



ISANA NZ International Education Assoc
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27 September,

To the Ministry of Education International Division,

ISANA NZ is writing to submit an opinion on the Export Education Levy reintroduction. Because we were first aware of the consultation on Wednesday 21 September, we have not had time to properly consult membership. This opinion, however, reflects the position of ISANA NZ leadership, which connects regularly with members via online catchup forums, webinars and in-person presentations.

Do you support the proposal to reintroduce the levy for 2023?

ISANA NZ supports *incrementally* raising the levy rate from year to year to recognise the slow rebuild of student numbers education providers are facing. We would accept that this may need to begin from 2024 and at a moderate rate to allow time for sufficient operational recovery among individual education providers, particularly among smaller institutions.

Which levy activities do you value the most?

Our position in relation to the EEL is that it typically (i.e. pre-pandemic) serves a critical function in terms of investing in the international learners themselves. We were heartened, for example, to learn that the International Student Wellbeing fund may be re-instituted. This will be an essential funding mechanism for supporting initiatives that strengthen the quality of the international learner experience, which is central to sector recovery, sustainability and innovation. A resumption of EEL funds will also support important Code administration functions and the work of the Ministry to ensure balanced policy.

The association is acutely aware that at the end of August 2022 there were 15,000 students in New Zealand with student visas compared with 110,000 in 2019. We believe the Ministry and/or ENZ needs to be ringfencing funding from the get-go to ensure sufficient investment goes into the learner experience. As a recent past Senior Policy Manager at MOE International stated, 'Everyone needs professional development, but not everyone is prepared to pay for professional development'. With the huge loss of frontline expertise and the introduction of the new Education Code of Practice, it would be negligent for decision makers to ignore specialised training for those employed in international education, but there

are early hints that some believe the sector can reinvent itself and ensure sustainability with minimal investments in skills and training.

The new International Education Strategy outlines excellent goals for enabling a sector reset. We were disappointed, however, that the 2018-2030 mid-term goal for establishing international education as a subject discipline (Goal 3, p.21) was not explicitly retained in the refreshed draft. The sector reset is thus vulnerable to a return to variable, ad-hoc practice despite the refreshed strategy. It is a trained professional, not a practitioner who falls into the sector, who is on much firmer ground to support a high quality learner experience. And without trained specialists, Code provisions will be interpreted and applied in a theory-to-practice vacuum, thus undermining the Minister's core intent of the new Education Code of Practice, at least for international/cross-border learners.

Our call earlier this year for a sector Skills and Training fund has been validated by the Australian government's recent decision to invest \$10 million in a project to identify best practice in international student engagement. Further, I am only New Zealander who has been invited onto its advisory group, and this is a nod to ISANA NZ's emphasis on investments in quality services and professional standards. Here is a clear precedent for an injection of Crown funding to support the learner experience and a severely depleted workforce in the aftermath of a pandemic. We believe this needs to be similarly actioned in Aotearoa if there is a delay in the implementation of the levy to support essential supply-side functions.

Export Education Levy Annual Report

We have no representative opinion to share on the merits of an annual report. We understand the practical implications articulated by the Ministry.

In summary, we support the EEL framework and its core functions and we wholeheartedly endorse the resumption of the ISW fund, in particular. At the same time, we realise that care will need to be taken with the timing and speed of levy rate implementation to allow education providers time to get back on their feet. The association would make applications to any re-instituted ISW fund to promote the training of a fledgling specialist profession. In order to secure a sector reset, a solid foundation for sustainable, learner-centred practice needs to be established to champion manaakitanga, whanaungatanga and Te Tiriti principles which set Aotearoa apart as a provider of a high quality education.

Sincerely,

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