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Education Services for Overseas Students Policy Team
Department of Education, Skills and Employment
Via email: esos-policyteam@dese.gov.au

29 April 2022

RE: Education Services for Overseas Students Review 2022

Engineers Australia appreciates the opportunity to provide feedback to the Department of Education, Skills, and Employment's review of the Education Services for Overseas Students (ESOS) legislative framework. Engineers Australia is the peak body for the engineering profession in Australia, constituted by Royal Charter, to advance the science and practice of engineering for the benefit of the community. As Australia's signatory to the [International Engineering Alliance](#) (IEA), Engineers Australia maintains national professional standards, benchmarked against international norms. This submission provides feedback to specific questions in the review and general information for consideration from the perspective of the engineering profession.

A review of the ESOS legislative framework is supported by Engineers Australia. Recent research shows a large cohort of migrant engineers and international graduates from Australian higher education providers find it difficult to gain employment in the engineering profession in Australia.¹ Providing quality support to international students and graduates will strengthen the local pipeline of engineers with the added benefit of them having developed local experience.

Expansion and diversification

What are the barriers in the current ESOS framework to the sector's expansion and diversification into online and offshore delivery?

Understanding the impact of online learning and its effect on verification of outcomes is critical. Currently, standard eight of the current National Code of Practice for Providers of Education and Training to Overseas Students 2018 allows only one-third of the course to be taken online by students on a student visa. Any changes to this aspect would need to be carefully considered, particularly for programs, such as engineering, which include practical/lab components providing students the opportunity to apply academic theory with practice. This helps to develop international students understanding of local standards and engineering know-how as well as English language skills.

While aspects of online learning are proven, challenges exist ensuring students gain the practical elements of their courses and local knowledge. Changes to the current framework need to consider the intangible benefits students gain from a face-to-face delivery method, including those stated above. Engineers Australia believes not all programs can be covered by the same approach and this should be considered as part of the review.

Meeting skills needs and graduate workplace readiness

What changes could be made to the ESOS framework to support providers offering a wider range of work integrated learning opportunities?

¹ Bell, M and Briggs, P, 'Engineering skills supply and demand: Discussion Paper' *Engineers Australia*, March 2022
<https://engineersaustralia.org.au/sites/default/files/2022-03/Engineers-Australia-Skills-Discussion-Paper-20220310.pdf>



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Integrated learning opportunities are an important part of an engineer's development. For a higher-education provider to have a professional engineering program accredited, they are required to provide opportunities for student engineers to engage with professional engineering practice. This can be through a range of work integrated learning opportunities (WIL), including placements.

Engineers Australia, through Engineering Education Australia, offers a Professional Year program which bridges the gap between full time study and employment and prepares participants for an Australian engineering role. It is a 12-month program developing graduates' skills and local experience and provides participants migration points upon completion. Analysis shows participants of this program achieve similar employment outcomes as domestic engineering graduates. The Professional Year program, while successful, is targeted to international graduates who are seeking migration points and requires both a heavy investment financially and in time.

For Australia to continue to be a destination of choice for international students, we need to ensure our reputation for graduate outcomes remains strong. Providing greater flexibility for international students to engage with course related WIL programs (in and ex-curricula) in addition to the maximum hours of work permitted under their visa would make these programs more accessible. Engineers Australia recommends the Commonwealth Government consider ways to support students and providers to assist in the development and implementation of programs which build the skills sought after by employers, that are shorter and less expensive, than the limited courses currently available.

General comments

Engineers Australia recommends the Department of Education, Skills and Employment consider the interrelated nature of professional accreditation on many of these areas when conducting the review. The engineering profession's program accreditation is an evidence-based evaluation process to determine if foundational engineering programs align to international benchmarks. Accreditation provides confidence that a program is designed and delivered to achieve internationally benchmarked outcomes that affords international recognition and mobility for graduates. The International Engineering Alliance has several relevant multi-lateral Accords and Agreements, and these are based on signatories (including Engineers Australia) respecting jurisdictional authority. The impact of effective 'online' offerings undertaken in any jurisdiction is yet to be fully considered. This may affect the standing of an Australian engineering qualification. In addition, some of the areas being reviewed will be requirements for accreditation, such as WIL.

Engineers Australia would appreciate the opportunity to continue this discussion and provide further input to the review as required. If this would be of benefit, please contact Michael Bell, Policy Advisor at mbell@engineersaustralia.org.au or on +61 8 6214 6321.

Yours sincerely,

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