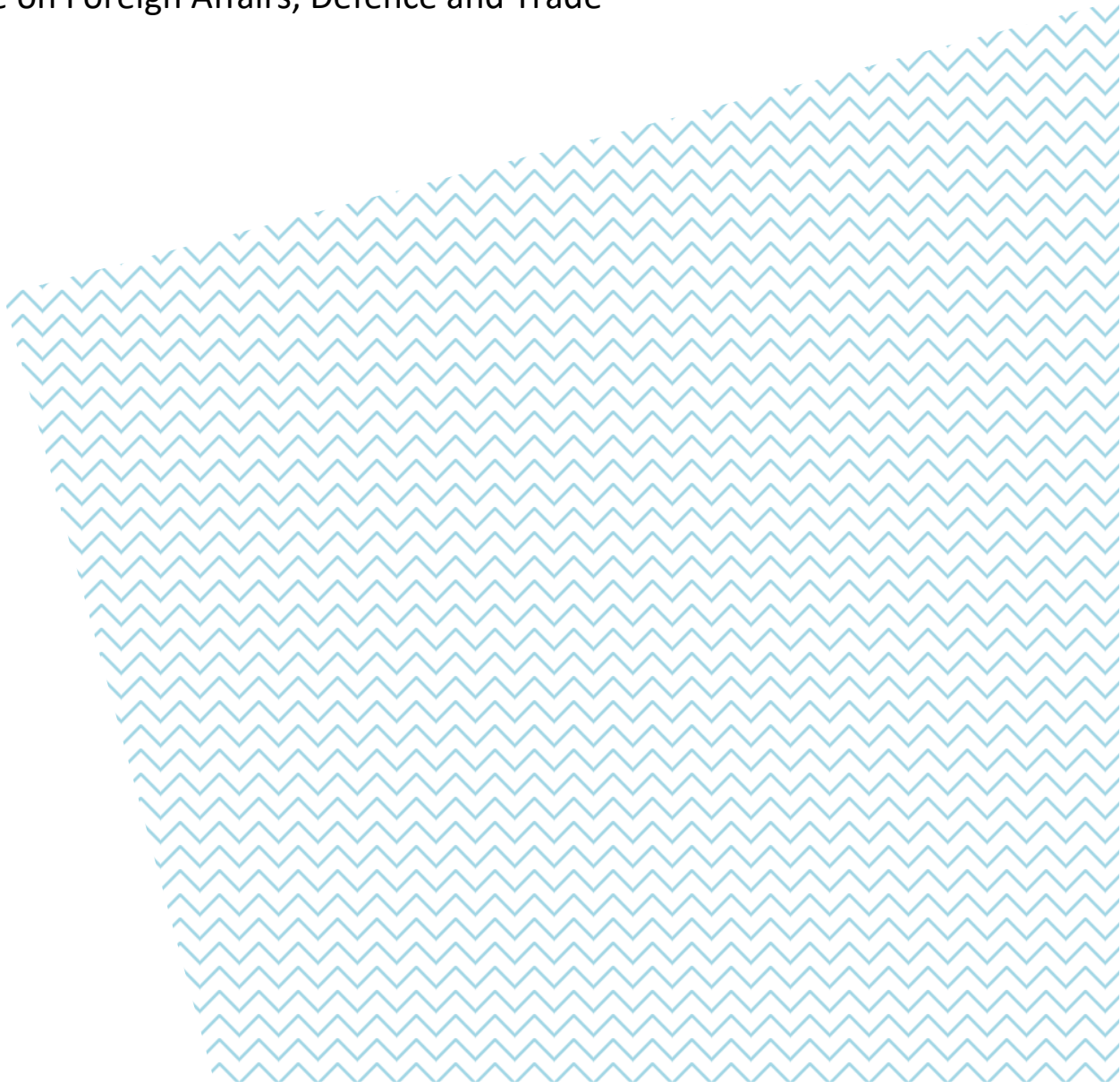


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# **Inquiry into Australia's tourism and international education sectors**

Submission to the Parliamentary Joint Standing  
Committee on Foreign Affairs, Defence and Trade

December 2022



## Executive Summary

The University of Melbourne welcomes the opportunity to contribute to the inquiry into Australia's tourism and international education sectors.

The international education sector is crucial for Australia's economy. Pre-pandemic, the sector represented our largest services export, generating more than \$40 billion. However, lockdowns and closed borders saw the sector contract, almost halving to \$22.5 billion in 2021. By the end of 2021, international student commencements had almost halved, and enrolments had dropped by a quarter compared to pre-pandemic levels. Australia's international borders have reopened but enrolments have yet to fully recover, remaining at similar levels to 2021.

Australia's reputation as an international education destination also suffered during the pandemic. This is gradually improving but there is still work to be done to ensure international students see Australia as a safe and welcoming place to study. For example, conversations about international students tend to focus on the economic benefits. These are important, however, there are broader, non-pecuniary benefits that need to be emphasised. These include the added vibrancy and diversity these students add to our campuses and society, the pedagogical benefits of an internationalised curricula, the soft power and diplomatic impacts, and the benefits for the international students themselves who receive a high-quality education.

Compounding these reputational issues is the backlog of student visa applications. The University acknowledges and applauds the Federal Government's recent work to reduce this backlog, hiring additional surge staff to respond to an unprecedented number of offshore applications. Yet, long wait times continue, posing particular issues for international PhD students whose research funding is often time limited. We encourage the Government to continue prioritising this work.

Throughout the pandemic, universities responded with creativity and innovation to ensure quality teaching and learning could continue with few interruptions. This led to a greater take-up and acceptance of online delivery. Universities should capitalise on these innovations, offering diverse modes of study and exploring opportunities for dual degree programs delivered offshore. The Federal Government could support this by altering regulatory settings to allow for a greater proportion of online delivery to onshore international students.

The Government could also strengthen the sector's resilience by supporting universities to diversify their student cohorts. Australia will need to be sophisticated, nuanced, and proactive in specifying the type of diversity we want and why we are seeking that diversity. This will require a whole-of-government approach, including greater flexibility in our student visa settings, increased resourcing for Austrade and the Department of Education's offshore network, and a greater focus on diversity outside of full-degree students, including semester abroad and student exchange.

We saw throughout the pandemic that fewer international students reported a positive student experience compared to their domestic counterparts. Going forward, it is critical that universities and governments work together to ensure international students feel welcomed and valued, with access to appropriate support mechanisms where needed. This includes co-curricular activities that promote social inclusion, public transport concessions for all university students, and greater support for international students undertaking work-integrated learning. The University would also encourage the Federal Government to consider extending post-study work rights to four years for all international students who complete a bachelors degree or above, to reduce visa complexity and improve graduates' employability.

Finally, there is significant soft diplomacy value in international education, as these people-to-people exchanges promote Australia's strategic and foreign policy objectives. Indeed, investments in international education are one of the most cost-effective forms of diplomacy. Prior to the pandemic, Australian students were highly mobile, with almost a quarter of university students undertaking international study experiences. Programs such as the New Colombo Plan continue to support these experiences. However, there are very few government scholarships or mobility programs for inbound students and there are no programs available for domestic postgraduate students. The University encourages the Federal Government to expand the New Colombo Plan to include postgraduate students and make it a two-way arrangement, offering mobility grants and scholarships for high potential international students from less-established source countries.

For further information or to discuss the submission, Professor Michael Wesley, Deputy Vice-Chancellor (International) can be contacted at [michael.wesley@unimelb.edu.au](mailto:michael.wesley@unimelb.edu.au).

# Recommendations

The University of Melbourne recommends that the Australian Government:

- Actively promote Australia as a safe, welcoming, and high-quality destination for international students, and focus messaging domestically to include the non-economic benefits the sector brings.
- Continue to prioritise reducing the backlog of visa applications, giving particular focus to processing times for time-sensitive postgraduate research visas.
- Consider enlisting an independent body such as the Australian Research Council to provide advice to the Department of Home Affairs on highly technical research proposals when considering visa applications.
- Improve data collection and sharing through PRISMS on education agent performance to assist universities to identify disreputable agents.
- Consider allowing greater flexibility for onshore international students to study more of their course online via amendments to the ESOS Act.
- Fund initial teacher education internship programs for both domestic and international students to meet international skills needs while building ties with partner countries.
- Support universities' diversification strategies by:
  - Improving the flexibility of student visa settings
  - Resourcing and tasking Austrade and the Department of Education's offshore network specifically for this purpose
  - Considering diversification outside of full-degree undergraduate students (including study abroad and exchange students).
- Work with State and Territory counterparts to ensure that all university students have access to public transport concessions, including international students.
- Provide an exemption for all work-integrated learning (including elective internship subjects) when reintroducing student visa work hour limits.
- Amend the ESOS framework to extend the visa end-date by up to 12 months for international HDR students who pause their candidature to undertake an internship.
- Work with State and Territory counterparts to incentivise local industry and business to partner with institutions and provide more work experience and internship opportunities for international students during their degrees.
- Extend post-study work rights, such that all students who complete a bachelors degree or above are eligible to work in Australia for at least four years.
- Expand the New Colombo Plan to include postgraduate students and make it a two-way arrangement, offering mobility grants and scholarships for international students from less-established source countries.
- Consider offering greater incentives for domestic students from disadvantaged backgrounds to undertake international study experiences.
- Refresh its alumni engagement strategy and reactivate its alumni activities, noting the changes brought about by the pandemic.
- Support qualifications recognition, including through the ratification of the Global Convention on the Recognition of Qualifications concerning Higher Education.

# The impact of the COVID-19 pandemic on student numbers and effective measures to attract and retain students to Australia

The pandemic has significantly impacted the international education sector. Uncertainty about borders in recent years led to weakening student demand, which will have flow-on effects in the medium term. By the end of 2021, international student commencements had almost halved, and enrolments had dropped by a quarter compared to pre-pandemic levels. Australia's international borders have reopened but enrolments have yet to fully recover. By September 2022, the higher education sector saw about 346,500 enrolments – this remains lower than the number of enrolments at the same time in 2021, 2020 and 2019. Commencements have begun to increase again (135,000 by September 2022, up from 102,000 in 2021 and 129,000 in 2020) and over 80 per cent of students are now back onshore but there is still significant work required to aid this recovery.

Re-building Australia's reputation as an international education destination is a priority. While this is improving, there is still work to be done to ensure international students see Australia as a safe and welcoming place to study. To date, the discourse around international education and international students has focused primarily on the economic benefits, including the use of post-study work rights to address our skills shortages. There is no doubt that there are large economic benefits, as Australia's largest services export. However, our messaging both domestically and internationally needs to be much more nuanced, emphasising the broader, non-pecuniary benefits of international education.

These include the benefits for the international students themselves who receive a high-quality education and the flow-on effects that benefit society, such as the added vibrancy and diversity these students add to our campuses and broader society, the pedagogical advantages of an internationalised curriculum, and the soft power and diplomatic impacts. The Government should actively promote these elements of the sector to ensure that students feel valued as a core part of Australian society.

Beyond the messaging, there is significant work required to address the issues that exist in Australia's visa system. Due to a shortage of departmental staff and a record increase in student visa applications from outside Australia, visa processing times have blown out. The University acknowledges that the Federal Government has sought to address this backlog of applications, increasing the number of staff processing applications and prioritising visas lodged outside of Australia. However, long wait times continue. In the higher education sector, 90% of visas are processed in five months. For international postgraduate research students, 90% of visas are processed in nine months. This can cause significant issues for researchers whose projects are linked to time-limited grants – by the time, the researcher has received their visa, the funding is no longer available. The University would encourage the Government to continue prioritising these visa applications. We would also encourage flexibility when students are unable to complete visa application requirements within specified time frames due to extenuating circumstances in their home country (for example, restrictions that have prevented students from attending medical appointments within 28 days).

Additionally, the University understands that some international students looking to undertake higher degrees by research (HDR) sometimes face longer processing times for their visa, due to the complex nature of their research proposals. This could be resolved through a process whereby an independent body, such as the Australian Research Council or the Australian Academy of Science, is enlisted to provide advice to the Department of Home Affairs on highly technical research proposals.

There is also a small but ongoing issue of incomplete visa applications and presentation of fraudulent documentation. This has exacerbated the backlog, through higher visa refusal rates and longer processing times. The Government has advised that providers can help reduce visa processing times by engaging with reputable education agents, noting that under the *National Code of Practice for Providers of Education and Training to Overseas Students 2018*, providers have obligations regarding managing agent relationships. However, institutions' ability to engage with reputable agents is stymied by a lack of transparent information on agent performance.

For example, while the 2017 ESOS reforms gave providers improved access to information on agent performance, access remains limited to data relating to agents with whom the relevant provider currently engages. The lack of access to performance data relating to agents engaged by other providers impedes informed decision-making and risk assessments concerning possible new third-party relationships. There is an opportunity for improved data collection

and sharing through the Provider Registration and International Student Management System (PRISMS), covering agent performance and any identified offences committed by agents. Noting commercial considerations, the University does not support making this data publicly available.

## Recommendations

**The University of Melbourne recommends that the Australian Government:**

- **Actively promote Australia as a safe, welcoming, and high-quality destination for international students, and focus messaging domestically to include the non-economic benefits the sector brings.**
- **Continue to prioritise reducing the backlog of visa applications, giving particular focus to processing times for time-sensitive postgraduate research visas.**
- **Consider enlisting an independent body such as the Australian Research Council to provide advice to the Department of Home Affairs on highly technical research proposals when considering visa applications.**
- **Improve data collection and sharing through PRISMS on education agent performance to ensure universities can identify disreputable agents.**

## Online innovations in education delivery and potential opportunities to strengthen the sector's resilience

Throughout the pandemic, universities displayed their ability to provide high-quality education both online and offshore. Transnational education (TNE) and other forms of innovative education delivery existed prior to the pandemic but these became universities' core business once Australia's borders closed. Now that borders have reopened, it will be important for Australian universities to continue diversifying their offerings to supplement the onshore delivery model.

For example, the University of Melbourne offers a Bachelor of Science (BSc) (Blended) in collaboration with exceptional Indian research and higher education institutions. Launched in 2016, the BSc (Blended) program offers the opportunity for higher education institutions in India to deliver an innovative new three-year curriculum that is designed and quality assured by the University. The course is primarily designed to prepare graduates for further study in postgraduate science and related areas, particularly internationally, but it is also well-suited to workforce participation in science-related companies that have industry-specific workplace training. The program is now taught at a range of institutions, including Savitribai Phule Pune University and the University of Madras. The University is also extending these partnerships into other fields of study and exploring dual degrees and research programs.

There may be further partnership opportunities for universities in India once the Australia-India Economic Cooperation and Trade Agreement (ECTA) comes into force on 29 December 2022. There may also be opportunities to align Australia's international education policies to support India's National Education Policy 2020 (NEP). The NEP outlines the country's aspirational agenda for universal, high quality and inclusive school education, accessible, quality higher education, and impactful research. Part of the NEP includes a new requirement that teachers must hold at least a four-year Bachelor of Education from a multi-disciplinary university by 2030. This has created enormous demand for initial teacher education.

The Federal Government could simultaneously address these teacher shortages and build ties with India by funding initial teacher education internship programs that are available to both domestic and international students. International students who complete the paid internship programs could be required to remain and work in Australia for a minimum number of years, before having the choice to return to their home country to bolster their domestic teacher workforce.

While the pandemic led to online innovations in education delivery, these forms of delivery may be constrained going forward unless changes are made to the *Education Services for Overseas Students (ESOS) Act*. During the pandemic, the tertiary education regulators TEQSA and ASQA announced that they would temporarily relax requirements in the ESOS National Code for students to attend face-to-face learning. This enabled providers to deliver their courses online while borders remained closed. However, on 19 October, the regulators advised that they expect a return to compliance with the ESOS National Code by 30 June 2023. This means that overseas students (i.e. those enrolled in onshore programs) will again only be able to complete up to one-third of their units via online or distance learning. As discussed in the University's submission to the ESOS Review in April 2022, there may be a case for permanent changes that allow greater flexibility for onshore international students to study more of their course online.

One aspect of considering opportunities to strengthen the international sector's resilience is international student diversity. The University of Melbourne recognises the risks associated with high concentrations of students from a small number of countries. Noting this, the University has developed an International Student Diversification Strategy, which prioritises countries in the Indo-Pacific with growing demand for higher education but limited domestic capacity. However, it is important that conversations around diversification are sophisticated and proactive in specifying the type of diversity we want and why we are seeking that diversity.

There is also a role for Government to play in supporting universities to diversify. For example, universities' attempts to diversify their cohorts can sometimes be hamstrung by inflexible student visa settings. For example, the Genuine Temporary Entrant (GTE) requirements may lead to some students being unfairly denied visas. It is also crucial that Austrade and the Department of Education's offshore network are sufficiently resourced and tasked with supporting this diversification. Finally, we need to consider diversification beyond just full-degree undergraduate students. The diversity of the university student cohort within Australia is significantly bolstered by inbound exchange or study abroad

students, including highly talented students from less represented countries. Yet, these students are not always captured in international student enrolment data.

## Recommendations

**The University of Melbourne recommends that the Australian Government:**

- **Consider allowing greater flexibility for onshore international students to study more of their course online via amendments to the *ESOS Act*.**
- **Fund initial teacher education internship programs for both domestic and international students to meet international skills needs while building ties with partner countries.**
- **Support universities' diversification strategies by:**
  - Improving the flexibility of student visa settings;
  - Resourcing and tasking Austrade and the Department of Education's offshore network specifically for this purpose; and
  - Considering diversification outside of full-degree undergraduate students (including study abroad and exchange students).

# Initiatives to ensure positive international student experience and support pathways to build skills and contribute to Australia's prosperity

The University of Melbourne is committed to the premise that all students should have a high-quality experience and equal access to opportunities, regardless of their mode of study. For students in Australia, a world-class student experience is dependent on the inclusion of international students into their local community, ensuring each student feels welcomed and valued, with access to appropriate support mechanisms where needed. This is partly about providing an Australian cultural experience, including through co-curricular activities, and ensuring international students have opportunities to create friendships and networks with domestic students. This is largely a role for universities themselves, in conjunction with their student clubs and societies. However, there are other ways in which the Government can improve international students' experiences in Australia, including through cost of living measures, support for work-integrated learning, and changes to post-study work rights.

## Cost of living

The rising cost of living is currently a significant issue across Australia. However, this impacts international students disproportionately as they are often in low-paid, insecure employment without the same safety nets available for citizens. This was most stark during the pandemic, when almost half of international students reported that their financial circumstances had had a negative effect on their studies in 2020 (compared to 22 per cent of domestic students). This dropped to 38 per cent in 2021 but remains higher than pre-pandemic levels.

During the pandemic, local communities came together to support international students. When international students lost their casual jobs and found themselves ineligible for schemes like JobKeeper, universities, other organisations and governments stepped into the breach. Organisations like Study Melbourne became increasingly important, providing crucial information and supports for international students. Programs such as 'Our Shout', a food voucher program run by the City of Melbourne and Queen Victoria Market, provided food vouchers to approximately 10,000 international students. This program received support from the Victorian Government and some Victorian universities, including the University of Melbourne. The Victorian Government's International Student Emergency Relief Fund also played a crucial role, providing students with one-off payments of up to \$1100.

Universities also provided their own expanded student supports. For example, the University of Melbourne offered food relief and financial assistance of up to \$7500 for students facing financial hardship due to COVID through the Emergency Student Support Fund. The University also expanded scholarships for international students, offered a one-off \$4000 grant for students returning to Australia through the Melbourne Welcome package, connected with offshore students through Study Hubs in several international cities, and offered further counselling and psychological support for students.

These programs were essential during the lockdowns when the impacts of the pandemic were most acute, but many international students continue to struggle to keep up with rising costs as inflation has outstripped wage rises. Noting the importance of cost of living as a factor for international students when choosing where to study, governments need to ensure our cities are affordable for everyone.

For example, Victoria is one of the only States or Territories in Australia, along with New South Wales, that does not provide undergraduate international students with concession fares on public transport. It is also the only jurisdiction that does not provide concession fares to any full-time postgraduate students.

In a previous survey by the Independent Tertiary Education Council Australia (ITECA, then called ACPET), 90% of international students said that the lack of discounted public transport for international students would affect their recommendations to other students in their home country to study in Sydney or Melbourne. Two-thirds of respondents said that if they knew it was not available in Sydney or Melbourne prior to arrival, they would have chosen a city where it was available.

In the Federal Government's 2021 International Student Experience Survey, transport was rated among the worst aspects of international undergraduate students' living experience. Chinese students (who make up over 40 per cent of



the sector's enrolments) rated it particularly low, with only 71 per cent reporting a positive experience, notably worse than most other aspects of their experience.

The 2022-23 Victorian Budget included a small amount of funding for an improved international Undergraduate Student Education pass (iUSEpass). However, this only entitles undergraduate international students to 50 per cent off an annual myki, representing a large upfront cost for a student. The University of Melbourne would encourage the Federal Government to work with its State and Territory counterparts to ensure all university students have access to public transport concessions, including international students.

### **Work-integrated learning**

It is crucial that all students have opportunities to access work-integrated learning (WIL), which serves as a bridge between academic study and professional life. However, international students can face additional barriers when undertaking WIL. In the 2021 Student Experience, international undergraduate students rated work experience in their field of study as the least positive aspect of their living experience in Australia, with only 71% rating it positively.

There are changes the Federal Government could make to facilitate WIL for these students. For example, while student visa holders currently have unrestricted work rights, work hour restrictions are due to return on 30 June 2023. For students undertaking internship subjects as electives, these hours will once again count towards students' visa work hour limits. The Federal Government should grant an exemption for these forms of WIL when reintroducing work hour restrictions.

Further, the ESOS Framework prevents many international higher degree by research (HDR) students from undertaking internship opportunities within their PhD or Masters programs. Visas for HDR students provide a time-based allocation for students to complete their qualification. The visa settings do not allow for students to pause their candidature (and extend the end-date of their visa) to take up an internship in industry or another external organisation. Industry-embedded internships help to facilitate knowledge-transfer and utilise the skills delivered by Australia's research training system (and these have been incentivised through recent government policies). Yet, these benefits are effectively forfeited for international students, who make up roughly 37 per cent of total HDR enrolments.<sup>1</sup> This can be addressed by extending the visa end-date by up to 12 months for international HDR students who pause their candidature to undertake an internship.

The Federal Government could also do more to encourage the supply of these WIL opportunities. The Federal Government should partner with State and Territory Governments to incentivise local industry and businesses to provide work experience and internship opportunities to international students. This would help enrich the students' educational experience in Australia, while increasing their employability once they graduate.

### **Post-study work rights**

Post-study employment opportunities are a key driver of international students' decisions to study in Australia. In the 2021 Student Experience Survey, 94% of international students rated it as either extremely important or important when choosing to study in Australia. This has increased steadily every year since 2010 when only 76% noted its importance. This is particularly significant for students from India, Nepal, Vietnam and Malaysia, who rated it as one of the most important factors in their decision. Previous studies have shown correlations between success in international student markets in Australia, Canada, New Zealand and the UK and policy decisions on post-study work.

The importance of post-study work rights was highlighted in the 2011 Knight Review, which argued that obtaining practical experience in Australia made our qualifications more valuable and led to the creation of the Temporary Graduate visa (subclass 485). However, this only allows graduates with a bachelors degree to stay on for two years, and for graduates with a masters degree to stay on for three years. Only those with doctoral degrees (i.e. 4% of international students) can stay for four years after graduation.

By allowing most international graduates to remain in Australia for just two to three years, some employers may be disincentivised from hiring them. Labour market outcomes for temporary graduates tend to be weaker than that of skilled migrants, with lower participation rates, higher unemployment, and lower rates of full-time employment. They are also more likely to be employed in lower skilled occupations. This means that despite chronic skills shortages in

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<sup>1</sup> Department of Education, Skills and Employment, Higher Education Statistics (U-Cube).

<http://highereducationstatistics.education.gov.au/>

the Australian economy, we do not benefit from the full productivity and participation of a young and well-educated cohort of graduates.

The Federal Government recognised the importance of post-study work rights when it announced at the Jobs and Skills Summit that post-study work rights for select degrees in areas of verified skills shortages will be increased for bachelors, masters and PhDs. However, Australia's visa system is already overly complex and slow to respond to emerging skills needs. The University encourages the Government to consider a simple, blanket approach, whereby all international graduates who complete a bachelors and above are eligible for at least a four-year post-study work visa. This would make Australia more competitive than Canada and New Zealand, for example, which offer three-year post-study work rights for graduates.

## Recommendations

**The University of Melbourne recommends that the Australian Government:**

- **Work with State and Territory counterparts to ensure that all university students have access to public transport concessions, including international students.**
- **Provide an exemption for all work-integrated learning (including elective internship subjects) when reintroducing student visa work hour limits.**
- **Amend the ESOS framework to extend the visa end-date by up to 12 months for international HDR students who pause their candidature to undertake an internship.**
- **Work with State and Territory counterparts to incentivise local industry and business to provide more work experience and internship opportunities for international students during their degrees.**
- **Extend post-study work rights, such that all students who complete a bachelors degree or above are eligible to work in Australia for at least four years.**

## Opportunities for international education to support strategic and foreign policy objectives

International education is crucial in supporting Australia's strategic and foreign policy objectives. There is significant soft diplomacy value in people-to-people exchanges in promoting Australia's global agenda. International students who study and stay in Australia embed deep social connections and bring a diversity of experiences, expertise and perspectives to our local communities. Those who travel back to their home nations or go on to other destinations often become valuable ambassadors for Australia through their professional and personal global networks. Indeed, international education is one of the most cost-effective forms of diplomacy available.

Australia's future prosperity and security is dependent on having a culturally capable and globally engaged workforce. This is partly achieved through participation in global learning experiences. In 2019, students from 34 universities had undertaken over 58,000 international study experiences at all levels. For domestic undergraduate students, this represented 23 per cent of the 2019 graduating cohort. This illustrates the previous high global mobility of Australian students and highlights the profoundly detrimental impact of the pandemic and closures of international borders.

The Federal Government currently offers the New Colombo Plan, however this only provides scholarships and mobility grants to Australian students to study abroad in the region. Following the cessation of the Endeavour Awards in the 2019-20 Budget, there are few scholarship or grant opportunities for high potential international students to undertake study in Australia. It also means that there are no federal government mobility programs available for domestic postgraduate students. To address this gap, the Federal Government could consider expanding the New Colombo Plan and making it a two-way arrangement, offering both short-term mobility grants and longer-term scholarships for international students from less-established source countries. This could also include extending eligibility to postgraduate students.

In expanding the New Colombo Plan, the Government could consider ways in which it could broaden participation for domestic students from disadvantaged backgrounds, who may be less likely to undertake overseas study experiences without additional financial support. This might include additional top-up payments, noting that many students would be forgoing wages while studying abroad. These experiences would enrich students' learning and enhance their employability upon graduation.

In addition to scholarship and grant opportunities, it is crucial that Australia maintains and uses its alumni networks overseas more effectively. Alumni contribute to Australia's influence and standing globally, and the Department of Foreign Affairs and Trade (DFAT) has previously highlighted alumni engagement as a public diplomacy priority. Universities engage their own alumni overseas, but this can be challenging in less-established source countries or where alumni are widely dispersed.

DFAT worked with Australian universities to develop a whole of government Australia Global Alumni Engagement Strategy 2016-2020. This included a range of actions, including the roll-out of the Australia Global Alumni website and media channels. However, these do not appear to have been updated in almost two years. The Federal Government should refresh its alumni engagement strategy and reactivate its alumni activities. The new strategy should reflect the ways in which the pandemic has fundamentally changed the international education sector and the experiences of Australia's international alumni.

Finally, there is more the Federal Government can do to support qualifications recognition. For example, the Government should ratify the Global Convention on the Recognition of Qualifications concerning Higher Education. The UNESCO Convention has the potential to promote greater student and graduate mobility, and to enable better information-sharing between countries relating to qualifications. The Convention will help to improve the recognition of Australian qualifications internationally, thereby enhancing the value and utility of those qualifications, and will provide a forum through which Australia can influence standards around recognition internationally. Further, the Convention will help Australian education providers diversify their offerings as it commits countries to recognise qualifications using different forms of delivery, including micro-credentials, joint degrees, and quality online learning. As highlighted by the Department of Education, ratifying the Convention would also boost Australia's bilateral and regional education partnerships by highlighting Australia's commitment to the delivery of high-quality education, including through innovative forms of teaching and learning.

## Recommendations

The University of Melbourne recommends that the Australian Government:

- **Expand the New Colombo Plan to include postgraduate students and make it a two-way arrangement, offering mobility grants and scholarships for international students from less-established source countries.**
- **Consider offering greater incentives for domestic students from disadvantaged backgrounds to undertake international study experiences.**
- **Refresh its alumni engagement strategy and reactivate its alumni activities, recognising the changes brought about by the pandemic.**
- **Support qualifications recognition, including through the ratification of the Global Convention on the Recognition of Qualifications concerning Higher Education.**

