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Building the evidence base for cross- border work integrated learning models: The case of Australia and India

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Acronyms

ACEN	Australian Collaborative Education Network
ACSPSB	Australian Computing Society Professional Standards Board
AICTE	All India Council for Technical Education
AiGroup	Australian Industry Group
AISC	Australian Industry and Skills Committee
AMSI	Australian Mathematical Sciences Institute
ANMAC	Australian Nursing & Midwifery Accreditation Council
AQF	Australian Qualification Framework
BDS	Bachelor of Dental Surgery
CRICOS	Commonwealth Register of Institutions and Courses for Overseas Students
CSR	Corporate Social Responsibility
Cth	Commonwealth
DESE	Department of Education, Skills and Employment
DFAT	Department of Foreign Affairs and Trade
EFTSL	Effective Full Time Student Load
ELICOS	English Language Intensive Courses for Overseas Students
ESOS	Education Services for Overseas Students Act
FICCI	Federation of Indian Chambers of Commerce and Industry
FRRO	Foreign Regional Registration Office
FWA	Fair Work Act
Go8	Group of Eight
HECI	Higher Education Commission of India
HEI	Higher Education Institution
ICT	Information Communication Technology
INR	Indian Rupee
IoT	Internet of Things
IRU	Innovative Research Universities
ITI	Industrial Training Institute
MHRD	Ministry of Human Resource Development
MOE	Ministry of Education
MOOC	Massive Open Online Courses
MOU	Memorandum of Understanding
NCP	New Colombo Plan
NCVER	National Centre for Vocational Education Research
NEP	National Education Policy
NESB	Non English Speaking Background
NGO	Non-Government Organisation
NIEPA	National Institute of Educational Planning and Administration
NMBA	Nursing and Midwifery Board of Australia
NPILF	National Priorities and Industry Linkage Fund
NSDC	National Skill Development Corporation
NUHEP	Non-University Higher Education Provider
PhD	Doctor of Philosophy
Q&A	Question and Answer
QILT	Quality Indicators for Learning and Teaching
RTO	Registered Training Organisation
SAIEP	Study Australia Industry Experience Program
SDG	Sustainable Development Goal
SME	Small and Medium Enterprises
TAFE	Technical and Further Education
TDA	TAFE Directors Australia
TEQSA	Tertiary Education Quality and Standards Agency
UGC	University Grants Commission
VET	Vocational Education and Training
WEI	Work Experience in Industry
WINTA	Women In Non-Traditional Areas
WIL	Work Integrated Learning

CHAPTER 1: INTRODUCTION

Introduction to this report

This report sets out the evidence base for the development of cross-border work integrated learning (WIL) models to increase Australia-India WIL engagement. It elaborates key findings and analysis summarised in the accompanying report, *Opportunities to Increase Australia-India WIL Engagement: Key Findings and Analysis* (Freeman & Barker, 2022).

This report presents the findings of research commissioned by the Australian Government Department of Education and prepared by the Australia India Institute under the project, *Opportunities for Australia to Partner with Industry in India*.

The project aimed to identify and analyse Australian and Indian higher education and vocational education and training (VET) WIL opportunities, including governing policy and legislative frameworks, participation levels, good practices and barriers. Informed by these findings, the project developed four models to encourage domestic and international students enrolled with Australia's VET and higher education institutions to engage with Indian host organisations for broadly defined WIL activities.

Key drivers for Australia-India engagement

Interest in increasing Australia-India engagement reflects four key drivers.

First, there is longstanding interest in increasing industry-education partnerships across the education, training, research, and innovation systems to benefit industry, education, and the economy. This is consistent with the Australian Government's 2015 National Innovation and Science Agenda which encourages research-industry collaboration.

Second, there is growing interest in industry-based learning, with work-based learning long contributing to apprenticeships and traineeships in the VET sector, and with WIL more recently recognised as integral to higher education at the undergraduate and postgraduate levels. Sectoral support for increased WIL is reflected in the 2015 National Strategy on Work Integrated Learning in University Education (National Strategy) by Universities Australia, the Australian Chamber of Commerce and Industry, the Australian Industry Group (Ai Group), the Business Council of Australia, and the Australian Collaborative Education Network (ACEN). Consistent with this strategy, the new National Priorities and Industry Linkage Fund (NPILF) (which is part of the Australian Government's Job-ready Graduates Package of reforms) introduces performance-based funding obligations from 2022 that encourage universities to report engagement with industry. One of the fund's three priorities includes increasing "the number of internships, practicums, and other innovative approaches to work integrated learning" (Department of Education, Skills and Employment [DESE], 2021a, para. 3).

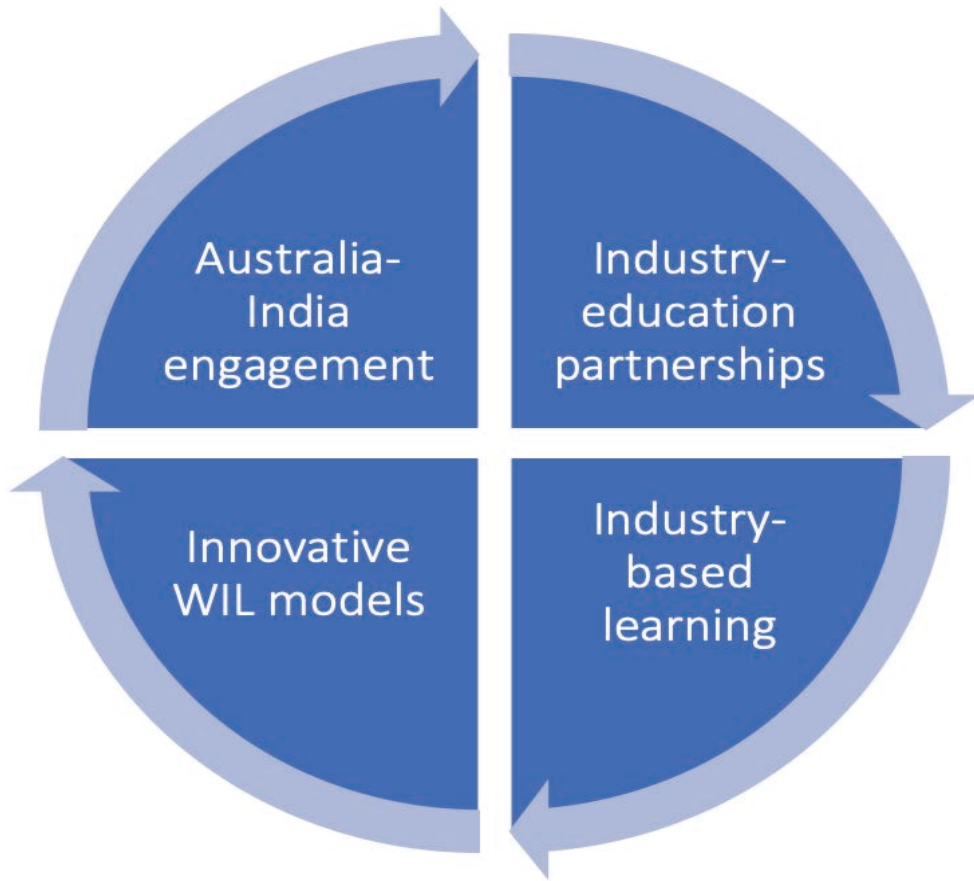
Commitment to increasing international student participation in WIL is reflected in the 2019 VET International Engagement Strategy 2025. It is also consistent with Austrade's Innovation in Employability statement which is supportive of students gaining industry experience and experiential learning. Further, the Australian Government's Australian Strategy for International Education 2021-2030 acknowledges the importance of WIL for international students, stating that it "provides students with practical experience relevant to their course of study ... and prepares students with the skills required to participate in the global workforce following their studies" (2021, p. 12).

Third, there is growing interest in innovative WIL models, including hackathons, competitions, incubators/start-ups, embedded industry certifications, offshore and online WIL, and WIL for higher degree by research students. These innovations recognise the increasing emphasis on 'employability' and address the growing competition for placements by providing alternative WIL experiences. They also reflect increasing opportunities afforded by technology advances and transformations in the labour market, continued interest by students in international work experiences, and the need at times to accommodate international and domestic mobility restrictions. The Australian Strategy prioritises international education mobility, while reviews of Australia's research training system (Watt, 2015; McGagh et al., 2016) have recommended increasing WIL opportunities for PhD students. In 2021, the Australian Government's Research Training Program introduced incentives for universities to arrange 3-month internships for PhD students.

Fourth, there is growing interest in Australia-India engagement, reflecting the large number of Indian diaspora members in Australia, growth in Australian companies' footprint in India, and broader strategic engagement between our two countries. This commitment is embodied in the 2020 Comprehensive Strategic Partnership between Australia and India and the 2022 Australia-India Economic Cooperation and Trade Agreement. It is reflected in the 2022 update to the Varghese report, An India Economic Strategy to 2035 and, on India's side, in the Confederation of Indian Industry Australia Economic Strategy Report released in 2020.

The commitment to engagement with India in education is recorded in the 2019 India Reference Group's report to the Council for International Education, Positioning for Deeper Engagement: A Plan of Action in India. It is also embodied in the Australian Strategy for International Education 2021-2030, which states that "Australia will continue to cultivate strong relationships with key partner countries, including India and China, as they remain valued partners in international education" (2021, p. 6). This strategy supports "outbound mobility [for students], for example through study, work placements and cultural or sporting exchanges" (2021, p. 17).

This report brings these elements together. It focusses on opportunities for Australian VET registered training organisations (RTOs) (referred to hereafter as VET providers) and higher education institutions to partner with Indian host organisations through WIL to benefit students, industry, and both our countries.



Structure of the report

After some preliminaries in Chapter 1 detailing the project's method, definitions and varied types of WIL, Chapter 2 examines participation levels, identifies Australian organisations with some history of operating in India, describes Australia's regulatory framework, and broadly identifies key features of WIL.

Chapter 3 charts internships in India by examining participation levels and providing some examples of host organisations offering internships. It describes India's regulatory framework for internships, and broadly details key features of internships. Together, Chapters 3 and 4 inform the development of Australia-India WIL models.

These models are presented in Chapter 4, which commences with an examination of barriers to students enrolled in Australia seeking WIL opportunities in India. It discusses good practices in WIL, generally, and more specifically with respect to Australia-India offshore WIL that emerged from this study. At least some of these good practices will be relevant to cross-border WIL opportunities with other countries.

Chapter 4 concludes by presenting four Australia-India WIL models to increase opportunities for Australia-India WIL engagement, as follows:

1. Extracurricular activities with Indian peers;
2. Online WIL with Indian hosts in Australia or India;
3. Onshore placement-based WIL with Indian hosts in Australia;
4. Offshore placement-based WIL in India.

METHOD AND DEFINITIONS

The project required a literature review, document analysis, interviews and focus groups, as well as a survey. In addition to primary data derived from these methods, the report draws on secondary data regarding higher education and VET student participation, Australian organisations that have previously operated in India, and intern testimonials.

First, the project undertook a brief literature review to extract insights from scholarly research regarding WIL, global mobility and international education. Particular attention was given to WIL key features, barriers, strategies, support services and recognition.

Second, the project undertook descriptive research involving an analysis of institutional policy documents. These documents were sourced from publicly available websites from 20 Australian universities (from all states and territories, and all university groupings)¹, nine non-university higher education providers (NUHEPs) (including those with the largest number of international students, and those with the largest number of Indian students)² and six VET providers (including those with the largest number of international students having publicly available policies)³. An illustrative extract is provided at Appendix 1. Particular attention was given in the document analysis to legislative frameworks and agreements, key features and strategies related to offshore WIL and innovative WIL models.

Third, as limited literature was identified regarding offshore WIL, Australia-India WIL engagement, and internships in India, the project involved interviews and focus groups. Fifteen interviews were conducted with 17 interviewees (nine from Australian organisations, and eight from Indian organisations), and five focus groups. These focus groups involved 33 participants including Deputy Vice Chancellors (International), faculty members and professional staff involved with WIL and employability at 19 Australian universities, two NUHEPs and three TAFE institutes. Three representative organisations participated including the Group of Eight (Go8), Innovative Research Universities (IRU) and TAFE Directors Australia (TDA) (see Appendix 2). Particular attention was given to barriers, legislative frameworks governing offshore WIL, and strategies related to offshore WIL and innovative WIL models. This fieldwork was essential given the rapidly changing labour market, 'work' and WIL landscape arising from the COVID-19 pandemic.

Fourth, the project involved a survey of Australian organisations that have operated in India at some stage, identified by the Department of Foreign Affairs and Trade (DFAT). The survey examined key features, legislation and agreements, participation, recognition, barriers, and opportunities. Invitations were sent to 91 Australian organisations, and two responses were received, representing a 3% response rate. This low response rate reflected communication challenges associated with the COVID-19 pandemic, including office closures, and highlighted the importance of building people-to-people connections to increase Australia-India engagement.

1. This includes universities in Queensland (Griffith University, University of Southern Queensland, University of Queensland, University of the Sunshine Coast), New South Wales (University of Newcastle, University of New England, University of New South Wales, University of Wollongong), Victoria (Deakin University, Monash University, RMIT University), Australian Capital Territory (University of Canberra), South Australia (Flinders University, University of Adelaide, University of South Australia), Western Australia (Curtin University, Murdoch University, University of Western Australia), Northern Territory (Charles Darwin University) and Tasmania (University of Tasmania).

2. This includes Holmes Institute, Kaplan Business School, Kings Own Institute, Melbourne Institute of Technology, Monash College, UTS College, SP Jain School of Global Management, Universal Business School Sydney, and Victorian Institute of Technology.

3. This includes TAFE NSW, Chisolm Institute, TAFE Queensland, Melbourne Polytechnic, Box Hill Institute and English Unlimited.

The project involved an analysis of testimonials from nine Victorian university students that completed offshore WIL in India under the Australia India Institute's Victoria India Internship Program, sponsored by the Victorian Government over the period 2017-2019. These nine students (4 domestic/5 international; 2 bachelor/7 master's coursework) completed 6–12-week internships with five Indian organisations in Delhi and Mumbai.

Finally, the project involved an analysis of secondary datasets including Australian Government data regarding student participation, New Colombo Plan Mobility Program data, and Work Experience in Industry (WEI) indicator data.

Defining industry and WIL for this project

For the purposes of this report, 'industry' is broadly defined as individual employers, peak industry bodies, industry councils appointed by government, unions, professional associations (Siekmann & Circelli, 2021), government departments/instrumentalities and non-profit organisations. The term industry is used interchangeably in this report with the broader term, 'host organisation'.

Different terms are used to denote WIL in the scholarly literature; at times interchangeably, and at other times, elaborating distinctions. In the VET sector, the terms 'workplace-based delivery', 'work-based learning' and 'on-the-job training' are commonly used. The National Centre for Vocational Education Research (NCVER) defines 'workplace-based delivery' as any "training activity conducted in the workplace whether it is conducted by the training organisation or the employer; for example, industrial/work experience, field placement, fully on-the-job training or structured workplace training delivered at a place of employment" (2021a, p. 68). In Australia, the term WIL is commonly used in the higher education sector, while in India, the terms 'internship' and 'on-the-job training' are commonly used.

For the purposes of this report's discussions regarding the Australian system, WIL is considered to encompass activities in both VET and higher education. The report adopts Patrick et al.'s (2008) broad definition where WIL is "an umbrella term for a range of approaches and strategies that integrate theory with the practice of work within a purposefully defined curriculum" (p. iv)⁴.

In discussing WIL in India, this report adopts the narrower term 'internships' (and occasionally, 'on-the-job training') to examine offshore opportunities, reflecting advice from interviewees.

In discussing opportunities for Australia-India engagement involving WIL, the term 'Australia-India WIL' is introduced. This term encompasses any WIL activity that involves a higher education or VET student enrolled with an Australian institution engaging:

1. with an Indian host organisation (i.e., online, or in person in Australia or India);

4. The report acknowledges that the definition of WIL adopted under the NPILF includes the following criteria: "1. Integrated theory with the practice of work; 2. Engagement with industry and community partners (industry is inclusive of business, government and the community sector whereby NGOs and not for profit organisations are suitable for a WIL experience); 3. Planned, authentic activities; 4. Purposeful links to curriculum and specifically designed assessment" (DESE, 2021b, p. 20).

2. with an Australian host organisation operating in India (i.e., online, or in person in India);
3. in a placement-based WIL activity undertaken in India (i.e., with an Indian, Australian, or multi-national host organisation); or
4. in a WIL activity undertaken with an Indian peer (e.g., an Australian, Indian, or other international extra-curricular activity).

THE VARIED TYPES OF WIL

VET providers and higher education institutions have long histories of integrating theory with the practice of work. Over time, they have developed a large range of WIL activities catering for different student and industry needs. These activities accommodate extensive regulatory requirements, reflect supply/demand tensions and technology advances, and respond to various barriers. The following section selectively presents rich extracts from scholarly literature to illustrate this diversity and extensive expertise as a basis from which to explore opportunities for increased Australia-India WIL engagement and develop Australia-India WIL models.

Categorisation of WIL

Practitioners and scholars have categorised the various types of WIL in different ways, for different purposes. It is important in developing Australia-India WIL models to appreciate that the diversity that already exists will influence the shape of opportunities available to students going forward.

Universities Australia adopted four categories – placements, projects, fieldwork, and simulations – to collect and report student participation in higher education WIL. These categories are:

1. *Placements* - where students spend time in a workplace, such as an internship;
2. *Projects* - an activity designed with and for employers, such as client-assigned projects;
3. *Fieldwork* - learning activities that occur off campus and in person, such as archaeological excavation or environmental monitoring; and
4. *Simulations* - where a student experiences all the attributes of a placement or workplace task in a university setting, such as a moot court. (2019, p. 6, emphasis added)

Kaider et al. (2017) categorised different types of WIL according to the level of involvement of industry, differentiating learning that occurs without industry involvement, WIL activities that occur with industry involvement, and WIL placement activities that occur within host organisations (Table 1).

Table 1: Broadly Defined WIL Activities Involving Authentic Learning

Learning activities without industry involvement	WIL activities with industry involvement	WIL placement activities within host organisations
<ul style="list-style-type: none"> - Simple simulations (online or live) - Case studies - Studios - Authentic simulations - Role plays - Career development learning - Workplace checklist - Virtual workplace or work practice observation - Job shadowing - Observation - Film/video 	<ul style="list-style-type: none"> - Complex simulated online or face-to-face workplace environments - Studios or practice clinics - Laboratory days - Projects for organisations - Problem-based learning with or within organisations - Community-based projects - Capstone units that provide workplace projects - Workplace audits, inspections - Job shadowing - Field trips - Q&A with industry - Input or feedback from industry - Mentoring by industry 	<p>Work placements of various types can take place in any year or frequency; for varying lengths of time; and for varying intensities and complexities, and include:</p> <ul style="list-style-type: none"> - Internships, practicums, co-op years, clinical placements, industry-based learning - Work based learning - Industry-based (or community-based) projects. Includes industry supervision and feedback. - Service learning where students undertake voluntary work in the not-for-profit sector.

Source: Adapted from Kaider et al., 2017.

Recently, more innovative types of WIL have been identified, at least in part reflecting the need to address growing competition for placement-based WIL. Kay et al. (2018) discerned innovative types of broadly defined WIL: micro-placements, online projects or placements, hackathons/competitions and events, incubators/start-ups and consulting (Table 2).

Table 2: Innovative WIL Activities

Model	Description
Micro-placements	Micro-placements typically involve short periods in the workplace ranging from two to ten days where students work individually or in teams on highly focused projects. Micro-placements occur in a diverse range of sectors, usually in small to medium companies and start-ups.
Online projects or placements	Online projects or placements involve students and industry working online and may be geographically dispersed. Students communicate via a variety of digital platforms and technologies which may not include any face-to-face interaction.
Hackathons/competitions and events	Events typically involve students working in teams on one-off intensive activities for and/or with industry partners or with university-based activities. Universities commonly partner with external events, hackathons, festivals, or competitions to provide students with industry or community engaged experiences. In some cases, this engagement can involve multidisciplinary teams of students. Hackathons are specific events in which a range of stakeholder's team up to create projects, solve problems, and develop pitches or software over a short period of time.
Incubators/start-ups	An incubator is a workspace that provides support for start-ups including mentoring, information, networks, office space and resources for the early-stage development of new business ventures. WIL students can be placed in incubators to support ventures. A start-up is an entrepreneurial venture which is typically a young, small, and newly emerged business that aims to create a new product, process, or service to meet a need that is not currently being offered elsewhere in the market.
Consulting	Consulting involves students (individually or in teams) providing consultancy services and information to others, including other students, industry partners and community organisations. Consulting activities are facilitated through the university.

Source: Kay et al., 2018, p. 13.

To some extent, these different WIL types reflect diverse drivers for particular WIL activities, which Cooper et al. (2010) identify as follows:

- the employability of graduates, often codified as work-ready graduates;
- to provide opportunities for students' civic engagement and service learning;
- response to, or driven by, a need to generate student interest;
- requirements imposed by professional/vocational registration/certification or professional statutory requirements;
- to build on students' awareness of potential careers and career development;
- to develop students' dispositions with regard to global citizenship;
- to increase students' workplace literacy (educational);
- to enable and enhance knowledge generation and transformation (generic educational);
- personal development through enhancement of students' capacity for communication, negotiation, empathy and self-awareness;
- response to consumer agency;
- to enhance individual universities' competitiveness and marketability. (pp. 8-9)

The draft TEQSA Compliance Guide: Work Integrated Learning acknowledges this established diversity and recent developments, stating that WIL may include:

- professional workplace placements (also known as internships, clinical placements, fieldwork, practicums) whether local, interstate, or international,
- online or virtual WIL (e.g., telehealth) with real clients or industry input,
- industry-partnered projects in the classroom (e.g., hackathons, incubators/start-ups) that involve industry, community, or professional partners,
- a simulated work environment with industry input, consultation, or assessment, or activities in other contexts involving industry or community partners. (2021, p. 1)

Changing conceptions of WIL in response to a global health emergency

Since early 2020, conceptions of WIL changed globally to accommodate restrictions imposed during COVID-times, and these shifts can be expected to reshape the various ways some domestic and cross-border WIL opportunities are configured going forward. For example, in the VET sector, the Australian Industry and Skills Committee (AISC) Emergency Response Sub-Committee encouraged flexibilities in some training packages to accommodate simulated workplace environments for delivery and assessment. They subsequently published guiding principles to support VET providers experiencing difficulties accessing work placements as a result of movement restrictions (see AISC, 2021). In the higher education sector, universities shifted to online placements for many courses (Prytz, 2021), amplifying the shift to online WIL that had occurred over the last decade (see Kaider et al., 2021a; 2021b; 2021c).

More broadly, VET providers and higher education institutions' longstanding experience in diverse types of WIL have necessarily evolved as demand and competition for placement-based WIL has grown, and pedagogies have changed. New technologies have encouraged further innovations, including online WIL, simulations, and global interactions. New ways of working (including the 'gig' economy, and 'microwork'⁵) also influence the type of WIL opportunities available to higher education and VET students.

Recent studies suggest that further changes will occur as virtual and augmented reality, human-robot interaction and artificial intelligence are increasingly deployed and transform learning, WIL and the world of work (see Valentine et al., 2021; Handoko et al., 2020).

The scholarly literature highlights the enduring distinction between placement-based WIL (e.g., placements, fieldwork, internships, service learning/volunteering) and non-placement-based WIL (e.g., case studies, projects, Q&A with industry), as well as the relationship between learning, entrepreneurship, and employment illustrated by WIL activities emphasising employability skill development and encouraging start-ups. The different approaches seek to embrace industry-education partnerships for the benefit of students, graduates, and host organisations. Technology advances, widely diffused and amplified by necessity, have blurred some distinctions with much learning now regularly occurring online and through simulation, and much 'work' now occurring virtually. This transformed environment influences the shape of emerging Australia-India WIL models for those interested in Australia-India WIL engagement, as well as cross-border WIL activities involving host organisations located in other countries of interest.

5. As an example of 'micro-work', the Forage platform invites students to participate in "bite-sized 5-6 hour virtual work experience programs" (see Forage, n.d.).

CHAPTER 2: CHARTING WIL IN AUSTRALIA

Introduction

This section further extends the evidence base regarding WIL in Australia to inform the development of Australia-India WIL models. These models are based on an understanding of participation levels, Australian organisations operating in India, Australia's policy, legislative and regulatory framework, and key features established by institutions. It is these very Australia-centric parameters that shape the opportunities students enrolled with Australian institutions have available to them for cross-border WIL engagement.

PARTICIPATION

This section draws on several secondary datasets⁶ to illustrate various aspects of student WIL activity noting that, as with other studies (Edwards et al., 2015) quantifying participation is problematic as there is no annual, centralised collection of Australian higher education WIL data for all universities and NUHEPs. Such a collection could inform policy decision making regarding WIL. However, ACEN reports analysing data collected from items in the Graduate Outcomes Survey are indicative of university graduate participation in WIL, importantly, including offshore WIL.

Participation in higher education and VET: All domestic and international students

Australia's higher education system grew considerably in recent years, with the number of domestic and international students reaching 1.6 million in 2019 (DESE, 2020b). In part this reflected growth in domestic student participation; however, the major contribution occurred through increased international student participation. The international higher education sector grew from 249,356 students in 2014 to 440,667 students in 2019.⁷ Nearly one fifth (17%; 73,517) of these students studied with NUHEPs.

During this period from 2014 to 2019, Indian higher education student participation also grew, from 26,236 to 90,240, with nearly one quarter (23%; 21,060) studying with NUHEPs. Prior to the COVID-19 pandemic, few Indian students enrolled externally or as multi-modal students (2,904 effective full time student load [EFTSL] in 2019) (DESE, personal communication, June 4, 2021).

Similarly, Australia's VET system grew during this period, with the number of students enrolled in nationally recognised VET increasing from 3.85 million in 2015 to 4.20 million by 2019 (DESE, personal communication, July 23, 2021). In 2019, this included 2.1 million students enrolled in nationally recognised programs and 2.6 million in subjects not

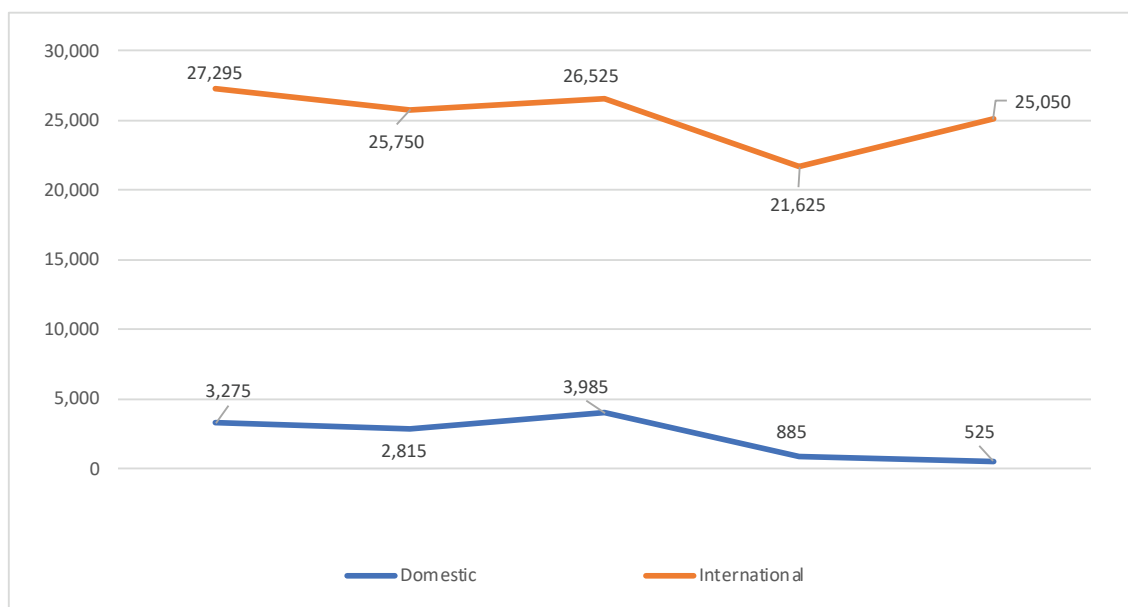
6. In relation to higher education students, this includes 'WIL activity' data collected by Universities Australia for 2017 (see Universities Australia, 2019), 'work experience in industry' data collected by the Australian Government, international student data received from the Australian Government, data commissioned by ACEN from the Graduate Outcomes Survey, data from the APA.Intern program, as well as Department of Home Affairs (DHA) student visa data, and New Colombo Plan (NCP) mobility data. In relation to VET students this includes National VET Provider Collection data collected by NCVET.

7. These figures relate to international students studying on a student visa.

delivered as part of a nationally recognised program (NCVER, 2021b). Most onshore VET students studied with private training providers (72%) and TAFE institutes (18%), while most offshore VET students studied with TAFE institutes (78%) and private training providers (19%) in 2019.

The number of domestic and international VET students studying offshore in the period 2015-2019 fluctuated (Figure 1). This included a small number of students studying offshore whose country of birth is India (2014: 85; 2019: 200) (DESE, personal communication, July 23, 2021). Many if not all these students would be classified as ‘transnational’ (rather than offshore online). In terms of offshore WIL, focus group participants advised that few VET students participated in offshore WIL (globally), other than in niche industry sectors (e.g., fashion, textiles, and embroidery in India). Rather, VET focus groups advised, “the study tour is ... the [most relevant] kind of model for any student in VET travelling” outside Australia.

Figure 1: Offshore VET Students, 2015 to 2019



Source: DESE, personal communication, July 23, 2021.

Domestically, the VET sector is increasingly internationalised, with the number of international VET students growing from 149,452 in 2014 to 281,337 in 2019 (5%).⁸ As with the higher education system, Indian VET student participation grew, from 27,892 in 2014 to 44,525 in 2019 (DESE, personal communications, June 4 and July 23, 2021).

With the disruption arising from the COVID-19 pandemic, the number of international higher education students decreased (to 418,168), while the number of international VET students increased (to 307,295) in 2020. Similarly, the number of Indian higher education students decreased (to 79,410) and the number of Indian VET students increased (to 64,495). This inter-sectoral mobility may reflect Indian student preferences at this time for lower cost courses.

8. This includes international students studying on a student visa.

COVID times also saw the number of Indian students located outside Australia increase, with 21% of all enrolled Indian student visa holders studying offshore online in June 2021 (albeit, much lower than China's 61%). This includes students enrolled in school, VET, higher education, English Language Intensive Courses for Overseas Students (ELICOS) and non-award programs. Most of these Indian students were enrolled with Australian higher education institutions, as the overall proportion of VET student visa holders offshore at that time was low (10%) (DESE, personal communications, June 4 and July 23, 2021).

Participation of higher education students in WIL

A national audit of WIL, undertaken by Universities Australia (2019), provides a snapshot of university-student participation in 2017 (excluding NUHEPs from the sample). Information regarding offshore WIL in this (and other) reports is negligible.

Universities Australia (2019) found that 451,263 domestic and international university students participated in at least one WIL experience in 2017, with a total of 555,403 WIL experiences reported (i.e., 104,140 students participated in more than one WIL experience). This represented over a third (37%) of all university students in 2017, revealing that a majority (nearly two thirds) do not engage in WIL.

University students were more likely to participate in placements (43%) and projects (23%) than simulation (13%), fieldwork (10%) or other experiences (11%) (such as volunteering, live performances, mentoring and case-based learning). Despite placements dominating WIL experiences, Universities Australia reports a shortage of placements for health students. As no data is available on the length of WIL experiences (i.e., hours, weeks), it is not possible to assess overall load across the system from the Universities Australia audit.

Universities Australia (2019) also reported that overall participation by domestic and international students was comparable (37-38%), as was participation by domestic and international undergraduate and post-graduate coursework students. Approximately 30% of Indian international students enrolled with Australian universities in 2017 participated in WIL. This was lower than some other cohorts of international students, reflecting enrolment in programs less likely to require WIL (e.g., management and commerce).

Finally, Universities Australia (2019) reported that WIL participation, generally, varies by discipline, with university students enrolled in health (58%), agriculture, environmental and related studies (57%), education (54%) and architecture and building (44%) recording the highest levels. High levels of participation in health, education and architecture in large part reflects the influence of professional association requirements. Lower levels of participation were reported for creative arts (38%), engineering and related technologies (35%), information technology (32%), natural and physical sciences (27%), management and commerce (25%), and society and culture (21%).

Some of these WIL experiences are delivered offshore. While Universities Australia

(2019) did not report the number or proportion of students undertaking offshore WIL, they noted that universities provide students with international WIL experiences with major organisations at the international level, such as banking corporations, technology companies, and consulting firms. Other global WIL partners noted by Universities Australia in their report include international NGOs, not-for-profits and charities, international governments (embassies), international start-ups, multinationals, and global industry partners.

New Colombo Plan

Our analysis of NCP Mobility Program data revealed that, for 2021, 25 Australian universities secured NCP funding of approximately \$3.5 million supporting some 1,000 India-bound students (for offshore and/or online WIL, short term mobility, study tours and other immersive activities).⁹ At least 200 were undertaking internships, placements, practicums, and WIL. Disciplinary focuses were diverse, spanning regulated professions (health, education, architecture, engineering, law), information technology, future cities, sustainable development, and other humanities and social sciences (business, politics, human rights, citizenship, gender, media). Some student grants focused more generally on entrepreneurship. Two universities, Western Sydney University (256 student grants) and the University of New South Wales (188 student grants) together accounted for over 40% of these India-oriented scholarships (DFAT, 2021).

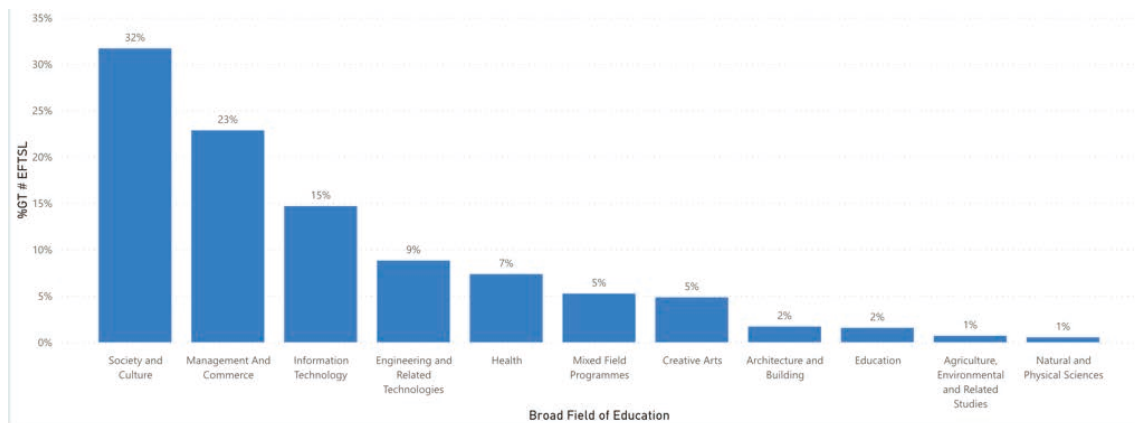
Work Experience in Industry

The Work Experience in Industry (WEI) indicator data collected by the Australian Government represents a sub-set of all WIL activity in Australian universities. WEI is narrowly defined by the Australian Government as “work undertaken by a student that is done as a part of, or in connection with, a course of study undertaken with a provider, in respect of which student learning and performance is not directed by the provider, and the purpose of which is to obtain work experience relevant to the course of study” (DESE, n.d.). The collection explicitly excludes WIL (or related) activity where the provider has ongoing contact with the student, and oversight, definition and management of their workplace-based educational content, student learning and performance, and standards (see DESE, 2021c). This appears to explain, in part, why the WEI EFTSL data represents such a small proportion of all student load (see below).

Our analysis of the Australian Government’s WEI data revealed that university student participation in WEI over the period 2015-2019 totalled 7,352 EFTSL (of a total 5 million EFTSL), indicating that while many students may participate in WIL activities, the time (load) attributable to WEI is negligible. Domestic students were over-represented at 6,361 EFTSL (of 3.5 million EFTSL). During this period, participation in WEI was highest in society and culture (32%) (predominantly legal practice), management and commerce (23%) (including accounting), information technology (15%), engineering and related technologies (9%) and health (7%) (including rehabilitation therapy, medical studies, other health, radiography, and nursing) (Figure 2).

9. In addition, there were three consortium NCP projects supporting students going to India. Note: A small number of these projects supported multiple host countries (including India), so the monies allocated has been rounded down to \$3.5 million.

Figure 2: EFTSL by Broad Field of Education as a Proportion of all WEI, 2015 to 2019

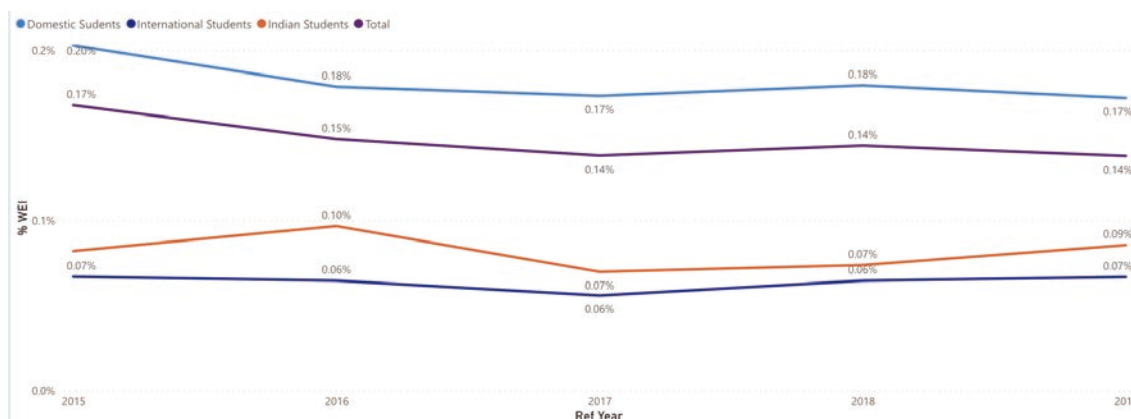


Source: WEI data (G. Harrison, personal communication, June 24 2021).

Despite initiatives aimed at increasing WIL activity, university student participation in WEI decreased from 2015 to 2019 (from 1571 to 1449 EFTSL). In 2019, most university students reporting WEI activity were enrolled on an internal (65%), rather than external (31%) or multi-modal (4%) basis, predominantly on a fulltime (86%) basis. Universities with the highest participation in WEI were the University of Technology Sydney (274), RMIT (215), Swinburne (185), Monash University (171), and the Australian National University (136). Together, these five universities account for over two thirds (68%) of all WEI activity in 2019.

Our analysis found that domestic student participation in WEI decreased from 1,408 EFTSL in 2015 (0.2% total domestic student EFTSL) to 1,221 EFTSL to 2019 (0.17%) (Figure 3). Participation of domestic university students in WEI was highest in 2019 in society and culture (37%) (predominantly law, and studies in human society), management and commerce (17%) (predominantly business and management, and accounting), mixed fields programs (14%) and information technology (10%). Participation was negligible in architecture and building, natural and physical sciences, agriculture, environmental and related studies, and education. At the broad field of education level, domestic student WEI participation decreased in all instances during the period 2015 to 2019, other than mixed fields programs, which increased from <1 EFTSL (2016) to 173 EFTSL (2019). This may reflect increased use of WEI for reporting generic or interdisciplinary WIL activity. At the narrow field of education, the only increases were recorded in performing arts, medical studies, economics and econometrics, law, and studies in human society. Domestic male students are somewhat over-represented (ranging from 50% to 53% during this period), as their overall participation is some 41% in 2019 (G. Harrison, personal communication, June 24, 2021).

Figure 3: Percentage WEI Overseas Domestic Indicator and Permanent Home Residence (Grouped) 2015 to 2019



Source: WEI data (G. Harrison, personal communication, June 24 2021).

International student participation was low in comparison to domestic students, increasing from 162 EFTSL (2015) (0.07% total international student EFTSL) to 228 EFTSL (2019) (remaining at 0.07% due to increasing absolute student EFTSL) (Figure 3). Contrasting domestic student participation, international student participation was highest in 2019 in information technology (41%), management and commerce (21%) (predominantly business and management), society and culture (15%) (predominantly law, and studies in human society) and creative arts (8%) (predominantly communication and media studies, and performing arts). Participation of male international students in WEI during this period ranged from 49% to 57%, compared to an overall participation rate of 52% (in 2019) (DESE, 2021d).

Our analysis found that Indian student participation in WEI was low, but increasing, from 17 EFTSL (2015) (0.8% total Indian student EFTSL) to 41 EFTSL (2019) (0.09%) (Figure 3). Indian males were also over-represented (62% in 2019). Indian international students participating in WEI activities were concentrated in 2019 in management and commerce (39%) (predominantly business and management), engineering and related technologies (24%) and information technology (22%).

Overall, this data tells us that WEI represents a negligible and decreasing subset of all WIL activity at Australian universities, with Australian male domestic students over-represented, relative to their participation rate. This data does not reflect the rich, varied, and comprehensive WIL activities undertaken by students enrolled with Australian universities.

APA.Intern program

The APA.Intern program, which connects PhD students to industry for 3-month internships co-ordinated by the Australian Mathematical Sciences Institute (AMSI) has placed 633 PhD students with 337 industry partners to date (including 155 in 2020). This program, involving 35 university partners, extended to online internships during 2020 (AMSI, 2021a). The data does not reveal whether any students undertook cross-border internships under this

program. Evaluations indicate that APA.Intern has been successful, with 26% of students to date offered employment post-internships (AMSI, 2021b). The participation and evaluation data suggest that expanding this model would enable more PhD students enrolled with Australian universities to undertake internships with industry.

ACEN graduate survey

In recent years, ACEN has commissioned the inclusion of WIL-related items in the Graduate Outcomes Survey conducted by the Social Research Centre for the Australian Government as part of the Quality Indicators for Learning and Teaching (QILT) surveys. In 2021, 31 higher education institutions included ACEN's WIL-related questions in surveys administered to graduates. Measures related to "participation in WIL; participation in employability related activities; influence of WIL on employment outcomes; and influence of WIL on qualifications preparedness" (ACEN, 2021, p. 1). This collection now effectively represents the best source of data regarding higher education WIL participation, despite not encompassing all universities or university graduates, and few NUHEPs.

ACEN (2021) reported that 51% of responding graduates had participated in a WIL activity for academic credit as part of their recently completed course. This includes workplace-based WIL (39%), WIL undertaken not in the workplace (16%) and a global WIL experience (6%). This level of participation in global WIL experiences is similar to the proportion of students from European countries undertaking an internship abroad (5%) (Wartenbergh-Cras et al., 2021).

ACEN reported (2021) that many graduates had also undertaken not-for-academic credit employability related activities, including volunteering (38%), holding a club or society position (18%), or being mentored through an industry-based arrangement (8%). Graduates of undergraduate programs (56%) were more likely to have completed WIL than those having completed postgraduate coursework (47%) or postgraduate research (18%).

Overall, international graduates were more likely than domestic graduates to have undertaken any WIL (55% compared to 49% respectively) and were more likely to have participated in a global WIL experience (8% compared to 6%). However, more domestic graduates participated in workplace-based WIL (40% compared to 37%). In terms of not-for-academic credit employability related activities, international graduates had higher participation overall (55% compared with 47%). Graduates from business and management (20%), science and mathematics (9%), humanities, culture, and social sciences (9%) and teacher education (9%) were well represented (ACEN, 2021).

Participation of VET students in WIL

Unlike in the higher education sector, the annual National VET Provider Collection undertaken by NCVET for the Australian Government provides a rich source of data concerning work-based delivery for onshore and offshore nationally recognised VET.

Analysis of this data by Osborne (2021) revealed that in 2019, 17% of all VET subjects (excluding subjects delivered through apprenticeship or traineeship training)¹⁰ used work-based delivery, either in entirety, or in conjunction with other delivery modes. This translates to some 800,000 students (Osborne, 2021). Importantly, this means that most such VET subjects (83%) do not use work-based delivery, including those subjects delivered as external only (11%), which supports further efforts to involve industry more closely in the delivery of VET in Australia.

According to Osborne (2021), field of education was the most dominant predictor of participation in work-based delivery, highest in radiography, pharmacy, philosophy and religious studies, medical studies, forestry studies, and justice and law enforcement. Students in biological sciences, accountancy and behavioural science were least likely to participate. Variations were also observed between states and mode (full/part-time), with non-apprentice/non-trainee VET students in Tasmania and Queensland, along with full-time students generally, more likely to participate in work-based delivery. VET subjects at Certificate III, Certificate IV and Diploma or higher were more likely to have work-based delivery than either Certificate I or Certificate II (Osborne, 2021).

10. Where apprentices and trainees are included, this figure increases to over 20% (Osborne, 2021).

Participation of industry in WIL as host organisations

Interest in graduate employability, system financing and research commercialisation has led to a wealth of studies on industry-education collaboration, instrumental, industry-oriented learning and applied research.

Industry perspectives reported in the Australian Industry Group's Survey Report, workforce Development Needs suggest that industry are increasingly connecting with higher education institutions (from 29% in 2014 to 41% in 2018), particularly for placements (36%) and partnerships for research projects (23%). Industry is also increasingly connecting with VET providers (from 22% in 2014 to 47% of respondents in 2018), particularly for apprenticeships (22%) and work placements (21%) (Ai Group, 2018).

The Ai Group (2018) found that employers recruiting university and VET graduates valued relevant work experience (higher education: 23%; VET: 20%) and qualifications obtained (higher education: 21%; VET: 20%). The Ai Group subsequently reported that "as business needs change, employers would take on more university or TAFE students as higher apprentices, cadets or interns to increase business skill levels" (2021, p. 21), particularly where government incentives are provided. Industry is interested in increasing links with universities and TAFEs, either by increasing existing relationships, or establishing new relationships. Despite studies reporting increasing competition for some types of WIL (i.e., placements), the Ai Group's research confirms Australian industry's interest in connecting with institutions for learning and research purposes.

Summary of participation data

In the absence of an annual collection of higher education WIL data, what emerges from our analysis of secondary data is an incomplete profile drawing on the Universities Australia audit and snapshots of specific cohorts of students (i.e., WEI, APA.Intern, NCP Mobility Program). ACEN's analysis of Graduate Outcomes Survey data collected by the Social Research Centre provides the most comprehensive picture of higher education student participation in WIL. However, there is currently no capacity to quantify participation in offshore WIL (generally, or by country), nor to clearly differentiate onshore/offshore WIL by mode (online; placement-based; other) over any period of time.

By contrast, in the VET sector, the National VET Provider Collection provides a comprehensive, regularised evidence-base, although additional detail would be useful regarding onshore/offshore distribution of work-based learning activity.

Where existing or new annual collections for the higher education sector accommodate the rich variety of WIL activity, explicitly identifying onshore/offshore activity, and online/face-to-face/hybrid mode, this would bolster the capacity for analysis of WIL engagement with strategic partner countries. Definitions deployed for such statistical collections would need to be sufficiently broad to accommodate the diversity of WIL activities undertaken by students enrolled with Australian higher education institutions.

Australian organisations with a presence in India

Data provided by DFAT suggests that at least 113 Australian organisations have operated in India to date. Our research found that some of these have subsequently ceased operations in India, while others have changed their name from that presented below.

Our analysis of DFAT's data revealed that Australian organisations that have operated in India have predominantly been in Maharashtra (28%, primarily Mumbai) in India's leading financial hub, the National Capital Territory (21%, primarily in India's capital, New Delhi), Karnataka (15%, primarily Bengaluru), India's leading technology hub, and Punjab/Haryana (13%, primarily Gurugram), a secondary financial and technology hub.

The available data from DFAT on size suggests that a third (34%) of those Australian organisations are medium-sized businesses (20-200 people), with 23% small businesses (5-20 people) and a further 20% large businesses (200+). Australian organisations operating in the mining, metals, and infrastructure industry sector (22%) have the largest presence, followed by those operating in the financial services (13%), healthcare and life sciences (13%), education (9%)¹¹ and ICT (9%) sectors (DFAT, personal communication, June 18, 2021). Several of these sectors correspond to the disciplines for university WIL reported by Universities Australia (i.e., health, education, engineering and related technologies, information technology).

Our research did not seek to determine the suitability or interest of these organisations to act as WIL hosts. Further research is warranted to determine whether at least some of these India-based Australian organisations could provide WIL opportunities for students enrolled with Australian higher education institutions and VET providers. This could include those studying offshore online in India, and those undertaking international mobility programs to India.

11. This includes AAMC Training Group - India, the Australian Retail College - India (operating under First Impressions Resources), the Australian Technical and Management College - India, Canterbury Education Group - New Delhi, Deakin International - India, ELS India (operating under ELS Educational Services - Australia), IDP Education - New Delhi, the Queensland Skills and Education Consortium - India, Stella Maris College, and the Australian Council for Educational Research - India.

Table 3: Australian Companies That Have Had Operations in India (n=113)

Regions and cities	Australian companies
MAHARASHTRA (Capital: Mumbai) (n=32; 28%)	
Mumbai	Agripower Fertilisers India Pvt Ltd, ANZ Bank - India, Auroch Advisory LLP, Australian Wool Innovation - India, Cactus Communications Pvt Ltd, Cochlear Medical Device Company India Pvt Ltd, Cockram Projects India Pvt Ltd, Commonwealth Bank of Australia - India, Destination NSW (India), Flex Health & Medical Supplies - India, IAG (Insurance Australia Group) India, Leighton India Contractors Pvt Ltd, Linfox Logistics (India), Macquarie Capital India Private Limited (Mumbai), Macquarie Infrastructure & Real Assets India Pvt Ltd (Mumbai), Medibank Health Solutions, NAB - National Australia Bank - India, Qantas Airways Limited (Mumbai), QBE General Insurance (India), Sanderson Group India Pvt Ltd, SBI General Insurance Company Ltd, Servcorp (India), SGE Laboratory Accessories Pvt Ltd, Solaft Filtration Solutions India Pvt Ltd, Sportstec India Pvt Ltd, Superior Jetties, Tourism Australia - India, Westpac Banking Corporation - Mumbai, WorleyParsons - India, Xtralis India
Pune	Tata Bluescope Steel Limited
Thane	J K Ansell Ltd
NATIONAL CAPITAL TERRITORY (Capital: Delhi) (n=24; 21%)	
New Delhi	Australian Council for Educational Research (India), Australian Technical and Management College (India), AWB India Pvt Ltd, Beyond Business Connections India, BHP Billiton (India) Pvt Ltd, Biotech Trading Pvt Ltd, Canterbury Education Group - New Delhi, CB Richard Ellis South Asia PA Ltd, DDF Consultants Private Limited (India JV partner of Mode Design), Deakin International - India, Entura Hydro Tasmania India Ltd, Gloria Jean's Coffees - New Delhi, GSES India Sustainable Energy Pvt Ltd, IDP Education - New Delhi, Macquarie Capital Advisers (New Delhi India), Rebound Ace Sports India, Resmed India Pvt Ltd, SAAB Defence Systems, Santos International Operations Pty Ltd (New Delhi), Sinclair Knight Merz - New Delhi, Taiyo Membrane India Pvt Ltd, Thales India Pvt Ltd, The George Institute for Global Health - India
Noida	Meinhardt - Noida - India
KARNATAKA (Capital: Bengaluru) (n=17; 15%)	
Bengaluru	ANCA Machine Tools Private Ltd, ANZ Operations and Technology Centre, Atlassian India, Attra Infotech, Cablex Systems India Pvt Ltd, Ferra Aerospace Pvt Ltd, George Clinical, Global Wear Solution India Pvt Ltd, Howards Storage World India - Bangalore, Kolar Gold Resources (India) Pvt Ltd, Multi-Vendor Support Services India Pvt Ltd, Novotech India, Raine & Horne India, Red Rooster Performance International Pvt Ltd, SBG Distributors Pvt Ltd, SISS Busines Systems Ltd, Telstra India
PUNJAB & HARYANA (Capital: Chandigarh) (n=15; 13%)	
Gurugram	ADG Sumavi Technical Services Pvt Ltd, AGA Assistance (India) Private Limited, AMP Capital Advisors India Pvt Ltd, Amplifon (India) Pvt Ltd, Boral Gypsum India Pvt Ltd, Bravura Solutions (India), Future Fibre Technologies India Pvt Ltd, Futures Group, Golder Associates Consulting India Pvt Ltd, Reinhart India Pvt Ltd, Secure Parking (India), SMEC (Gurgaon), South West Pinnacle Exploration P/L, StayWell Hospitality, Thiess India Pvt Ltd
TAMIL NADU (Capital: Chennai) (n=9; 8%)	
Chennai	Callington India Pvt Limited, ELS India, Heat and Control South Asia Pvt Ltd, Meinhardt Facade Technology (I) Pvt Ltd, Southern Cross Group India Pvt Ltd, Stella Maris College, Synapse Medical Services India Private Limited, Toll Logistics India, WTP Cost Advisory Services India Pvt Ltd
ANDRHA PRADESH (Capital: Hyderabad) (n=6; 5%)	
Hyderabad	Australia Retail College - India, Brien Holden Vision Pvt Ltd (BHV India), FBE India Pvt Ltd, Quantum Analytics Pvt Ltd, Queensland Skills and Education Consortium - India
Visakhapatnam	BirdGard India Pvt Ltd
GUJARAT (Capital: Gandhinagar) (n=3; 5%)	
Ahmedabad	BMT Consultants India, Simplot India Foots Pvt Ltd
Gandhinagar	Hydco Engineering Pvt Ltd
KERALA (Capital: Thiruvananthapuram) (n=3; 3%)	
Kochi	Flavourtech India, InQ Innovation Pvt Ltd
Chalakudy	Stemsel Foundation India
WEST BENGAL (Capital: Kolkata) (n=3; 3%)	
Kolkata	Orica India, Salva Resources - India, UGL - Texmaco
RAJASTHAN (Capital: Jaipur) (n=1; 1%)	
Udaipur	AAMC Training Group India

Source: DFAT, personal communication, June 18, 2021.

Note: Some of these Australian organisations no longer operate in India, and some have subsequently changed their names.

LEGISLATIVE AND REGULATORY FRAMEWORK GOVERNING WIL

Education laws

The education laws governing WIL are focused on ensuring quality, amongst other things (see Table 4). The Higher Support Act 2003 (Cth) is intended to ensure that universities remain responsible for work placements meeting academic criteria by making this a requirement for receiving government funding at the same level as other university courses. The Administration Guidelines 2012 that sit under the Higher Education Support Act set out the criteria that educational providers must meet for work to be classified as work experience in industry and still receive government funding (Chapter 5). These criteria stipulate interaction with the student including site visits, organisation of the student placement, ongoing monitoring of student work and progress, and assessment of student learning and performance during the student placement.

Apart from the higher education institutions themselves, a range of regulatory and enforcement bodies and agencies also govern how WIL is delivered. These include the professional accreditation bodies, the Tertiary Education Quality and Standards Agency (TEQSA), which has issued the Guidance Note: Work Integrated Learning, and the Fair Work Ombudsman, which provides guidance in relation to the application of the Fair Work legislation to vocational placements.

The role of TEQSA is to ensure that the courses offered by higher education institutions are consistent with the Higher Education Standards Framework (Threshold Standards) 2021. These Threshold Standards require higher education institutions to document for students any requirements for placements at the time of admission. Institutions must also ensure that facilities, including those where external placements are undertaken, are fit for their educational and research purpose; that academic and research integrity is maintained during placements; and that WIL and placements are quality assured, including assurance of the quality of supervision of student experiences. Importantly, the higher education institution remains accountable for courses and research training delivered through third party arrangements, including with an overseas party. While not issued by a regulatory authority, ACEN's Developing Collaborative Relationships with Providers may be used to guide institution's engagements with third party providers and intermediaries.¹²

For VET students, the Standards established under the National Vocational Education and Training Regulator Act 2011 (NVR Act)¹³ include a requirement to justify any workplace or simulated assessment and to provide advice on requirements for work placements or on-the-job training. The NVR Act applies outside of Australia to matters relating to a VET course or qualification. The Standards for Registered Training Organisations (RTOs) require prospective students to be provided with information about training and assessment, including any work placement arrangements. The Standards for VET Accredited Courses

12. These guidelines recommend 10 steps for developing partnerships with third-party providers: define a focused strategy; research internal needs, strengths and gaps; clarify processes and action plan; confirm specific requirements; seek out experts; assess legitimacy; pilot new initiatives; work collaboratively; formalise agreements; and strive for improvement (see ACEN, n.d., p. 2).

13. The NVR Act provides national consistency in regulation of the VET sector, using a standards-based quality framework which Australian jurisdictions have either adopted or mirrored (Victoria and Western Australia).

require course delivery mode, including requirements for work placements or on-the-job training, and assessment strategies to be specified. This includes justification for requirements for workplace or simulated assessment.

Higher education institutions and VET providers that provide courses to international students that include work-based training must seek approval from the relevant Education Services for Overseas Students Act, 2000 (ESOS) agency (TEQSA or the National VET Regulator) under the National Code of Practice for Providers of Education and Training to Overseas Students 2018. Under this legislation they may be required to demonstrate that any work-based training to be undertaken as part of the course is necessary for the student to gain the qualification and there are appropriate arrangements for the supervision and assessment of students.

Table 4: Governing Legislation and Regulation for Higher Education and VET WIL – Education Laws

Education and training quality and risk management	Higher Education Standards Framework (Threshold Standards) 2021 (Cth) Tertiary Education Quality and Standards Agency Act 2011 TEQSA's Risk Assessment Framework 2019 TEQSA Guidance Note: Work Integrated Learning 2017 National Vocational Education and Training Regulator Act 2011 (Cth) Standards for VET Regulators 2015 (Cth) (including the VET Quality Framework) Standards for Registered Training Organisations (RTOs) 2015 (Cth) Standards for VET Accredited Courses 2021 (Cth) Standards for Training Packages
Internationalisation	Education Services for Overseas Students (ESOS) Act 2000 (Cth) National Code of Practice for Providers of Education and Training to Overseas Students 2018 (Cth) Foreign Influence Transparency Scheme 2018 (Cth) Defence Trade Controls Act 2012 (Cth) National Security Legislation Amendment (Espionage and Foreign Interference) Act 2018 Australia's Foreign Relations (State and Territory Arrangements) Act 2020 (Cth)
Qualifications	Australian Qualifications Framework 2013 (Addendum No. 3 to AQF Second Edition January 2013)
Education and training, and WIL and work experience	Vocational Education and Training (Commonwealth Powers) Act 2010 (NSW) Vocational Education and Training (Commonwealth Powers) Act 2012 (Qld) Education (Work Experience) Act 1996 (Qld) Education and Training Reform Act 2006 (Vic) Ministerial Order 723 – Structured Workplace Learning Arrangements (Non-School Providers) Education and Training Reform Act 2006 (Vic) Ministerial Order 724 – Work Experience Arrangements (Non-School Providers) Guidelines for Registered Training Organisations and Employers in Relation to Post-Secondary Students Undertaking Practical Placements (2017) (Vic) Vocational Education and Training Act 1996 (WA) South Australian Skills Act 2008 (SA) Training and Tertiary Education Act (2003) (ACT) Vocational Education and Training (Commonwealth Powers) Act 2011 (Tas) Training and Skills Development Act 2016 (NT)
Professions	Health Practitioner Regulation National Law Act 2009 (replicated in each state/territory) Aged Care Act 1997 (Cth)
Funding for higher education and VET	Higher Education Support Act 2003 (Cth) Higher Education Support Act 2003 - Administration Guidelines 2012 (Cth)

Labour laws

Workplace protections under labour laws (see Table 5), including protections against discrimination, do not automatically attach to students undertaking WIL programs in a workplace. Under the Fair Work Act 2009 (Cth) (FWA) vocational placements can be lawfully unpaid, however, students undertaking unpaid 'vocational placements' are not treated as employees for most purposes under this legislation.¹⁴ Nevertheless, there may still be some protections under state legislation equivalent to the FWA.

Students engaged in unpaid WIL also face a lack of consistency in the legislative and regulatory framework relating to prohibitions against discrimination and harassment. At the federal level, the protections offered to employees under anti-discrimination legislation are not afforded to students engaged in unpaid WIL since they are not employees. This includes the Sex Discrimination Act 1984 (Cth), Racial Discrimination Act 1975 (Cth), Disability Discrimination Act 1992 (Cth) and Age Discrimination Act 2004 (Cth) which cover various workplace relationships but do not extend coverage to unpaid workers who are not employees. In some cases, state and territory legislation may provide additional coverage by extending anti-discrimination protections to unpaid workers, such as students undertaking vocational placements or WIL, but the variability between states adds to the complexity and raises issues of equity.

In all Australian jurisdictions, students undertaking unpaid WIL placements receive protection under workplace health and safety laws. The Work Health and Safety Act 2011 (Cth) includes in its definition of a worker a student gaining work experience. Most Australian states and territories have aligned their work health and safety legislation with the Commonwealth model and include this broader definition of worker. The exceptions, Victoria and Western Australia, extend protections to other non-employees present in workplaces, which may provide cover for students engaged in unpaid WIL. An additional layer of complexity is introduced when WIL occurs in offshore workplaces, where Australian workplace protections may not apply and where a WIL student's participation in the workplace may be subject to local laws.

14. A vocational placement is defined in s 12 of the FWA to mean an unpaid placement undertaken as a requirement of an education or training course and authorised under a federal, state or territory law or administrative arrangement.

Table 5: Governing Legislation and Regulation for Higher Education and VET WIL – Labour Laws

Professions	Health Practitioner Regulation National Law Act 2009 (for each state)
Employment relationships	Fair Work Act 2009 (Cth) Modern Slavery Act 2018 (Cth)
Remuneration	Workers Compensation Act 1987 (NSW) Workers' Compensation and Rehabilitation Act 2003 (Qld) Workers Compensation Act 1958 (Vic) Workplace Injury Rehabilitation and Compensation Act 2013 (Vic) Workers' Compensation and Injury Management Act 1981 (WA) Return to Work Act 2014 (SA) Workers Compensation Act 1951 (ACT) Workers Rehabilitation and Compensation Act 1988 (Tas) Return to Work Act 1986 (NT)
Work Health and Safety	Work Health and Safety Act 2011 (Cth) Work Health and Safety Act 2011 (NSW) Work Health and Safety Regulation 2017 (NSW) Work Health and Safety Act 2011 (Qld) Work Health and Safety Regulation 2011 (Qld) Occupational Health and Safety Act 2004 (Vic) Occupational Health and Safety Regulations 2017 (Vic) Work Health and Safety Act 2020 (WA) Occupational Safety and Health Regulations 1996 (WA) Work Health and Safety Act 2012 (SA) Work Health and Safety Regulations 2012 (SA) Work Health and Safety Act 2011 (ACT) Work Health and Safety Act 2012 (Tas) Work Health and Safety (National Uniform Legislation) Act 2011 (NT)
Privacy	Australian Privacy Principles of the Privacy Act 1988 (Cth) Privacy and Personal Information Protection Act 1988 (NSW) Information Privacy Act 2009 (Qld) Privacy and Data Protection Act 2014 (Vic) Information Privacy Act 2014 (ACT) Personal Information Protection Act 2004 (Tas) Information Act 2002 (NT)
Working with children	Child Protection (Working with Children) Act 2012 (NSW) Working with Children (Risk Management and Screening) Act 2000 (Qld) Worker Screening Act 2020 (Vic) Working with Children (Criminal Record Checking) Act 2004 (WA) Children and Young People (Safety) Act 2017 (SA) Working with Vulnerable People (Background Checking) Act 2011 (ACT) Children, Young Persons and Their Families Act 1997 (Tas) Care and Protection of Children Act 2007 (NT)
Discrimination	Workplace Gender Equality Act 2012 (Cth) Racial Discrimination Act 1975 (Cth) Sex Discrimination Act 1984 (Cth) Disability Discrimination Act 1992 (Cth) Disability Standards for Education 2005 (Cth) Anti-Discrimination Act 1977 (NSW) Anti-Discrimination Act 1991 (Qld) Human Rights Act 2019 (Qld) Equal Opportunity Act 2010 (Vic) Equal Opportunity Act 1984 (WA) Equal Opportunity Act 1984 (SA) Discrimination Act 1991 (ACT) Anti-Discrimination Act 1992 (NT) Anti-Discrimination Act 1998 (Tas)

Professional association requirements

International and Australian professional associations responsible for accrediting programs for regulated professions conducted by higher education institutions and VET providers influence program curriculum, pedagogy, delivery mode and location (see the list provided in Appendix 3). These requirements are more onerous for providers offering multiple professional programs (i.e., universities); however, NUHEPs, TAFE institutes and other VET providers must also comply when conducting accredited programs (as well as other regulatory requirements).

Amongst other matters, professional association requirements relating to WIL concern activities undertaken in Australia and/or offshore in professional programs such as accounting, health (e.g., nursing, medicine, psychology, social work), veterinary medicine, law, architecture, engineering, teaching and law/juris doctor programs. Some, but not all, professional associations require providers to comply with specifications regarding the location of learning (e.g., in Australia/offshore), mode (e.g., face-to-face, online, blended), supervision (e.g., registered professionals or academics supervising students undertaking WIL activities on location), and scope for reasonable adjustments (e.g., to recognise disability).

Interviewees emphasised that where professional associations established WIL requirements (including placements), “their placements are a must to graduate”. In some instances, interviewees advised that these requirements are such that mandatory WIL may only be undertaken in Australia. This is particularly relevant for students studying offshore online who need to return to Australia to complete WIL activities in Australia to graduate. Going forward, wherever Australia’s national and/or state borders are closed to international students, offshore online students should be prioritised for innovative WIL solutions, and entry to Australia to complete any outstanding onshore requirements, including WIL.

Our research suggests that professional association requirements regarding WIL can be positioned along a spectrum ranging from none, through minimal, to many. For example, interviewees reported that the Nursing and Midwifery Board of Australia’s (NMBA) requirements for offshore WIL are particularly onerous. The Registered Nurse and Midwife Accreditation Standards limit learning experiences outside Australia (for entry to practice registered nurse programs) to no more than one semester, or one sixth of the course (i.e., in pre-COVID times). The Australian Nursing & Midwifery Accreditation Council’s (ANMAC) 2018 Explanatory Note requires that clinical experiences undertaken offshore be supervised by a registered nurse or midwife with current, relevant experience. Where no such supervisory equivalence is available, the institution must ensure that an academic accompanies the student. Such strict supervisory requirements for offshore clinical experience, while important for quality assurance purposes, necessitate resource-intensive supervisory arrangements.

By contrast, offshore WIL requirements are less onerous for many other programs. For example, the Australian Computing Society Professional Standards Board (ACSPSB) (2016) ACS Certification Guidelines (for ICT practitioners) identify several pathways to certification involving qualifications, experience, competence, knowledge, and skill requirements rather than minimum WIL requirements (see ACSPSB, 2016).

Interviewees acknowledged differences in terms of professional association requirements relevant to their institution's offerings. One interviewee reported, "allied health professions, like physiotherapy [and] occupational therapy are a little less strict", such that "the students ... can be supervised for some of their time by someone from a different profession". In human services and social work, interviewees advised that, "for our placements that we've had overseas, ... one or two of our [academic] colleagues have had to actually go with the students and be part of that supervision". In engineering, while "each university interprets the Engineers Australia guidelines differently", the association "needs to be happy with how we're interpreting [the guidelines] to ensure that our accreditation continues". This means that while "students can do [their WIL activity] anywhere ... they must do a portion of that under the supervision of a professional engineer".

Professional associations responded in different ways to the challenges presented during the COVID-19 pandemic, including profession-wide and institution-specific changes. It could be expected that at least some of these transformations will be maintained, while others may only be utilised in times of other emergencies. For example, the NMBA introduced several reforms acknowledging challenges for students studying offshore online. In conjunction with ANMAC, the Board extended the period that students located outside Australia were permitted to study theoretical components of their program online and required education providers to have plans to refresh students' knowledge on their return to studies in Australia (see ANMAC, 2021). Both longstanding professional association requirements, and accommodations introduced in recent years frame opportunities for Australia-India WIL engagement for students enrolled in professional programs.

Nationally recognised training requirements

Some training packages specify mandatory workplace hours (Oliver & Wright, 2016), and research undertaken previously by the Australia India Institute regarding aged-care VET revealed that some training packages restrict work-based learning to host organisations in Australia (Rangan & Dhanji, 2018). In other instances, training packages restrict training to face-to-face and/or simulation modes; however, changes were made to accommodate mobility, work and learning restrictions in COVID-times. Currently, mandatory work-based learning requirements in accredited training products are subject to review by the Australian Government (see Training.gov.au, 2021). As a result of these developments, VET providers may have more flexibility going forward to accommodate online and/or offshore WIL.

Higher education institution and VET provider requirements

The document analysis revealed that WIL is also framed by higher education institution and VET provider requirements stipulated in enabling and delegated legislation and institutional policies governing practices and behaviours. Our research confirms that institution-specific requirements are more comprehensively articulated in institutional policy documentation by universities than either NUHEPs or VET providers.

Together with Australian Government legislative and regulatory requirements (i.e., labour law, education law), and professional association specifications, institution-level requirements in delegated legislation and institutional policies establish the parameters for students' WIL activity, including Australia-India WIL models.

Our research found that individual institutional policies, while establishing parameters for WIL, typically need to be read in conjunction with related governance documentation (e.g., other institutional policies). WIL institutional policies analysed for this project identify related policies concerning courses, partnerships, contracts and agreements, risk assessment and management (e.g., vehicles, working alone, confined spaces, plant and equipment, hazardous substances, dangerous goods, biologicals), disability, inclusion, and diversity (including reasonable adjustments), fitness to practice, academic integrity, student conduct and student grievances (including complaints and appeals handling). Related institutional policies also govern critical incidents, the prevention of bullying, sexual harassment and assault, intellectual property, and privacy.

For example, the University of Canberra Work Integrated Learning Policy (2020) nominates 16 related governance documents (i.e., policies, procedures, a charter, and a manual). Similarly, the Curtin University Fieldwork Policy (2021) nominates 17 related governance documents (i.e., statutes, policies, procedures, manuals, and forms). The breadth of this documentation illustrates the interconnectedness of WIL with multiple university operations, teaching and student administration, and the well-developed governance frameworks institutions have developed regarding WIL.

In addition to institutional policies and procedures governing WIL, the pandemic saw the introduction of COVID-19-related policy exceptions (Freeman et al., 2021), declaration requirements, and broad guidance covering, amongst other matters, internal state travel, interstate and international travel, personal protective equipment, and immunisations. In some instances, institutions provided health-related guidance specifically related to WIL. For example, see Domestic Fieldwork and COVID-19 Considerations (Windsor, 2020) and the Curtin University (2020) COVID-19 Declaration.¹⁵ It is likely that at least some of these changes will be maintained going forward as institutions analyse their pandemic responses to prepare for future emergencies.

Higher education institutions and VET providers maintain course, unit, skill set and training package outlines (and related information) that establish academic eligibility requirements or prerequisites, non-academic requirements (e.g., immunisations, visas, declarations),

15. As another example, the UNE Policy-based Response to Government Directions Associated with the COVID-19 Pandemic states that "Courses with practicum or work placements that are required for accreditation or to meet requirements for graduation will likely be impacted by the ability for industry to host students. Where possible, these placements will be deferred and replaced with alternative units to maintain progression. Students will be able to vary their course plan to delay their candidature related to the duration of the impact of COVID-19 on their course. Approvals will be granted by the Course Coordinator on a case- by-case basis, or Office for Professional Learning - as is the case in the School of Education" (University of New England, 2020, section 5.1).

assessment requirements, and grading schemes. Our research suggests that where WIL represents a formal part of a qualification, each of these requirements are relevant as they extend to aspects of WIL.

Our research found that institutional policies may state that students undertaking WIL must provide their contact details (e.g., in case of illness, accidents, emergencies, bullying, harassment) and complete required student declarations (e.g., working with children check, criminal history check, infectious disease status/evidence of specified immunisations, fitness to travel medical certificate, drivers licence).

Furthermore, institutional policies may state that students undertaking offshore WIL must complete required risk assessments and registrations (e.g., with the local embassy or consulate, in-country emergency services, the 24-hour travel emergency assist company, the host’s contact details). They must comply with DFAT travel advice, register their international travel, and have adequate insurance coverage. They may be required to complete a pre-departure country briefing covering cultural practices and customs. Some institutional policies state that doctoral students travelling overseas for activities such as WIL are required to complete an application for study leave.

Domestic students undertaking offshore WIL must comply with visa conditions established by the host country. They must have at least six months validity on their Australian visa. International students undertaking WIL in Australia or offshore must also comply with Australian Government visa conditions (e.g., maximum of 40 hours paid work per fortnight during session, unless participating in a WIL course approved under the Commonwealth Register of Institutions and Courses for Overseas Students [CRICOS]).

Institutional policies may also state that, where required, students must complete consent forms (e.g., consenting to transfer personal information), and agree to uphold confidentiality and intellectual property processes. Host organisations must also complete required preparation and agreements (e.g., induction checklists, agreements).

Policy actors interested in increasing opportunities for Australia-India WIL engagement should be cognisant of this complex, multi-faceted set of requirements, from government enabling legislation, visa conditions, and DFAT travel advice, through to stipulations in host organisation agreements as elaborated in Table 6, below. Finally, the wealth of documentation examined through our research attests to the depth of experience in Australian institutions in managing WIL.

Table 6: Government, Higher Education Institution and VET Provider Requirements for Providers, Students and Host Organisations

Government		Higher education institutions and VET providers			Students				Host organisations
Enabling legislation	Visa conditions	Delegated legislation and institutional policies	Health status declarations and guidance	Course and unit outlines	Student contact details	Student declarations, risk assessments and consulate registrations	Register international travel	Student consent forms	Host preparation and agreements
	DFAT travel advice			Skill set and training package outlines	Insurance	Study leave (PhD students)	Visa conditions		

KEY FEATURES OF WIL

Our research discerned key features of WIL in Australian VET and higher education. These key features concern the diverse types of WIL students will be looking to undertake, hence informing our understanding of Australia-India WIL opportunities. The following section broadly depicts the landscape of Australian WIL, and in most instances, provides a brief case study for illustrative purposes to demonstrate some of the remarkable diversity in WIL and related activities offered by higher education institutions, VET providers, industry, and others. It is not the intention of this report to analyse the prevalence or outcomes of each key feature introduced below; however, further research is warranted regarding the prevalence and outcomes of Australia-India WIL engagement.

Feature #1: Education and training sector

Both sectors - higher education and VET - offer opportunities for students to participate in WIL; however, as discussed, participation varies between the two sectors. All higher education institutions have at least some discipline-specific programs that involve WIL (e.g., teaching, health science), while many VET providers have industry-specific programs that involve at least some work-based learning (e.g., aged care, trades). Institutions also offer discrete programs (or learning outcomes within discipline/industry-specific activities) aimed at enhancing employability and entrepreneurship.

Case study – University of Queensland EMPLOY101x – Unlocking your employability

This course, a self-paced MOOC based on the university's approach to student employability development, has had over 50,000 enrolled learners since its launch in 2016. The course provides strategies and techniques to help students learn from their experiences, identify their unique capabilities and attributes, and effectively communicate their employability in different contexts, such as in the recruitment process and through pitching (see <https://employability.uq.edu.au/about/online-employability-course>). It complements WIL activities, helping students to understand the value of their experiences.

Case study - U21 Self-Reflection Toolkit supporting employability outcomes

Launched by Universitas21 with the University of Queensland in early 2021, the U21 Self-Reflection Toolkit draws on the concepts of experiential learning (see <https://universitas21.com/SRtoolkit>). It is designed to facilitate reflection and to help learners understand how experiences contribute to employability development. The toolkit contains resources for educators to assist them to engage students in reflection for employability, as well as materials for students and professional to support their independent reflective practice.

Case study – Austrade Digital Education Hub, and Employability Hub fostering employability

Austrade supports international students through their Digital Education Hub, launched under the Comprehensive Strategic Partnership between Australia and India (see <https://www.studyaustralia.gov.au/english/employability>). The Digital Education Hub includes multiple elements, including the Study Australia website, brand campaigns, events, and India literacy materials.

Austrade also supports the Employability Hub providing a Study Australia Work Readiness Program, the Study Australia Industry Experience Program (SAIEP), volunteer and industry experience information, guidance on work rights and protection laws, and advice on seeking internships and employment. Particularly relevant to WIL and employability more generally, the SAIEP targets current international students studying offshore online by connecting them (via Practera) with industry and domestic students in Australia in small, multidisciplinary project teams for a two week industry experience project. On completion, students receive a digital certificate from the Australian Government. Students may also complete a Study Australia Work Readiness Micro-credential (see <https://microcredentials.studyaustralia.gov.au/sg-courses/>).

Feature #2: Level of compulsion

Some higher education institutions and VET providers mandate WIL as a part of individual units, courses or training packages. Others mandate participation of all VET, undergraduate and/or postgraduate coursework students in WIL, including domestic and international students. Some institutions (e.g., RMIT) mandate participation of all students in WIL, regardless of their unit/course or level of study, while in others, participation is dependent on the individual students' study choices. Some courses (e.g., apprenticeships and traineeships) typically mandate participation in WIL.

Case study – ACEN's Preparing international students for WIL modules

Preparation is particularly important where WIL is mandatory and where students face challenges connecting or commencing with a host organisation (e.g., some international students). ACEN's online modules prepare international students to engage with Australian workplaces and participate in WIL activities. Online modules cover Preparing for Your WIL Experience, Succeeding in Your WIL Activity, Understanding Australian Workplace Cultures, and Undertaking WIL in an Online Environment (see <https://www.international-students.acen.edu.au/preparing-for-your-wil-activity/>). Some universities award digital badges to international students completing these online modules. ACEN's networking and sharing of resources have proved invaluable for WIL practitioners, with one interviewee reporting, "We share, and share and share".

Feature #3: Relationship to higher education or VET qualification

Our research revealed that students may undertake WIL which is formally part of their unit, course or training package (i.e., they receive academic credit), while in other instances, WIL may be additional to unit, course or training package requirements (e.g., extra-curricular activities).¹⁶ WIL may be embedded in discipline- or industry-specific units (e.g., teaching, nursing, aged care, trades), or embedded in a stand-alone unit (e.g., Introduction to WIL). In the VET sector, WIL may be aligned to a skill set, training package or apprenticeship (e.g., WorldSkills), or not. The extent to which, and way, WIL is assessed and/or contributes to grades varies (i.e., none, some, a lot).

Case study – Extra-curricular activities – Competitions (Olympiads, hackathons, and other challenges)

There are many competitions open to VET and higher education students. Olympiads are held for skills, science, mathematics and informatics involving school-age and/or post-secondary students. Leading competitions are run by governments (e.g., DFAT's GovHack with Infosys), consulting firms (e.g., KPMG Ideation Challenge), universities (e.g., Global Case Competition at Harvard, MakeHarvard, MakeMIT, MakeCornell), social enterprises (e.g., WorldSkills), finance institutions (e.g., Asia Investment & Banking Conference investment banking competitions), industry (e.g., Infosys #HackWithInfy), and data science communities (e.g., Kaggle). Some are country-specific (e.g., Smart India Hackathon). Hackathons International designs, develops and delivers hackathons, and makes available a free Hacker's Toolkit (see Hackathons International, 2021).

Case study – Industry certification from Atlassian

Interest in certification related to company-specific products has grown in recent years, particularly in industry sectors such as information technology. Industry certification may be undertaken by VET and higher education students as an extra-curricular activity, or collaboratively embedded in qualifications. Atlassian, an Australian company with a footprint in India (and other countries), delivers globally recognised certifications related to Jira, including Managing Jira Projects, Project Administration in Jira Server, and Jira Administration for Cloud. They also provide Atlassian Certified Expert status to those demonstrating expertise across various Atlassian solutions. The Atlassian certification process involves a combination of real-world experience, learning, and examinations.

Feature #4: Location

Students may undertake WIL in Australia or offshore. In Australia, WIL may be undertaken in the home state/location, or interstate, particularly for some disciplines (e.g., medical radiation science) due to the limited availability of host organisations or specialised infrastructure. Host organisations may be located in Australia, or offshore (e.g., offshore

16. Extra-curricular activities include competitions, industry certification (e.g., from Atlassian, Microsoft Azure, Amazon Web Services, Infosys), and volunteering.

WIL, and/or online WIL).

Case study – Victoria India Internship Program supporting Australia-India WIL, including offshore WIL

The Australia India Institute's internship program, sponsored by the Victorian Government, delivered WIL opportunities in India (15) and Australia (17) for Victorian university students enrolled in bachelor and master's coursework programs. Over two thirds were Indian nationals (23), while the remainder included domestic and other international students. The project involved participants undertaking WIL either offshore in India, or onshore in Australia. Students participating offshore in India were based in tier 1 cities (Delhi, Mumbai, Bengaluru, and Chennai) with large Australian companies (National Australia Bank, Tourism Australia), Indian industry associations (Federation of Indian Chambers of Commerce and Industry [FICCI], Confederation of Indian Industry), a private university (Jindal Global University) and an Indian pharmaceuticals company (CIPLA Pharmaceuticals). In-country support was provided by the Australia India Institute Delhi. Onshore WIL activities involved Indian companies in Australia (Tech Mahindra, Cognizant Technologies, Zomato); while one participant completed their WIL activity online. Two 'super hosts' accepted half of the project's cohort, demonstrating efficiencies gained from scaling.

In their testimonials following completion of the project, participants stressed the value of the opportunity for post-study employability: "I think it's always good to gain as much experience as possible before you graduate so that you don't have much trouble finding full-time work". Others emphasised the importance of gaining greater understanding of India: "Given India's incredible growth and immense size, knowledge in this area is unique and useful as [India] will remain an important trading nation for years to come".

Case study – Sannam S4 supporting offshore WIL

An Indian company that helps organisations explore, enter, and expand into different markets throughout the world. Since its inception in 2008 Sannam S4 has offered internships in India to international students and worked on government and privately funded projects with universities and industry to identify work placements and opportunities for students (i.e., as a third-party provider). From 2020, Sannam S4 has also offered virtual internships to students and graduates.

Feature #5: Remuneration

Students may be paid, or not paid, when participating in WIL. Some courses (e.g., apprenticeships and traineeships) typically involve participants being remunerated.

Feature #6: Mode

WIL may be undertaken face-to-face, online, or through blended mode in the workplace on campus (e.g., retail outlets, internships with faculties), in the workplace off campus (i.e., with industry), or in a simulated environment (e.g., simulated hospital; simulated manufacturing and engineering workshops; moot courts). Technology-enabled participation uses different platforms (e.g., Zoom, Microsoft Teams, Blackboard Collaborate), devices (e.g., computer, phone, tablet), assessment, learning management systems and increasingly, realities (i.e., virtual reality, augmented reality). As mode varies, the role of the host organisation varies (i.e., constructing, supervising, monitoring, and assessing WIL activities). The level of direct interaction with the host organisation also varies (i.e., from none, to 100% placement-based units or courses).

Case study – ACEN WIL guides supporting online WIL

With the growth of online WIL over the last decade, comprehensive resources have become available to support practitioners, host organisations and students. Notably, this includes ACEN's guides for online WIL entitled Online WIL (Work Integrated Learning) Practitioner Guide (Kaider et al., 2021a), Online WIL (Work Integrated Learning) Guide for Industry and Community Partners (Kaider et al., 2021b), and Online WIL (Work Integrated Learning) A Student Guide (Kaider et al., 2021c).

Case study – Deakin University Industry-University Partnerships for Sustainable Development Goal (SDG) Focused Internships in Australia and India

This project, sponsored by DFAT through an Australia India Council grant, supported university-industry collaboration through online workshops and master classes involving participants in Australia and India. The project involved the development of a digital hub to host sustainable development goal-focused internships. Led by Deakin University, the project involves partners in India (including FICCI, Amrita University, Indian Institute of Technology Mumbai, and Symbiosis International University) and the Australian India Business Council.

Feature #7: Length of any activity

Our research revealed that the length of WIL activities varies, with apprenticeships typically involving the longest periods with industry. Higher education institutions and VET providers may establish requirements in terms of hours or days (i.e., per week; per month; per unit or course), semesters (i.e., per year, per unit or course), or units of study (i.e., load). In other instances, students have more flexibility in making arrangements.

Feature #8: Co-ordination models

Our research revealed that WIL hosts, including those in Australia and offshore, may be secured by the student, co-ordinated by the responsible higher education institution or VET provider (e.g., WIL, global mobility, or education abroad offices), co-ordinated by the host organisation, or recruited directly by third party providers and intermediaries (see below). Host organisations may be identified using established education-industry connections, alumni, diaspora, social media, WIL/internship/volunteering platforms, and personal contacts. Institutions may also leverage existing institution-to-institution MOUs to secure hosts, particularly those located interstate or offshore.

Case study – Growth of third parties to co-ordinate WIL

Increasingly, third parties are being contracted to support WIL. Practera, developed by an Australian education technology (edtech) company, is an experiential learning platform for universities and industry to develop content, deliver and manage internships, projects, overseas study experiences, mentoring, accelerators, and skills credentialling. Practera's delivery features include structured workflows, 360 feedback, monitoring, analytics, chat, and management assessment.

Riipen, developed by a Canadian edtech company, is a platform for educators, industry, and students to incorporate project-based work into curriculum and internships. Riipen's delivery features include project creation, matchmaking students and organisations, streamlined management and communication, reporting and feedback.

Case study – Growth of internship platforms

Internship platforms provide resources for those interested in domestic and offshore WIL, employment, volunteering and travel. For example, GoinGlobal provides country and city career guides (including Australia and India) and promotes offshore internships and jobs. Other platforms include: Worldwide Internships, GoOverseas, International Internships, GoAbroad and GoVolunteer.com.au. Universities also run employment and internship portals (e.g., DeakinTALENT). Where students are responsible for securing their own WIL host, they can access such internship platforms.

Case study – Company specific internship programs (Infosys)

In some cases, individual companies co-ordinate large scale WIL or internship programs. Infosys, a leading Indian digital services and consulting company, runs global internship programs including InStep, Winternship and the Infosys Summer Internship. The 2021 Vault Internship Rankings ranked the Infosys InStep program number one in their Best Overall Internship Program category (Cision, 2020). Prior to 2020, Infosys hosted interns from over 50 countries in India for placement-based internships; however, in COVID-times, these internships shifted online. Offering opportunities across multiple disciplines (e.g., computer

science, information technology, management, liberal arts), in partnership with over 100 leading universities globally, Infosys internships provide opportunities for interns to learn and potentially transition into employment. Infosys has operations in Australia and well-established connections with Australian universities. These connections are integral to the success of the company's internship programs.

Feature #9: Management and monitoring models and technologies

Our research revealed that WIL may be managed by higher education institutions or VET providers, host organisations, or a third-party intermediary. Professional recruiters may also be involved, particularly where WIL activities are closely aligned with the transition to employment. Examples of third parties include business development companies (e.g., Sannam S4), education technology companies (e.g., Practera, Riipen), and student associations and communities (e.g., the International Association for the Exchange of Students for Technical Experience, VicWISE, Outcome.Life). Subject to quality assurance arrangements, third-party intermediaries may be particularly useful for WIL in offshore contexts foreign to Australian higher education institutions and VET providers.

Responsibility for preliminary risk assessment (pre-WIL), monitoring (during WIL) and evaluation (post-WIL) requirements and practices (i.e., visits to the host organisation) vary. VET and higher education institutions operate numerous WIL management technologies (e.g., InPlace integrated learning placement system) and other records management systems, and deploy various monitoring, evaluation and grievances systems (e.g., complaints).

Feature #10: Funding

Our research revealed that, in some cases, incentives may be available to support students to participate in WIL (e.g., travel, accommodation, including New Colombo Plan scholarships for Indo-Pacific work-based experiences), or to incentivise organisations to host students (e.g., tax incentives). Monies may be provided for services rendered by a third party (e.g., agent for student/host recruitment, or other third-party provider). Targeted, additional operational funding may be provided to higher education institutions or VET providers (e.g., pilot schemes). For example, some projects have secured Australian Government and/or state government funding (i.e., APR.Intern, the Australia India Institute's Victoria India Internship Program and the Deakin University Industry-University Partnerships for SDG Focused Internships in Australia and India).

Case study – New Colombo Plan incentivising offshore WIL

The Australian Government's New Colombo Plan (NCP) funds 10,000 scholarships annually for Australian undergraduate students to participate in funded mobility projects with partners in Indo-Pacific countries including India. These scholarships support collaborative

online international learning with partner institutions, online international learning (e.g., summer schools, semester-length study), internships and practicums, and WIL experiences where students solve real-life industry problems with organisations in the Indo-Pacific. Supported projects receive academic credit towards the student's Australian undergraduate program. For the 2022 round, the revised guidelines encourage "direct links ... between Australian institutions and those in the Indo-Pacific (rather than using third party providers) and [demonstration of] how relationships will be sustained ... e.g., through joint research/innovation, reciprocal student/staff mobility, joint delivery of academic programs and alumni engagement" (DFAT, n.d.). The NCP Internship and Mentorship Network connects registered private-sector organisations hosting scholarship recipients.

Feature #11: Qualification level

VET and higher education students, enrolled in Australian Qualification Framework (AQF) level 1-10, participate in WIL, depending on the unit, course, skill set or training package in which they are enrolled.

Feature #12: Requirements of professional associations

As noted, professional associations and assessing authorities responsible for regulated professions determine course accreditation requirements. This includes requirements for WIL, particularly in higher education. Professional associations may also establish parameters for fitness to practice and reasonable adjustments which influence student participation in WIL activities.

Feature #13: Fields of education and industry sectors

Students in all fields of education in higher education, and many industry sectors in VET participate in WIL, with those participating in professional courses, and VET courses for trades with mandatory registration and licencing requirements most regulated in terms of their WIL activities. As noted, in higher education, courses for regulated professions are available in accounting, health (e.g., nursing, medicine, psychology, social work), veterinary medicine, law, architecture, teaching and law/juris doctor courses. In VET, courses with mandatory registration and licencing requirements likely principally include trade-training (e.g., air-conditioning and refrigeration mechanic, electrician, plumber, builder).

Summary

Our research found that predictors for participation in Australia-India WIL include:

1. the sector in which students are enrolled (i.e., higher education students are more likely to be engaged in WIL);
2. the extent to which any student's institution mandates participation in WIL (i.e., generally, or in specific courses);
3. the field of study/industry sector and course in which students are enrolled; and
4. the students' interest in, and capacity to engage in Australia-India WIL (e.g., available financial support, and capacity to secure a host organisation for the WIL activity).

Institutions vary in the extent to which they support students to undertake WIL opportunities in different locations (i.e., onshore, offshore) and in different modes (i.e., face-to-face, online, blended). Approaches also vary in the ways in which they manage, coordinate and incentivise WIL (e.g., scholarships for students), with some institutions keenly interested in increasing Australia-India WIL engagement, and others prioritising other learning opportunities (i.e., extra-curricular activities; study tours).

This analysis suggests that a range of engagement models are warranted to increase Australia-India WIL, at least including:

1. extra-curricular activities that students can undertake with international peers independently of their studies, and irrespective of their institution's strategic interest in local, national or international industry engagement;
2. online WIL with Indian hosts in Australia or India that students may be encouraged to take in preference to learning with an Australian (or other foreign) host;
3. onshore placement-based WIL with Indian hosts (in Australia), such as TATA Consultancy Services, Tech Mahindra, NASSCOM Foundation, Cognizant, Wipro, and Infosys;
4. offshore placement-based WIL in India, particularly with medium to large host organisations in tier 1 cities (Delhi, Bengaluru, Hyderabad, Mumbai, Chennai, Gurugram).

CHAPTER 3: CHARTING INTERNSHIPS IN INDIA

Introduction

This section examines the evidence base around internships in India to inform the development of Australia-India WIL models. An understanding of participation levels (in higher education, skills development and internships), host organisations providing internships, India's legislative and regulatory framework governing internships, and key features is important. Industry interested in recruiting students enrolled with Australian institutions for WIL may be familiar with these parameters.

PARTICIPATION

Participation in higher education and internships

India's large higher education system continues to grow, with the student population reaching 38.5 million by 2019-20. Available participation data disaggregated by course type revealed that significant numbers of Indian higher education students enrolled in professional courses at undergraduate (7.9 million; 21%) and postgraduate (1.3 million; 3%) level in 2019-20.¹⁷ Further, disaggregated by discipline the data revealed that large numbers enrolled in technology, engineering, education, computer applications, medical science, law, pharmacy, nursing, and architecture programs (see Ministry of Education [MOE], 2020).

Given the importance of internships in India in facilitating graduate's successful transition into employment, particularly where higher education quality is variable, it seems likely that many students enrolled in professional courses in the disciplines highlighted would participate in internships. Almost all such interns studying with, or graduating from, India's higher education institutions would be Indian nationals as India attracts only a small number of international students (49,348 in 2019-20) (MOE, 2020).¹⁸

Interviewees confirmed that, as with Australia, quantifying the number of domestic and international students participating in internships is not possible as no pan-India or macro-level data collection on internships is undertaken. However, there are some indicative estimates of Indian student participation available at discipline or sector level. For example, the National Employability Report – Engineers Annual Report 2019 reports that 40% of Indian engineering students undertake internships, and 36% undertake projects additional to their coursework (SHL, 2020). In 2019-2020, this could equate to over 1 million Indian engineering students, as total enrolments in engineering and technology were 3.7 million (undergraduate) and 177,000 (PhD, MPhil and postgraduate level) (MOE, 2020).

Going forward, the Big News Network (2021) reports that 500,000 students in All India Council for Technical Education (AICTE) approved institutes will participate in online

17. In India, professional courses "are designed for learners to acquire the knowledge, skills and competencies specific for a particular occupation or grade or class of occupations or trades" (MOE, 2020, p. 34).

18. Most international students in India are drawn from other developing economies: Nepal (28%), Afghanistan (9%), Bangladesh (5%) and Bhutan (4%). A small proportion are drawn from the United States (3%). It is noted that many of these international students enrol in programs that typically would include internships (e.g., technology, engineering, pharmacy, medicine, surgery, dental surgery) (MOE, 2020).

engineering internships with EduSkills focused on cybersecurity, automation, artificial intelligence, machine learning and networking. Participation targets have also been set, with Prime Minister Narendra Modi announcing plans on India's 'Internship Day' on 25 August 2021 to provide 10 million internship opportunities by 2025.

In a state-level study, Choudhury (2019) found that 56% of Indian engineering students in Delhi participated in internships as part of their course, with participation highest for students enrolled with government institutions (66%). Other micro-level studies have examined prevalence, experience, and outcomes of internships in Master of Business Administration programs at one institution in North India (Chiramel & Priyadarshi, 2020), library and information science programs in Maharashtra (Sawant & Sawant, 2018), hospitality programs (Ganguli, 2019) and business schools (Neelam et al., 2018).

Participation in skills system and work-based learning

India's skills system continues to grow, albeit from a low base. This sector is complex, fragmented, and multi-faceted, involving multiple central and state government authorities, public and private stakeholders, and to varying degrees, institution and work-based learning (or on-the-job training). Freeman (2017a; 2017b) provides a detailed introduction to India's skills system, and a preliminary analysis of opportunities for Australian VET sector engagement with India, principally through transnational education (i.e., delivery of AQF/non-AQF and Indian accredited training to persons in India) rather than offshore WIL. However, the Government of India's comprehensive, aspirational policy reforms to India's skills system are such that much has changed in recent years.

In relation to India WIL, the extent to which India's formal skill system participants are exposed to work-based learning varies considerably, in part reflecting the sector in which they are enrolled. Mehrotra (2021) discerns different skills system sectors in India, including:

- vocational education in schools and higher education (e.g., Bachelor of Vocation Education);
- vocational education in National Skill Development Corporation's (NSDC) private training partnerships;
- public and private Industrial Training Institutes (ITIs);
- in plant training by industry; and
- diverse short-term skill development schemes of the Government of India's various ministries (e.g., Ministry of Rural Development short-term training programs).¹⁹

As with higher education, state-based or pan-India student participation data on India's skills system, and statistics regarding the number of students formally exposed to work-based learning through their studies in these sectors, is not readily available. Furthermore, data regarding industry participation in work-based learning for formal skills system participants – for Indian and international students – is also not readily available.

19. This categorisation revealed that, as with Australia, there is some overlap between high level VET and applied higher education as it relates to work-based learning, both in terms of (applied) disciplines (such as hospitality, travel and tourism), and initiatives. For example, the Scheme for Higher Education Youth in Apprenticeship and Skills (SHREYAS) "is a programme conceived for students in degree courses, primarily non-technical, with a view to introduce[ing] employable skills into their learning and promote apprenticeship as integral to education" (FICCI, n.d., p. 22). These higher education courses with embedded apprenticeships focus on information technology, retail, logistics, tourism, healthcare, electronics, media and management.

The available literature indicates that skills development undertaken by students enrolled with schools, higher education institutions, NSDC partnerships, ITIs, industry training and government schemes complements India's formal apprenticeship training system. This system was established in the 1960s under the Apprenticeship Act 1961 for engineering, non-engineering, technology, and vocational courses including trade, graduate,²⁰ technician, technician (vocational) and optional trade apprentices. Participation in India's apprenticeship system stagnated during the period 2000 to 2014, having reached only 280,000 participants by 2014.

More recently, participation in apprenticeships has slowly increased along with passage of the Apprenticeship (Amendment) Bill 2014, the introduction of the National Apprenticeship Promotion Scheme in 2016, and the efforts of the Central Apprenticeship Council since 2019 (Mehrotra, 2021). By 2019-2020, 305,000 apprentices were engaged with 27,500 active establishments (NSDC, n.d.).

While participation in India's formal skills system remains low, with only 2.4% of those in the workforce having achieved formal VET qualifications (Mehrotra, 2020), most of India's work-based learning occurs informally in the unorganised sector, disconnected from education and training institutions or qualifications (Mehrotra et al., 2013; Mehrotra, 2021; Sodhi & Wessels, 2016). This includes non-formal vocational training that can be classified as hereditary, self-learning, learning on the job, and other (Mehrotra et al., 2013).

It is not clear that Government of India policy reforms to India's skills system over the most recent decade have dramatically increased student or industry participation in formal skills development or work-based learning, and it is unlikely that India's skills system could readily accommodate inbound (or online) VET students. For these reasons, this chapter primarily concerns India's higher education system and related education-industry engagement.

SAMPLE OF ORGANISATIONS OFFERING INTERNSHIP OPPORTUNITIES

Our research on internship opportunities available in India, including an examination of Government of India and commercial internship platforms, confirms that organisations operating in India's formal economy routinely recruit students and the unemployed as interns. This includes multinational companies operating in India and Australia (e.g., Deloitte, Ernst & Young, Emerson, Starbucks), and Indian companies operating in both India and Australia (e.g., TATA Consultancy Services, Tech Mahindra, NASSCOM Foundation, Cognizant, Wipro, Infosys).

To illustrate the diversity of organisations in India recruiting interns, Table 7 presents a sample of private, public, and non-government organisations in various industry sectors. These organisations were identified from searches of the AICTE internship portal and commercial portals (e.g., Internshala, LetsINTERN, MakeIntern, HelloIntern, FreshersWorld),

20. A graduate apprentice is "a person who holds a degree in engineering/non-engineering and [is] undergoing training in [a] designated trade", whereas a technician apprentice is "a person who holds a diploma in engineering/non-engineering and [is] undergoing apprenticeship training in [a] designated trade" (FICCI, n.d., p. 17).

as well as targeted google searches. Many of the organisations listed are large, located in tier 1 Indian cities, and offer internships across industry sectors (e.g., technology, engineering, and accounting). In addition to the sample nominated in Table 7, many host organisations in the health sciences and education sectors recruit interns (e.g., hospitals, schools). Importantly, this list is provided for illustrative purposes only, as our research did not assess the suitability or otherwise of any individual organisation offering internship opportunities.

Table 7: Sample of Organisations Operating in India Offering Internship Opportunities, by Industry Sector

Sector	Companies
Technology	TATA Consultancy Services, Tech Mahindra, NASSCOM Foundation, Cognizant, HCL Technologies, Wipro, Tencent Games, BIGO Live, Amdocs, Dell EMC, Toshiba India, Cactus, EduSkills Foundation, IDS Infotech, IBM, CISCO, Directi, Arista
Telecommunications	Airtel, Jio, BSNL, Vodafone
Engineering and science	Infosys, TATA Group, Cipla Pharmaceuticals, Larsen & Toubro, Emerson, Maruti Suzuki India, Lincode, Volkswagen, Indian Space Research Organisation, Bangalore Metro Rail Corporation, Defence Research & Development Organisation, Aditya Birla, Reliance Industries, Smart Cities, Municipal Councils, National Highways Authority of India, Ujjawala Chemicals and Fertilizers, Veterinary Clinical Complexes, Farms
Accounting	Deloitte, Ernst & Young, Brand4Sure, LyncBiz India, Reserve Bank of India, RoboCapital, Goldman Sachs, Resurgent India, Axis Bank, Kotak Mahindra Bank, Godrej, SHL India, Finexta, HDFC Life, Life Insurance Corporation of India, ICICI Prudential Life Insurance, American Express, Paypal
Retail	Myntra, Marico, ABInBev, Paper Boat, CARS24.com, Fashion at Big Bazaar, Adidas, Decathlon, DesiDime
Hospitality	Zomata, OYO Rooms, Hyatt, Pizza Hut, Food Panda, Starbucks
Communications and media	Zee Entertainment Enterprises, SunTV Network, Hindustan Times, Bennett, Coleman & Co, India Today Group, GQ India, The Indian Express
Law	Government ministries and instrumentalities (e.g., Ministry of Social Justice and Empowerment, NITI Aayog), Legal services authorities (e.g., State Legal Services Authorities), Arbitration centres (e.g., Delhi International Arbitration Centre), Centres (e.g., Centre for Tax Laws), Commissions (e.g., Delhi Commission for Protection of Child Rights, National Commission for Women), World Bank, United Nations
Architecture	Vastu Shilpa Consultants (Sangath), Studio Mumbai, Auroville, Anupama Kundoo Architects, Studio Lotus, Hafeez Contractor, Akshay Kaul and Associates, Amit Khanna Design Associates Delhi, Mosaic Design Goa, Narendra Dingle Pune, Opolis Architects Mumbai

In addition to this sample, formal arrangements are in place with hosts in some key industry sectors. For example, the AICTE has signed MOUs with host organisations able to provide support for Indian higher education institutions offering internship opportunities, including Clarivate Analytics, the Engineering Council of India, the National Institute of Electronics and Information Technology, the Telecom Sector Skill Council, National Productivity Council, Youth4work, HireMee, WeMakeScholars, eMBarkers, SCHOLARSMERIT, Campus Quotient, Fourth Ambit and StudentingEra. This snapshot demonstrates the ubiquity of internships in India and suggests there is scope for increased Australia-India WIL engagement where institutions establish education-industry connections.

Benefits of internship participation

This report is primarily concerned with opportunities for students enrolled with Australian higher education and VET institutions to engage in Australia-India WIL. As such, it is intentionally both Australia-centric, and India facing. The target cohort are students foreign to India (other than a few Indian nationals enrolled with Australian institutions, that engage in Australia-India WIL).

Our research drew on scholarly literature examining the benefits of internship participation to understand the environment in which Australia-India WIL engagement can best proceed. It is in this environment that benefits of participation – not explicitly a focus of our research – can be realised.

While there is negligible national, state-level, professional program or discipline-based data – and no data regarding international student participation in internships in India (or with host organisations in India, online) – the benefits of participation in internships are acknowledged by Indian policy actors, institutions, and industry. For example, the leading education policy think tank and deemed university, the National Institute of Educational Planning and Administration (NIEPA), reports, “increasingly, evidence suggests that internships have significant benefits in improving employability potential of students and help them in securing future career opportunities. ... Internships help in preparing students with job-relevant employability skills which are valued by employers, such as teamwork, adaptability, planning and effective communication” (2021, p. 80).

These benefits need to be understood within the context of India’s rapidly expanding education systems, persistent questions regarding system quality acknowledged by the Government of India (see Ministry of Human Resource Development [MHRD], 2020), and high levels of graduate unemployment (Altbach, 2021). These issues contribute to widespread discussion regarding the ‘mismatch’ between education and industry needs (i.e., supply and demand), and the capacity of India’s economy to absorb graduates (see SHL, 2019; Tilak & Choudhury, 2021). Several of these issues were confirmed by interviewees, with one observing, “India is increasing access [to education], but quality has been deteriorating” such that “there are a few [institutions] who are really good, and there are many which are really bad”. As discussed in the following section, issues regarding system access and quality represent a focus for India’s National Education Policy 2020 (NEP) and various other regulatory reforms.

LEGISLATIVE AND REGULATORY FRAMEWORK GOVERNING INTERNSHIPS AND WORK-BASED LEARNING

Education laws

Our research found that there is limited central regulation or management of internships in India's higher education system, which is of particular concern for domestic and international students enrolled with Indian institutions. One interviewee confirmed this, advising, "there's actually very little regulation around interns in India. We could, pretty much, do as much or as little as [we] wanted to". This is also of interest to Australia-India WIL engagement, to the extent that regulations and norms influence opportunities for foreign students – including those enrolled with Australian institutions - interested in Australia-India WIL.

In recent years, the key regulatory authorities, the University Grants Commission (UGC) and AICTE have introduced some limited guidance for Indian institutions (i.e., covering their enrolled domestic and international students). The UGC, for example, issues guidelines for some (but not all) centrally mandated programs. The 2020 UGC Guidelines for Higher Education Institutions to Offer Apprenticeship/Internship Embedded Degree Programme enable higher education institutions to embed credit-bearing 'apprenticeships', or internships into general degree programs. These guidelines recognise the role of internships in linking higher education with industry needs and providing industry-led, practice-oriented, and outcomes-based learning that also improves the employability of graduates (see UGC, 2020). These guidelines call upon higher education institutions to introduce the Apprenticeship/Internship Embedded Degree Programme which embeds internships into an undergraduate degree by including at least one semester for internships. Credits for the internship are to be included in the overall program credits, with the guidelines calling for at least 20% to be allocated to the internship. In delivering this course, institutions must first enter into an MOU with the relevant host organisation. Assessment of a student's performance through the internship is to be carried out by the education institution in consultation with the host organisation. For most programs, however, UGC-approved higher education institutions determine, on an institution-by-institution and program-by-program basis, any internship requirements.

Whereas the UGC typically leaves the mechanism of internships for individual programs (other than for regulated professions) to individual institutions, the AICTE Internship Policy: Guidelines and Procedures sets out in some detail how mandatory internships can work for technical education in India at both diploma and degree levels at AICTE-approved institutions. According to this policy, diploma/degree-level internships for engineering students can involve inter/intra institutional activities (e.g., workshops, consultancies, research projects, festivals, events, contributions in incubation, tinkering labs), innovation/entrepreneurship activities (e.g., competitions, business plans, registration of start-up,

leadership talks, technical expos), formal internships, rural internships, project work and seminars.

Students enrolled in postgraduate programs at AICTE institutions can choose an industrial project for their dissertation topic (i.e., 20 weeks in semester 3, and 32 weeks in semester 4). The AICTE Internship Policy states that “the Industrial Project work done during [a] 6-month/one-year internship program is equivalent to their M.Tech one semester/two semester thesis work” (n.d., p. 18).²¹ Notwithstanding this central directive, AICTE-approved institutions remain responsible for implementation, and this will vary across the system.

Labour laws

Internships in India’s labour market remain largely unregulated. This represents a concern for both students enrolled with Indian higher education institutions, and students enrolled with foreign institutions seeking to engage in internships in India (i.e., Indian and international students).

Our research suggests that, even after recent law reforms that consolidated and simplified many existing labour laws into four comprehensive codes, neither Indian nor international interns are guaranteed many of the protections that are offered to employees in India. Part of the issue is that, while the four new labour codes have received Presidential assent – Code on Wages, 2019, Occupational Safety, Health and Working Condition Code, 2020, Industrial Relations Code, 2020 and the Code on Social Security, 2020 – they have not yet come into force.

The new Code on Wages forecasts that workers from all industries will be entitled to receive a minimum wage, but currently the minimum wage applies only to a limited number of industries and is fixed at different rates by respective state governments according to skill-level and industry sector. Under current law, Indian and international interns are not legally entitled to a minimum wage, a factor which leaves them exposed. As one interviewee remarked, “there isn't actually a minimum wage guarantee in India, which is what employers exploit” when fixing wages. Another interviewee pointed out that interns, many of whom are not paid, are dependent on the policies of the various host organisations: “it is up to the company’s internal policies whether they want to pay or not”.

The issue extends beyond the payment of wages. Indian and international interns undertaking internships in India are also missing out on many of the other entitlements legally due to workers, and in many cases may be engaged without a formal contract. As Mehrotra (2021) reports, “91 per cent of workers [in India] are informally employed (usually with no written contract and no old-age pension, death/disability insurance, maternity benefit)” (n.p.).

Many interns have limited access to the protections offered under anti-discrimination and health and safety laws. Even where laws do apply, these may not be enforced. The legislation addressing the issue of workplace sexual harassment, the Sexual Harassment of

21. The policy set out requirements for internships delivered by AICTE-approved institutions concerning duration, academic credentials, health and safety issues, the role of the AICTE, MOUs with the host organisation, the role of the host organisation in planning and delivery of the internship, expectations of the intern including keeping a diary or daily log and monitoring and evaluating the internship.

Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (known as the POSH Act), takes a very broad definition of ‘employee’ that could cover the situation of many interns, paid or unpaid. However, there is a lack of clarity on some of the key elements, including what constitutes sexual harassment, employer obligations and the remedies and safeguards available.

There may also be a reluctance on the part of Indian or international interns to invoke the protections available under the legislation. Interviewees noted that “those kinds of laws [OHS, anti-discrimination] are not very strong in India, even for the employees for that matter”. Further, interviewees suggested that those who experience sexual harassment may “find it very difficult to take recourse in such laws because it often means that you’re being labelled”, with a negative impact for future work opportunities and promotion.

Registration of foreign nationals

Students enrolled with Australian institutions interested in travelling to India for WIL must secure the appropriate Government of India visa (e.g., a research visa, for higher degree by research students). Students who are foreign nationals in India on longer term internships or study experiences should be aware of the requirement to register with the Foreign Regional Registration Office (FRRO).²²

Professional council requirements

India’s professional councils, established centrally by the Government of India, govern regulated professions. These councils establish and evaluate practice requirements (e.g., parameters for higher education qualifications including internships, post-graduate work experience, professional training) for health science, law, teaching, architecture, veterinary science, accounting, and engineering professions.²³

Subsequent to the release of India’s NEP, reforms are underway which would see professional councils subsumed by the General Education Council under the new regulator, the Higher Education Commission of India (HECI) as Professional Standard Setting Bodies (except for medical and law councils). Requirements regarding individual programs will also change as NEP provisions regarding degree structures are implemented (i.e., shift to 4-year degrees).

Our research revealed that most Indian professional councils stipulate internship requirements; however, some do not for all courses. A small sample of the comprehensive, centrally established requirements for large numbers of courses for regulated professions is provided below for illustrative purposes.

Health science

Medicine: The National Medical Commission Undergraduate Medical Education Board

22. Foreign nationals, including their family members, who intend to stay in India for more than 180 days, must register with the FRRO within 2 weeks of arrival in India. For the purposes of registration, the individual is required to make an application in the prescribed form and be present in person at the time of registration (see Ministry of External Affairs, 2021). For further information on employment law, see INDUSLAW, 2021.
23. As labour markets in developing economies are typically less regulated in comparison to emerging or developed economies, there are more professions regulated via professional councils in Australia than there are in India (e.g., aviation, computing, social and community work, surveying, translation) (see Freeman, 2018).

Draft Regulations for Compulsory Rotating Internships, 2021 defines internships as “a phase of training wherein a medical graduate will acquire the skills and competencies for practice of medical and health care under supervision in preparation for independent, unsupervised primary care” (2021, p. 3). After completing their course requirements and final medical examinations, medical students complete an internship for a period of 12 months in order to meet the requirements of the Bachelor of Medicine and Bachelor of Surgery (in accordance with the National Medical Commission’s Permanent Registration Regulations 2021). During their internship, interns rotate between different departments and specialities (i.e., community medicine, psychiatry, general surgery), as specified in some detail in the regulations.

Pharmacy: The Pharmacy Council of India’s Education Regulations, 2020 for Diploma Course in Pharmacy specifies that students undertake “five hundred hours of practical training spread over a period of not less than three months” (2020, p. 12). The regulations specify practical hours for various subjects (e.g., 75 hours for pharmaceuticals; 75 hours for social pharmacy), as well as practical training activities (e.g., stocking of drugs and medical devices; no less than 250 hours dispensing prescriptions). Practical training is undertaken in hospitals/dispensaries and pharmacies, with hosts required to sign a Practical Training Contract Form for Pharmacists.

Indian Medicine: The Indian Medicine Central Council (Minimum Standards of Education in Indian Medicine) Amendment Regulations, 2016 specify that once students have completed all subjects and examinations, they shall normally undertake a Compulsory Rotatory Internship for a period of one year with Ayurvedic hospitals (for six months) and primary and community health centres, rural, district and civil hospitals, as well as government hospitals of modern medicine (for another six months). The regulations stipulate rotations through different departments (e.g., Kayachikitsa, Shalya, Panchakarma). Similarly, the Indian Medicine Central Council (Post Graduate Ayurveda Education) Regulations, 2016 specify that students “shall have to attend the hospital” and “the student of clinical subject shall have to do resident duties” (p. 164) with “emphasis ... on intensive applied and hands on training” (2016, p. 165).

Dentistry: The Dental Council of India BDS Course Regulations 2007 stipulates that the Bachelor of Dental Surgery (BDS) degree includes, at the completion of all coursework and examinations, a one-year internship in a recognised Dental College. Internships are compulsory, with students paid a stipendiary allowance. The regulations state that the objectives of the internship are “to facilitate reinforcement of learning and acquisition of additional knowledge; ... to facilitate the achievement of basic skills: attaining competence vs. maintaining competence ...; to facilitate development of sound attitudes and habits ...; to facilitate understanding of professional and ethical principles ...; [and] to initiate individual and group action, leading to disease prevention and dental health promotion” (2007, pp. 87-88). The regulations clearly establish the internship content (e.g., oral medicine and radiology; periodontics; orthodontics). Similarly, the Dental Council of India’s Master of Dental Surgery Course Regulations, 2017 stipulate that “each trainee shall work in the clinics on [a] regular basis to acquire adequate professional skills and competency

in managing various cases” (2017, p. 5). The regulations provide an evaluation checklist for clinical work completed in outpatient departments (e.g., interaction; maintenance of case records; investigations work up).

Law: The Bar Council of India Rules of Legal Education 2008 specifies that “each registered student shall have completed a minimum of 12 weeks internship for Three Year Course stream and 20 weeks in case of Five Year Course stream during the entire period of legal studies under NGO, Trial and Appellate Advocates, Judiciary, Legal Regulatory authorities, Law Firms, Companies, Local Self Government and other such bodies” (2008, p. 34). Further, the regulations provide that State Bar Councils prepare a list of suggested Senior Advocates willing to guide interns.

Teaching: The National Council for Teacher Education (Recognition, Norms and Procedure) Amendment Regulations, 2019 state that the “Integrated Teacher Education Programme (Arts and Science streams) shall be of four academic years comprising eight semesters including internship (field-based experiences and practice teaching)” (2019, s. 2.1). Higher education institutions are “allowed up to 30% flexibility while adapting or modifying the model curriculum” (2019, s. 4).

Architecture: Several councils issued amendments to requirements in response to the COVID-19 pandemic. The Council of Architecture (Minimum Standards of Architectural Education) Regulations, 2020 “prescribe that the Practical Training shall be undergone by the students during the 8th/9th semester of the Architecture Degree course for a period of six months or one semester in the office of an architect”. However, due to disruptions caused by the COVID-19 pandemic, the Council of Architecture advised that, “if required, the incoming Practical Training may be shifted to the last semester or swapped with other semesters” (2021, p. 1). Further, the Council recommended that institutions “encourage placement of their students in local offices to avoid travel of students and encourage online work, especially in Covid-19 sensitive areas/regions” (2021, p. 2). It is unclear what changes made in response to the pandemic will be maintained going forward.

Veterinary Science: The Veterinary Council of India Minimum Standards of Veterinary Education (Bachelor of Veterinary Science and Animal Husbandry – Degree Course) Regulations, 2016 state that “during the course of study there shall be training in a veterinary clinical complex or state veterinary hospital, private veterinary hospital, animal farm or livestock farm complex as part of the course” (2016, p. 90). All students must “undergo [a] compulsory rotating internship ... for a minimum of twelve calendar months” (2016, p. 95), supported by an internship allowance and accommodation. The regulations identify appropriate hosts (e.g., veterinary clinical complex, zoo or wildlife centres, farms), requirements regarding entrepreneurial training and management, reporting requirements and competencies.

Accounting: The Institute of Chartered Accountants of India Chartered Accountants Regulations, 1988 (updated as on July 1, 2013) establish criteria for applicants to be eligible to practice as a chartered accountant, including criteria relating to practical training

requirements. For example, the regulations state that an articled assistant or apprentice may be engaged in training “for a period not exceeding six months” (2013, s. 54A), while audit assistants undertake “industrial training ... [ranging] between nine months and twelve months” (2013, s. 72). As these assistants may (or may not) have completed accounting qualifications, such industrial training requirements are unrelated to higher education specifically.

Engineering: The Engineering Council of India, which auspices many professional engineering associations, launched a central registration process for engineers in 2015. Registration as a professional engineer is open to candidates who have completed a Bachelors’ Degree in Engineering/Technology from a recognised higher education institution, holding at least seven years’ relevant work experience as an engineer.

Our research revealed that many of India’s professional councils explicitly establish mandatory internship requirements for domestic and international students enrolled in professional courses with India’s higher education institutions. More than in Australia, mandatory internships associated with many professional courses in India are:

- conducted after completion of course requirements and final examinations;
- supported by stipendiary allowances;
- conducted in the workplace (rather than online);
- conducted over an extended period (e.g., six to 12 months).

In addition, our research found that Indian professional council requirements relating to professional courses implemented throughout the country are frequently very detailed, explicitly identifying appropriate types of host organisations and internship content to the learning outcome level.

While these requirements do not extend to foreign students (e.g., those enrolled with Australian institutions), Indian host organisations operating in these areas – including hospitals, pharmacies, law and accounting firms, schools, architecture and engineering practices – may be familiar with Indian professional council internship requirements. These requirements, therefore, feasibly influence the framing of any opportunities for inbound foreign students interested in Australia-India WIL.

National Education Policy 2020

The NEP forecasts increased internship opportunities for school students (from Grades 6-12), and greater emphasis on internships in the undergraduate curriculum. It also foreshadows the delivery of a “holistic education” through higher education institutions, where “students may actively engage with the practical side of their learning and, as a by-product, further improve their employability” (MHRD, 2020, pp. 37, 46). In this context, internships are being encouraged by both the UGC and AICTE (see previous section).

In addition to pedagogy and curriculum reforms, the NEP foreshadows higher education system structural changes which would see stand-alone, discipline-specific institutions upgraded to comprehensive institutions. This reform would particularly impact stand-alone technical, health science, law, and agriculture universities, many of which offer professional courses involving internships. Systemic restructuring could lead to increased interest in internships amongst the broader student community, as well as increased competition for internship places; however, this remains to be seen as the NEP is progressively implemented.

Internships as recruitment tools

While higher education research regarding internships is emerging in India, there is growing evidence of industry support for internships. Wheebox's (2021) India Skills Report 2021 emphasises the role of internships as a recruitment strategy, and this was confirmed by our research. One interviewee reported that, "in most companies, internships are seen solely as a way to hire". Foreign students seeking internships, but not migration pathways, may be disadvantaged in this environment, as Indian industry look to recruit interns interested in an employment pathway in India.

In recent years, Indian industry has increasingly turned to technology to recruit interns and new employees at scale. With technology advancements, recruitment processes now include online assessments and group exercises, conference meetings, third party recruitment portals, and recruitment services (Wheebox, 2021).

In this technology-driven environment, our research suggests that the role of education and training qualifications and other traditional signals of employability have diminished. Rapid, scalable approaches to recruitment have emerged that rely on new kinds of inputs (e.g., online tests) and processes involving artificial intelligence. Reimagined recruitment practices take into account changes to work conditions and environments (i.e., online work environment, not limited to place or time zone). Institutions and students need to be prepared to navigate such technology-driven environments to secure WIL opportunities in India where signals regarding institutional reputation and graduate employability are changing.

KEY FEATURES OF INTERNSHIPS

The following section describes key features of internships in India derived from our interviews and document analysis including publicly available materials from Indian education authorities, professional councils, and higher education institutions reflecting national, sub-national (state) and institutional level requirements. Our research suggests much variation within and across India's higher education and skills systems, with many internships occurring at the micro-level as a result of "institutional effort", as one interviewee advised.

The key features presented primarily relate to higher education as there is limited material available regarding work-based learning in India's skills system, and our research concluded that VET students in Australia are unlikely to participate in Australia-India WIL involving cross-border mobility at this stage.

Charting this landscape is essential as it provides insights about the possible expectations of Indian organisations that may have capacity to provide Australia-India WIL opportunities. It also alerts us to some of the ways in which internships vary in India, both in comparison with WIL in Australia, and across India. As one interviewee advised, India's "heterogeneity also needs to be understood", cautioning against any "one-India" narrative.

The following section provides high level descriptions of India's internship landscape. It recognises that, as one interviewee advised, "knowledge of internships is very limited. ... If you get into the types of internships, then the knowledge is further limited, because we do not know what kind of internships [students undertake] ... We don't have many studies on internships". This interviewee confirmed that there is also negligible literature available analysing internship modes (e.g., face-to-face, online), location (in India, abroad), student preferences, reliability, effectiveness, or impact on graduates' careers. As such, our research contribution is preliminary and tentative.

Feature #1: Education and skills sector and the labour market

Our research revealed that the internship market encompasses at least three cohorts: (1) those without qualifications; (2) higher education students undertaking courses; and (3) graduates including those that are unemployed (or underemployed). Specific groups may be prioritised for some internships (e.g., entry level, unpaid internships for those seeking a pathway to employment; return-to-work internships for women; internships for freelancers, performing 'gig' or 'microwork'). For many, completion of an entry-level internship is essential for transitioning into paid employment. It appears that, to a much greater extent than Australia, the Indian internship market caters for those outside formal education structures and courses. As one interviewee advised, "internships ... are demand driven. ... There is a high waiting time between the completion of the course and also, getting a job. Because there is huge unemployment. Even educated graduates, highly educated graduates They wait [a] very long time to get a job". As such, internships play a different role in the labour market in India than in Australia.

Feature #2: Level of compulsion

Our research revealed that higher education institutions offering UGC centrally developed courses must adhere to delivery specifications (e.g., the Bachelor of Vocation), while AICTE-approved institutions are expected to deliver courses involving mandatory internships. As discussed elsewhere, higher education institutions offering courses for regulated professions must comply with mandatory professional council requirements. Self-

accrediting higher education institutions offering other courses (i.e., not for regulated professions) may embed internships into courses on a course-by-course basis. These courses (including curriculum, pedagogy, and any inherent requirements such as internships) are approved by the institution's academic boards. As with Australian WIL, the level of compulsion in India varies considerably.

Feature #3: Relationship to higher education or skills qualification

Our research revealed that higher education students may undertake internships which are formally part of their course (i.e., they receive academic credit), while in other instances, internships may be additional to course requirements (e.g., voluntary internships and/or extracurricular activities). Internships may be undertaken in concert with other higher education coursework (like much Australian WIL), or after all coursework requirements and examinations have been completed (unlike much Australian WIL). In India's formal skills sector, trade apprentices may participate in skill competitions at local, regional and All India levels (e.g., mechanic, electrician, tool and die maker competitions). The extent to which, and the way, internships are assessed and/or contribute to grades varies (i.e., none, some, a lot).

As noted, to a much greater extent than in Australia, internships in India are external to education requirements, and not necessarily considered to be linked to student learning. As one interviewee advised, "they don't look at it that way, they look at it as a job ... to adjust. And in some cases, if you are sitting [unemployed] for [a long time] after completion of the course, there is a negative impact on your career. So, to catch up ... they go for internship". This interviewee further advised, "because there is a huge supply of graduates, then definitely industries ... can get graduates to work. ... But what jobs they're engaging [in], ... nobody knows".

Feature #4: Location

Interviewees reported that some Indian higher education students travel within India to undertake internships (e.g., to tier 1 cities), similar to migratory flows within India for work. This partly explains why accommodation in host organisation's hostels and travel support were emphasised by interviewees, particularly for disadvantaged students. It appears unlikely that most Indian higher education or skills students would undertake placement-based internships offshore; however, there is limited data regarding these matters.

Feature #5: Remuneration

As with Australian WIL, higher education students in India may be paid, or not paid, when participating in internships. Many are unpaid, which is particularly problematic for disadvantaged students incurring accommodation, food and transport costs when staying in big cities (Bose, 2018). While several Indian interviewees reported paying interns, one

survey respondent stated that their interns were unpaid while undertaking a full year's internship program. Some professional councils mandate internship conditions for students enrolled in professional courses (e.g., stipend, leave, accommodation in a guest house). As a developing economy, where internships in India are paid, the remuneration rate is comparatively very low. Interviewees advised that higher education students (or graduates) undertaking an internship on a paid, full-time basis could expect to receive up to AUD\$160 per month; however, rates for paid internships advertised on internship platforms are typically much lower and many would be unpaid. In the skills sector, the Apprenticeship (Amendment) Rule, 2019 stipulates minimum stipend rates (i.e., from INR 5,000-9,000/month, equivalent to \$85-\$160/month).

Feature #6: Mode

As with Australian WIL, Indian internships may be undertaken in a workplace (i.e., with a host organisation), online, or in a simulated environment (e.g., simulated manufacturing and engineering workshops; virtual laboratories; moot courts; using virtual and augmented reality). Education authorities and professional councils may specify eligible modes for internship delivery. As identified in Australian WIL scholarly literature, Pillutla et al. (2019) argue that there are insufficient placement-based internships and projects in India.

Feature #7: Length of any activity

Our research revealed that this varies, with Indian internships associated with professional courses typically involving long periods (e.g., 12 months, full time), while the AICTE Internship Policy stipulates 630 hours for Bachelor of Technology and Bachelor of Engineering students (equivalent to 45 hours/week for 14 weeks). These requirements are considerably longer than many Australian WIL activities. Other internships are much shorter (e.g., 4-6 weeks), and may be undertaken during the summer holiday 'internship season' between mid-April to June/July. Higher education institutions may establish requirements in terms of hours or days (per week; per month; per course), semesters (per year, per course), or units of study (i.e., load).

Feature #8: Co-ordination model

As with Australian WIL, internships may be secured by the student, co-ordinated by the responsible higher education institution, host organisations seeking internships, or recruiter. AICTE approved institutes are expected to establish dedicated Training and Placement Cells; however, there is little information regarding the implementation of central directives to establish such structures. One interviewee suggested, "that is not happening". Some Indian higher education institutions have job placement cells (Sawant & Sawant, 2018), and they may have some responsibility for placing interns.

Responsibility for preliminary risk assessment (pre-internship), monitoring (during internship) and evaluation (post-internship) requirements and practices vary. One

interviewee operating in India emphasised how important, but resource-intensive this work is: “I wouldn’t dare suggest [a host] where I’m not sure that a student is going to be safe or not. ... There’s a lot of work that goes into identifying [host] agencies where your students can go”. Another interviewee suggested institutions played lesser roles: “they are finding that because ... there are different employers, a little effort is required at least. From the institution side. That you need to connect the internship people, industry, or whatever. ... [But] that extra effort is not being taken by many institutes”.

Given the centrality of internships to the recruitment process in India, one interviewee advised their company is integrally involved in the co-ordination process and has well established partnerships with many education institutions, in India and globally: “We know the faculty, we know the careers services, we know the admissions processes, and we know what kind of students we want from which part of that class”.

As the following case studies illustrate, government and commercial parties operate internship platforms to a much greater extent than Australia, possibly reflecting India’s scale and emphasis on students taking primary responsibility for securing internships.

Case study – AICTE internship portal

The AICTE internship portal provides a platform for verified organisations to promote internship opportunities to students. Indian students may register, providing their institution name and student identification details. Face-to-face and online internships are available throughout India via a range of government sponsored schemes including the following:

- The Urban Learning Internship Program, co-ordinated by the Ministry of Housing and Urban Affairs in conjunction with the AICTE, targets engineering graduates interested in interning with smart cities and urban local bodies. In 2020, 1,650 internships were offered, involving 135 host organisations. Key partners include Sangli Miraj Municipal Council, Pune Municipal Corporation, Nashik Smart City Development Corporation Limited, Tiruppur Smart City Ltd., Aligarh Municipal Corporation, Salem Smart City Ltd and Bengaluru Smart City Ltd.
- In 2021, the Ministry of Social Justice and Empowerment Internships provided opportunities for some 1,300 students to create awareness of the Nasha Mukta Bharat Abhiyaan (Drug Free India) campaign through social media accounts (i.e., Facebook, Twitter, Instagram).
- In 2021, the AICTE, in partnership with CISCO and NASSCOM FutureSkills, offered 20,000 free, two-month, online Cyber Security Internships for 2nd and 3rd year CISCO Networking Academy engineering students. Interns complete CISCO’s Introduction to Cyber Security, Introduction to Packet Tracer and Cyber Security Essentials courses.
- Urban Water Infrastructure Internships are available for new graduates interested in interning under the Atal Mission for Rejuvenation of Urban Transformation. Preference is given to engineering graduates.
- The Upskilling Program in Software IoT (i.e., Institute of Things), sponsored by the

Ministry of Electronics and Information Technology, is available for final year and graduate engineering and computer science students. Interns complete Internet of Things online learning offered by India's professional association for technological innovation (IEEE) in collaboration with the Centre for Development of Advanced Computing.

Case study – Commercial platforms

Our research revealed that a growing number of commercial internship platforms operate in India. These platforms cater for students and unemployed persons interested in securing internships and employment opportunities, particularly in unpaid, short-term, entry level management (e.g., marketing, finance, customer service), media (e.g., content development), information technology (e.g., software) and campus ambassador, sales positions. Many internships available through these commercial platforms are oriented towards freelancers rather than enrolled students. While opportunities may be with host organisations in related fields, advertised positions appear primarily oriented towards applicants transitioning into or securing employment, rather than meeting course requirements. In-person and online opportunities are predominantly available through these commercial internship platforms in India's tier 1 cities (Delhi, Bengaluru, Hyderabad, Mumbai, Chennai, Pune, Kolkata, Gurugram).

These platforms and recruiters post internship and employment opportunities and connect recruiting organisations with applicants. Platform operators provide additional services at cost, including internship and employment preparation (e.g., resume writing), and non-accredited courses and certifications (e.g., information, business, general skills) linking providers with customers.

Key examples of such commercial internship platforms include the following:

- Internshala advertises internships and related online courses (e.g., programming, digital marketing, creative writing). In 2020, nearly five million applicants used the platform, with 400,000 securing internships (Outlook, 2021). Most recruiting organisations using this platform are start-ups and small and medium enterprises (SMEs). The most popular internships sought through Internshala were in management (38%), engineering (29%) and media (21%) (Roy, 2020).
- LetsINTERN advertises internships, volunteering opportunities, brand ambassador positions, and employment opportunities. Nearly four million applicants and 30,000 recruiting organisations use the platform (LetsINTERN, n.d.).
- MakeIntern advertises internships and related online courses (e.g., English, financial management, digital marketing).
- HelloIntern advertises internships and related online courses (e.g., web frameworks, data science, marketing, and finance).
- FreshersWorld advertises internships, aptitude tests and interview scripts. Applicants can purchase employment assessment tests, and interview preparation support.

Feature #9: Qualification level

Diploma, undergraduate and postgraduate students participate in internships, and apprentices participate in work-based learning. While courses for regulated professions are offered at the undergraduate and post-graduate level, one interviewee advised that PhD students may take some classes during their candidature (i.e., to gain teaching experience).

Feature #10: Requirements of professional associations

As noted previously, professional councils centrally establish internships requirements for courses for regulated professions.

Feature #11: Fields of education and industry sectors

Our research revealed that, as with Australian WIL, students in all disciplines participate in internships. In some instances, internships focus on, or are complemented by entrepreneurship programs, reflecting the dominance of India's informal sector, high graduate unemployment, emergence of start-ups, and government schemes (e.g., Stand Up India). In other instances, internships involve mentorship (e.g., Google Summer of Code).

RECEPTION OF INBOUND STUDENTS

Lessons from international students' WIL experiences in Australia

The scholarly literature tells us that many international students in Australia experience problems securing or participating in WIL due to "cultural differences, inflated expectations, difficulties managing assessment tasks, relatively weak language skills and an imbalance in the support needed ... in comparison to what is on offer" (Jackson, 2017, p. 344). Lloyd et al. (2019) found that international engineering students "face challenges in accessing quality WIL placements especially ... Women In Non-Traditional Areas (WINTA) and Non-English Speaking Background (NESB) students" (p. 1). These challenges have been attributed to "systemic prejudices, including biases about students' motivations, capabilities and discretionary power; and detracting workplace cultures including those which are discriminatory" (p. 1).

Studies have also observed that international students and other temporary visa holders frequently face systemic exploitation in the workplace (Blackmore et al., 2014; Jakubowicz & Monani, 2015). This finding is consistent with the Australian Government's Report of the Migrant Workers' Taskforce (see Migrant Workers Taskforce, 2019).

In their audit of WIL in universities, Universities Australia (2019) highlighted challenges faced by international students seeking WIL opportunities including limited access to information, language and cultural barriers, lack of work experience, and employer perceptions. Indeed, several Indian international students in the Australia India Institute internship project participated in offshore WIL in India as they were unable to secure WIL placements in Australia. One interviewee advised that at least some of these challenges relate to international students' status as temporary migrants: "there's so many companies that would say that 'if you're not a permanent resident, then we don't want you as part of a graduate internship program'".

Possible implications for students enrolled in Australia seeking India WIL opportunities

Acknowledging these very real challenges for international students, it is feasible to suggest that students seeking offshore WIL in a country other than their own will face some challenges securing and/or undertaking WIL. Such challenges may be amplified in linguistically diverse countries such as India where students may also be unfamiliar with the culture or business practices. One focus group participant advised, "even though we say India probably has the largest population speaking English, ... it's not necessarily common practice in a lot of the industries or companies". Focus groups and interviewees consistently stressed the varied cultural environments in India, and emphasised the imperative to prepare outbound students well, for their own (and host organisation's) safety as much as enjoyment and fulfilment.

One focus group participant advised that host organisations in India prefer to recruit Indian interns, stating "there's a preference for having their own local students because they're able to understand the culture and the work ethic better in the Indian company". The context of India's labour market – with high graduate unemployment, and large companies required to meet corporate social responsibility (CSR) obligations – means that, at least for some host organisations, "their first priority will be to prove to the Indian government that Indian students are of concern to them". One interviewee advised, "for an Indian person working in India, [getting an internship] is a very critical piece of engagement ..., and it means a great deal for their career trajectory".

What this means is that inbound foreign students (other than Indian nationals) intending to undertake WIL activities in India may be at a disadvantage, particularly those without any qualifications (i.e., undergraduate students) or Indian language skills.

Positioning of foreign internship applicants

By contrast, one interviewee suggested that students from elite institutions in the United States and Europe have a reputational advantage when seeking internships in India: "For a lot of our businesses [in India], they know a lot of the American schools. They know a lot of the European schools. When they receive applications from them, it's like 'Oh yeah.

Of course. I know this school or that school". Other interviewees suggested that inbound students, by virtue of their status as 'foreign', may be advantaged in their search for WIL opportunities in India. Similarly, for interns associated with well-recognised government schemes, such as the National Colombo Plan, "The reputation gets taken care of right there, because they're part of NCP. And then NCP takes care of making sure the students are good". In such instances, perceptions have less to do with any student's country of origin, than the fact that they are seen to have an 'internationalised' view and have successfully navigated screening by a government authority.

Somewhat similarly, one interviewee suggested that some host organisations may view having foreign interns as prestigious: "If at all they were to look at other nationalities, it is for the prestige factor and it gives them the ability to get some kudos, saying, 'oh yeah, we have got a worldwide internship scheme and we have got all of these nationalities participating". Another rejected this assessment, stating: "Australian universities do not have that much of [a] reputation. ... Australian degrees do not count so much in India. So, I don't think we can pretend that there's a lot of prestige in them". Consistent with this sentiment, one survey respondent, when asked "what is the reputation of Australian VET and higher education qualifications in India?" responded, "nil".

Host organisations blind to students' country of origin

Our research also revealed an alternative view, that with technology advances and the normalisation of remote study and work, host organisations are increasingly blind to the applicant's country of origin and focus instead on assessments of their potential capabilities. Many large organisations now select interns at scale using advanced technologies: "And everyone applied, whoever wanted to. ... they were all taken to a test. The ones that cleared the tests were taken through a ... group exercise ... [and] we observed ... how quickly somebody was able to grasp and learn". Using advanced online testing technologies, such organisations "know how trustworthy this person was during the test or the interview ... it is auto-checked, [and] everybody's given a score". These technologies, increasingly including artificial intelligence, allow large organisations to recruit interns and employees at scale: "so, we have platforms and solutions ... that make it very easy for us to upgrade at volume".

Interviewees consistently emphasised that organisations now recruit interns globally: "It doesn't matter where someone comes from, or lives, or goes. All that matters is inclination, learnability, and the contribution one can make to the purpose of the organisation". Similarly, another interviewee observed, "if it was an Indian student over here, they're equally disadvantaged, as opposed to an Australian student going over there, they're equally disadvantaged as well. But there is definitely the benefit, which is the cross-mingling of cultures and of views, and the internationalisation that someone [gains] when they're working with someone from a different background".

Summary

There is limited research available regarding internships or work-based learning in India, either in the higher education or skills systems, notwithstanding the Government of India's systemic policy reforms introduced in recent years. Available participation data suggests large numbers of higher education students enrol in professional courses in disciplines where internships could be expected (e.g., technology, engineering, health science, law, education). India's formal skills system enrolls few students when compared with the school and higher education sectors, and it is unlikely that VET students from Australia would undertake WIL in India in large numbers.

Our research suggests, however, that industry in India routinely recruit students and the unemployed as interns, with multinational and Indian companies operating internship schemes readily identifiable. Many such opportunities are disconnected from education, oriented more towards those transitioning into the paid labour market, or the gig economy.

As with Australia, there is considerable variation in internship offerings by higher education institutions. Apart from some AICTE and UGC directives, and detailed specifications issued by India's professional councils, there are few regulatory controls on internships in India. Much decision-making is made at the institution-level, and by individual hosts. While the ways in which people work, learn and undertake internships has changed in recent years, further research is required to more clearly comprehend the internship space in India. This includes the capacity for industry to host students undertaking India WIL while enrolled in courses with foreign institutions.

Our research does suggest, however, that the most important role for the Australian Government and institutions is ensuring the quality of education available to students of the Australian system, such that students are well placed when competing internationally for WIL opportunities, that they have the skills to perform well during recruitment, and to perform well in their roles. The quality of education, the outcomes that students achieve, and their capacity to demonstrate skills and knowledge on the global stage, rather than the reputation of Australia's institutions, appears paramount.



CHAPTER 4: AUSTRALIA-INDIA WIL MODELS

Introduction

Reflecting on the landscape charted in the previous two chapters, this chapter briefly canvasses barriers to WIL opportunities derived from the scholarly literature, and then reports our research findings regarding barriers to offshore WIL in India. This chapter also reports our research findings regarding good practices in Australia-India offshore WIL. It concludes by introducing Australia-India WIL models we developed to increase Australia-India WIL engagement.

BARRIERS TO WIL: CANVASSING THE SCHOLARLY LITERATURE

There are multiple barriers constraining the uptake of WIL for students of the Australian higher education and VET systems, and the literature examines these extensively. Consistent with a range of other studies, Atkinson (2016) summarises the main barriers as follows:

- Financial constraints and the costs associated with hosting students, apprentices and trainees, which leads to some employing organisations charging providers or relying on incentive payments.
- Lack of time or interest to invest in supervision and guidance.
- Limited information about [VET] work-based learning and [higher education] work-integrated learning.
- Lack of consistent understanding of work-based learning and work-integrated learning, their different aims and varying roles, and the expected outcomes across all parties.
- Differing expectations about the outcomes and benefits of work-based learning and work-integrated learning, and how the outcomes and benefits might vary between different employers.
- Lack of flexibility and responsiveness on the part of the education institutions to accommodate employer needs and the business cycle.
- The complex nature of education providers' systems, while bureaucracy can be confusing for employers unfamiliar with the process and unsure of who to contact at education institutions.
- Limited information on the opportunities and processes associated with work-based and work-integrated learning.
- Lack of industry relevance and outdated curricula or technology.
- Occupational health and safety issues.
- Legal concerns, such as industrial relations and intellectual property.
- Lack of potential students in the location or region.
- The size of the business, that is, too small to take on students. (pp. 11-12)

As noted, Universities Australia (2019) highlighted barriers faced by international students accessing WIL opportunities in Australia, along with challenges related to the co-ordination of WIL, understanding regulations, and supply/demand tensions.

Given the focus of this project on Australia-India WIL engagement, our research identified seven key barriers related to offshore WIL in India. These barriers, which impact students, host organisations, higher education institutions and VET providers differently, can be summarised as follows (Table 8). The chapter extensively relies on rich qualitative data to illustrate these barriers.

Table 8: Barriers to Offshore WIL in India

For students (all students)	For host organisations	For higher education institutions and VET providers
#1 – Cost	#2 – Insurance	#1 – Cost
#3 – Fear of the unknown	#5 – Availability of hosts (supply/demand tension)	#2 – Insurance
#4 – Limited interest in India	#7 – COVID-19 pandemic restrictions	#3 – Fear of the unknown
#6 – Lack of inclusivity		#5 – Availability of hosts (supply/demand tension)
#7 – COVID-19 pandemic restrictions		#7 – COVID-19 pandemic restrictions

BARRIERS TO OFFSHORE WIL IN INDIA: REPORTING OUR RESEARCH FINDINGS

Barrier #1: Cost

Our research found that the most frequently cited barrier to participation in offshore WIL in India is cost. For students, focus groups agreed that “it’s ... very expensive”. In addition to domestic and international tuition fees, students participating in offshore WIL typically incur direct costs (i.e., visas, travel, accommodation and living expenses in India), while losing income from part-time or casual employment, and paying their ongoing accommodation charges in Australia. In some instances, students incur costs associated with third-party provider services (e.g., Practera), and additional insurance (i.e., travel insurance). Focus groups reported that, “we have quite a few students who’ve expressed interest [in] ... the international internship, who aren’t able to [go] because of cost factors”. For some international students “studying [onshore in Australia] on bank loans, [where] their primary project is to actually get a part-time job and make some money to subsidise on the borrowing”, offshore WIL is not financially viable. For the VET sector, focus group participants reported that “not many [VET] students here ... can fund travel to another country, and there’s not a lot of companies who are willing to fund student travel to another country just so they can get a little bit of broadening of experience or exposure to different cultural elements”.

For higher education institutions, focus groups reported high operational costs associated with offshore WIL, including student and host organisation recruitment and preparation,

risk assessment/due diligence, co-ordination, and management, and increasingly, contracting third-party providers. Many agreed that “it’s going to cost a lot more [to manage] offshore, just because of the geography and physical distance and the amount of time and effort [institutions] have to [expend] putting those arrangements in place”. For some professional courses and high-risk countries such as India, institutions may also incur costs sending supervisory academic staff overseas. One focus group participant reported, “funding ... would really make the difference” to their institution’s capacity to offer offshore WIL in India. Given the level of investment required, some focus groups expressed concerns regarding “bandwidth and the resources that are available to [their] university [for] securing and curating offshore opportunities”. With the pivot to offshore online study amidst border closures in recent years, some higher education institutions reported prioritising internationalisation investment in offshore study centres (or ‘hubs’) in key markets such as India and China rather than offshore WIL. Sharma (2021) explains that a hub “provides a physical space to study with good internet connections, a space to meet other students, study together, and have additional face-to-face support and non-curriculum classes in areas such as study skills, writing papers, research in the Western context, and career support” (p. 1).

For VET providers, some focus group participants reported that, while “our students would love to do it”, in terms of cost, “it’s definitely a limitation for the VET sector”. Focus groups emphasised that the VET sector is primarily focused on meeting local industry needs, while one interviewee highlighted the importance of all students thinking globally on matters related to their studies (e.g., global supply chains).

Higher education institutions and VET providers looking to increase Australia-India WIL engagement will need to provide low-cost options (e.g., extra-curricular activities with Indian peers; online WIL with Indian hosts in Australia or India), as well as options recognised as requiring investment by students and institutions (e.g., offshore placement-based WIL).

Barrier #2: Insurance

The second most frequently cited barrier to participation in offshore WIL in India is insurance. Focus groups and interviewees reported that, in some instances, potential offshore hosts do not hold, and may not be able to secure, sufficient public liability and/or personal accident insurance. Small and medium-sized organisations in developing economies such as India, particularly those operating in the informal sector, are least likely to comply with Australian institution’s insurance requirements for offshore WIL. This includes many emerging start-ups. One participant observed, “many of the ... organisations that we deal with [offshore] cannot comply with our insurance requirements; our public liability amounts and things like that”. One focus group participant reported insurance-related issues with credit-bearing offshore WIL in India. In circumstances where the potential offshore host or WIL activity is deemed high risk, institutions may require students to take out personal accident and travel insurance.

More generally, some focus groups reported their institutions being somewhat hesitant to assume such risks associated with offshore WIL in India: “whether it’s real or perceived risk, the university treats India as ... reasonably risky as a destination for students”. Relatedly, focus groups reported concerns regarding some host organisations’ health and safety protocols, and due diligence expectations (e.g., offshore site-visits may be required before and/or during WIL activities, and questions remain as to whether institutions can delegate to third parties to perform such inspections overseas).

Higher education institutions and VET providers looking to increase Australia-India WIL engagement in the form of offshore placement-based WIL in India will need to prioritise host organisations holding sufficient insurance. Typically this will mean avoiding many small and medium sized enterprises, including at least some startups.

Barrier #3: Fear of the unknown

The third most frequently cited barrier to participation in offshore WIL in India is fear of the unknown. One interviewee observed, “because students are a bit nervous about it. Many students who go on these mobility programs haven’t travelled before or haven’t travelled much before”. The contraction of South Asia Studies in Australian universities limits the extent to which higher education institutions can readily familiarise students about India or provide Indian language programs. Focus groups highlighted more generally that, “when [students are] travelling offshore, because they’ve often got different foods, different languages, different cultural customs, all of these things they need to be able to deal with”.

Several participants highlighted specific concerns regarding India as a destination for offshore WIL: “they were just frightened of going to India” and “the institution is frightened to send students to India”. By contrast, focus groups and interviewees emphasised opportunities for students undertaking mobility programs to India being exposed to a “very different work environment, [where] ... the business culture is different”. One interviewee emphasised the “huge opportunities in India to learn”, stating that “there are lots of issues with India and how India operates, but if someone spends some time working in India, that person is prepared for the rest of their lives to deal with anything that comes their way”. Similarly, several interns supported by the Victoria India Internship Program celebrated the opportunity to experience India, embracing the cultural and professional dimensions of their offshore WIL experience.

Higher education institutions and VET providers looking to increase Australia-India WIL engagement in the form of offshore placement-based WIL in India will need to promote India as an option and prepare students well (see Good Practice #1).

Barrier #4: Limited interest in India

Focus groups and interviewees also confirmed that while higher education student

participation in offshore WIL and international study tours has grown in recent years, many students in Australia demonstrate little interest in undertaking offshore WIL in developing countries such as India. VET students typically do not undertake offshore WIL, regardless of the destination country. Interviewees advised that, “it’s really hard to get students to pick India” for offshore WIL. One interviewee observed that “the allure of Europe is much more comfortable for them [as are] ... well-developed South East Asian countries like Singapore, and Hong Kong”. While domestic students may be attracted to a learning experience offshore, for international students studying onshore in Australia, “ultimately [they are] coming to Australia for an Australian experience in an Australian institution. And if they’re pursuing a career path or perhaps a migration outcome, there’s no use or sense in doing a WIL program from [or in] their own country, whether they’re from India or otherwise”. Several interviewees emphasised migration pathways for Indian nationals: “Who are the students who are coming to Australia? They’re mainly coming for migration. ... They’ve come through migration agents, and they are the bulk of [the] students here”.

Higher education institutions and VET providers looking to increase Australia-India WIL engagement in the form of offshore placement-based WIL in India will need to promote India as an option, including familiar Australian and Indian host organisations (see Good Practice #2).

Barrier #5: Availability of hosts

Interviewees consistently reported that India’s internship system has grown considerably in recent years, along with the economy, and higher education and skills systems. One focus group participant cautioned “sending more people to India to fill these spaces, potentially, could cause discomfort for both parties”, as “they don’t need any more students ... from Australia, [as] they’re full with their own”. By contrast, another reported their institution was “talking about India with a huge cohort of students eager to do [offshore] internships”. As indicated elsewhere in this report, it is likely that availability may be best in large organisations based in tier 1 Indian cities.

Speaking generally about Australian industry, focus groups and interviewees consistently reported: “it’s a flooded market”, where “everybody cannot do placement. It’s competitive. It’s resource-intensive ... So, we need to look at different ways that we can get students authentically engaged in ... projects and activities” in Australia and internationally. One interviewee suggested that the introduction of performance metrics for WIL through the Australian Government’s National Priorities and Industry Linkage Fund will exacerbate existing demand/supply tensions:

But it’s a real challenge, that means now, [as] all universities have to have a metric around WIL [they] are going to want to and need to ramp up the type of WIL that they do, which then adds to the competition for placements and universities needing to think about doing WIL differently so that they can still put their hand on their heart and say, ‘Our students had an authentic industry

engaged experience throughout their studies. It just wasn't a six-month placement because it's not doable'.

In addition to increasing authentic, non-placement-based WIL activities, focus groups acknowledged that institutions already limit enrolments in professional programs with mandatory WIL requirements in response to supply/demand challenges.

Higher education institutions and VET providers looking to increase Australia-India WIL engagement will need to promote a range of Australia-India WIL models (see Australia-India WIL models 1-4).

Barrier #6: Lack of inclusivity

Focus groups reported that placement-based offshore WIL is prohibitive for many students. One participant advised, "there are some class issues around comfort with travel and comfort with cultural difference. Being a carer prohibits students from undertaking physical placement in India. Having a disability, a physical disability particularly, is a strong deterrent to students seeking study tours and WIL placements in India". Similarly, several interviewees identified issues associated with gender, race and ethnicity, and sexual orientation: "Anything to do with identity, really ... Students have to be aware that they're going into a place [in India] where these things may not necessarily have been discussed or addressed as much as they would have in, let's say, a setting in Melbourne". Participants also suggested that parents and guardians may be apprehensive about students' interest in undertaking offshore WIL in countries perceived as high risk or culturally conservative, including India.

Higher education institutions and VET providers looking to increase Australia-India WIL engagement will need to promote a range of Australia-India WIL models (see Australia-India WIL models 1-4) to address inclusivity concerns.

Barrier #7: Global health emergency: COVID-19 pandemic

Focus groups, interviewees and survey respondent acknowledged the impact of the COVID-19 pandemic on WIL in recent years. This included transformations to the world of work, the pivot to remote learning and WIL, mobility restrictions limiting students learning and WIL options, and regulatory reforms impacting individual program requirements, pedagogy, and delivery mode.

Looking forward, higher education institutions and VET providers interested in increasing Australia-India WIL engagement will need to promote Australia-India WIL models capable of continuing in the face of emergencies impacting student mobility.

GOOD PRACTICE WIL: CANVASSING THE SCHOLARLY LITERATURE, AND REPORTING ON DOCUMENT ANALYSIS

The document analysis revealed that institutions consistently emphasise quality features of WIL including authenticity, integration, assessment, inclusivity, preparation (for students and host organisations), participation and evaluation (see University of Canberra, 2019 in Table 9). Findings of the document analysis were confirmed by focus groups and interviewees, with one interviewee advising, “what underpins the key features of WIL is that there’s an authentic engagement with industry, it’s for credit, it’s assessed, and it’s aligned to learning outcomes”.

Table 9: Quality Features of WIL

Quality feature	Description
Authenticity	The degree to which the WIL activity is real, and its proximity to the workplace
Integrated with curriculum	WIL is intentionally integrated within a course and is designed to link theory and practice
Assessment	Assessment is authentic, focused on integration of theory and practice, and aligns with learning outcomes
Inclusive practice	All students have equitable access to full participation in WIL
Student preparation	Students require a clear and facilitated induction to WIL
Student participation	Students actively engage with the WIL experience in a manner aligning with professional requirements
Supervisor preparation	Supervisors require a clear induction to their role relevant to the WIL category
Supervisor participation	Qualified academic and industry supervisors actively engage in supervision
Evaluation	Staff, students and industry are active participants in evaluating WIL

Source: University of Canberra, 2019.

This is consistent with literature highlighting good practices in international mobility, generally, and WIL, more specifically (Table 10).

In terms of international mobility, Freeman and Rizvi (2014) found that Australians living and working in Asia benefited from pre-departure and in-country preparation and developing Asian literacy. In terms of good practice relating to WIL, Sachs et al. (2016) identify characteristics of good practice WIL as follows:

- It occurs in and over physical and virtual spaces, online and offline environments, on-campus or off-campus. This inbuilt flexibility meets the contemporary challenges and opportunities of changing workplaces, workspaces, resources and schedules.
- The engine of this kind of experience is relationships. Relationships in the workplace context are formed and solidified through initial and ongoing productive dialogical engagements.
- Learning in the workplace is not just for the academically gifted. It is for all students. It is a philosophy that rewards achievement without disadvantaging difference.
- Organisationally it is:

- o well-governed, resourced and supervised
- o prioritised by the institution and has institutional/faculty/departmental buy-in/investment
- o has its institutional and industry-based champions
- o meaningful and accessible to all stakeholders
- o intentionally linked to and supports learning outcomes, especially around employability. (p. 6)

Atkinson (2016) found that “the keys to successful engagement in [WIL] include clear information, ongoing communication, flexibility with approaches, committed and skilled teachers who support students, engaged students, the involvement of intermediary organisations to organise and facilitate activities, and the commitment of business and education leaders to drive work-based learning and work-integrated learning in their communities and companies” (p. 2).

Osborne et al. (n.d.) also identify good practices, including investing in training workplace mentors, establishing clear expectations for students, creating environments conducive to learning, monitoring working conditions to ensure students are not exploited, and providing students with challenging work. The literature also identifies various policy settings supportive of WIL, such as quality assurance systems, financial incentives for industry (e.g., compensation for hosting students, tax incentives/concessions, training subsidies), and providing sufficient funding for providers.

In one of the few studies regarding offshore WIL, Wake et al. (2017) found that communications students undertaking offshore internships in Asia value information about the host country (including cultural awareness) and their host organisation, as well as information regarding the work placement and learning expectations. Other scholarly literature recommends ensuring students have information about available financial assistance, and assistance with accommodation, visas, and travel plans. Woolley (2014) reports that journalism students undertaking fieldwork in Vietnam performed best when practising skills learned in the classroom and holding the necessary pre-requisites. Skelton and Westner (2018), studying New Zealand-Germany internship capstone projects, report students being “more extended personally and academically” (p. 195), improving their English and German language skills, and achieving smoother graduate transitions.

The document analysis conducted for this project revealed that institutions may specify mandatory selection criteria for offshore hosts, and that this documentation may reflect good practices. For example, the Griffith University Work-Integrated Learning at Griffith policy (2018) identifies factors that inform the selection of offshore WIL hosts:

- the outcomes from a risk assessment (e.g., existence and implementation of emergency and incident reporting procedures);
- the outcomes from a work site evaluation;
- alignment of [university] and the host organisations’ values;
- that the host organisation is of a reasonable size;

- the outcomes from the staff interview with the intended placement supervisor;
- capacity of an organisation to fulfil requirements of student placements including a proposed outline of the student's role and duties over the duration of the placement, ensuring that both the student and the [host organisation] derive value from the arrangement; ...
- past WIL student experiences. (pp. 2-3)

Further, their Domestic WIL Placement Guidelines state that “the [host organisation] must have a system for risk management that includes identification of hazards, assessment and control of risks, a system for reporting, recording and investigation of accidents/incidents and risk management procedures and training for staff); documented safe working procedures (e.g., Standard Operating Procedures). For small businesses of fewer than 5 employees, informal evidence of safe work procedures is acceptable; staff who are trained in basic first aid; and personal protective clothing/equipment for the student (where appropriate)” (2020, p. 2). Good practices elaborated in the WIL literature and institutional policy documents analysed for this project may be summarised as follows:

Table 10: Good Practices in WIL (Higher Education and VET), Generally

For students (generally)	For students undertaking offshore WIL	For host organisations	For higher education institutions and VET providers
Clear information	Information about the host country (including cultural awareness)	Clear information	Physical and virtual WIL, online and offline, on-campus and off-campus
Ongoing communication	Information about the host organisation, the placement and learning expectations	Ongoing communication	Relationships with host organisations
Engaged students	Able to use offshore WIL to practise, in a real-world environment, skills learned in the classroom	Commitment of leaders to drive WIL	Well governed, resourced, prioritised, with champions
Clear expectations	Students have completed necessary prerequisites	Investing in training workplace mentors	Meaningful and accessible, linked to learning outcomes
	Information about financial assistance available, and assistance with accommodation, visas, and travel plans	Creating environment conducive to learning	Flexibility with approaches
		Financial incentives for industry	Committed and skilled teachers who support students
		Alignment between industry and education institution's values	Commitment of leaders to drive WIL
		Providing students with challenging work	Involvement of intermediary organisations to organise and facilitate activities
		Favourable risk assessment and management, work site evaluation, staff interview and past student WIL experiences	Monitoring working conditions to ensure students are not exploited
		Reasonable size	Sufficient funding for providers
		Capable of fulfilling requirements (e.g., proposed outline of student's role and duties)	Alignment between industry and education institution's values
		Safe work procedures and environment, including personal protective clothing/equipment for the student	

Source: Woolley, 2014; Atkinson, 2016; Sachs, 2016; Wake et al., 2017; Griffith University, 2017; Osborne et al., n.d.

Outcomes: Higher education WIL and VET work-based learning

While this project did not seek to analyse outcomes of Australian or Indian WIL in terms of academic performance, graduate employability or employment, the development of Australia-India WIL models was informed by a review of the scholarly literature. This revealed five key findings in terms of outcomes. First, students benefit from participation in international education involving mobility (Roy et al., 2019; Netz, 2021). Second, students benefit from participation in WIL, generally, including higher education students (Sanahuja Velez & Ribes Giner, 2014; Smith et al., 2014) and VET students (Bahl & Dietzen, 2019).²⁴ Third, some studies suggest students benefit more from participation in placement-based WIL relative to simulation (Smith et al., 2014) or online WIL (Jeske & Axtell, 2014), notwithstanding competition for WIL placements (Kay et al., 2018). Countering this, some studies suggest that for disadvantaged students, online WIL is more inclusive than placement-based WIL (Bell et al., 2021). Fourth, students benefit from participation in online WIL (Bell et al., 2021); however, concerns regarding online WIL impacting learning have been reported (Jena et al., 2020). Finally, some studies suggest, while students benefit from placement-based WIL, they seek online WIL (and other alternatives) recognising the increasing competition for placements (Kay et al., 2018), and/or the impact of COVID-19 restrictions (Dean & Campbell, 2021).

Good practices in offshore WIL in India: Reporting our research

Complementing this body of research regarding quality and good practices of WIL, generally, our research builds an evidence base from the interviews and focus groups to reveal good practices related to offshore WIL, generally, and with India more specifically.

Good practice #1: Preparation for offshore WIL in India

Good practice is preparing students well for offshore WIL in India. Interviewees emphasised: “if students are actually going offshore, they have to [have] two days or three days of preparation. So, it’s about increasing their awareness of their rights and responsibilities, who to report to from their end so they’re not going in blind, understanding what exploitation is, all of that”. One interviewee emphasised student agency: “Even before a student goes into the WIL experience, they need to be going through a lot of things so that they have the agency to make the most of the WIL experience”. Another recommended “cultural training ... around ... the customs, the dressing, how to speak to people within [different] cultures, so cultural preparedness. And [understanding that] it’s a very, very different work environment”. Focus groups concurred, stating that they “would very much like to have a much more systematic process around preparing ... students for WIL activities” undertaken offshore.

Higher education institutions with South Asia Studies are well placed to provide such

24. It is notable that some studies contest this, with Palmer et al. (2018) observing that many studies question the relationship between participation in WIL and outcomes (i.e., graduate employability and employment).

preparation, including language studies and intercultural literacy. One Australia India Institute intern reported in their testimonial being inspired to undertake offshore WIL in India through their South Asia Studies program, while another reported on their return, “language ability would have opened up more opportunities, given greater insights and improved my experience”.

These findings are consistent with studies of international student participation in WIL in Australia, with Jackson (2017) recommending:

Preparation could be in the form of pre-placement modules, videos, one-to-one discussions and/or talks from previous international students about their own experiences. A broad base preparation module for completing placements could be contextualized by careers and international offices for managing specific cultural issues. (p. 354)

Studies of internships in India concur, with Ganguli (2019) recommending, “working atmosphere, benefits, safety and security (especially for girls) should be paid adequate attention so that the internship experience will be more effective” (p. 87).

One interviewee cautioned, “I don’t think there’s any way you can prepare students for [going to India]. And you can never prepare students for all cultural differences. But what we can do is we can help students in building resilience in developing those skills and reflecting on experiences. What is happening? How do I develop my agency?”. This interviewee observed further, “there’s no point in trying to teach everything to students, because everything keeps changing. What’s important is to build that resilience, to build that self-confidence in students, how to reflect on these experiences, and not become a victim, but to navigate through the situation. Because, regardless of whether they work in India, or Australia, or any other part of the world, they will experience it”.

Good practice is preparing host organisations offshore for WIL. Interviewees emphasised the importance of pre-placement briefings regarding expected health and safety obligations, expected learning outcomes, supervision and evaluation requirements. Good practice also involves negotiation of robust, signed agreements with host organisations, particularly for offshore WIL: “So we need to send off online modules [and] materials, get signatories to our WIL agreements ... [that] very clearly spell out schedules of work, who’s checking in, what they’re expected to do so it is very transparent. Because we’ve all had horror stories of students being exploited [and] sexually harassed”. Thorough pre-placement preparation is an essential risk mitigation strategy for higher education institutions and VET providers with students going offshore for WIL.

Good practice #2: Familiar Australian and Indian host organisations

Good practice is matching students with familiar organisations for offshore WIL in India.

One interviewee reported: “if you’re talking about Australian companies operating in India, they are favoured both by Australian students because they’re safe, and they’re favoured by Indian international students, or any other international student because they’re familiar. They count as Australian work experience”. Familiar organisations in India may also be Indian multinationals (e.g., Infosys). For some students, initial opportunities may involve onshore WIL with Indian organisations: “opportunities to work with say Indian companies that are actually onshore in Australia as opposed to [offshore in India]. And then that will be a good starting point”.

Good practice is working with known Indian higher education institutions, their international offices, returned Alumni and diaspora. Focus groups recommended leveraging MOUs: “So, rather than ... going directly to companies [in India], we go through our [Indian higher education] institutional partners and they connect the companies to us. And that makes it easier to build trust”. This strategy relies on the existence of well-established Australia-India education connections.

Such arrangements could be part of a package of reciprocal mobility activities, with focus groups asking, “How do we then build ... partnerships with other universities [involving] a collaborative and reciprocal ... model”, in part, “because we don’t want to be competing with them to deal with the same Indian companies”. One interviewee suggested institutional partners could play an important pastoral care role for students undertaking offshore WIL in India, recommending “I mean, you get your degree, obviously, from an Australian university. But it makes sense to have a local place that you can report to, that is sort of your guardian, while you are there. Not necessarily in your academic work, but just being there for you, in case you need support”.

Others recommended co-opting Indian alumni: “we’d like to really make use of all the alumni that we have back home in India to spread the word about [our institution] and get access to more WIL opportunities for our students. I think that’s something we haven’t tapped into”. This strategy relies on the existence of well-established Australia-India alumni strategies. Others emphasised the importance of Indian diaspora in Australia providing points of connectivity: “I think Indian diaspora has a large role to play, because my colleagues asked me, ‘can you get some [host] organisations?’. And ... I called my colleagues in India”.

Good practice when working with India involves scale. Interviewees reported that some types of WIL are particularly amenable to scaling up: “projects are predominantly the most scalable way to do [WIL]. So, you have [one] company with a project, and ... you may have 100 students who work in groups of five, and they’re all working on the same project. That’s more scalable”. Much industry in India operates at scale. One interviewee advised, “because the Indian companies are so used to doing everything in bulk, right. When you are going and asking them for one internship or two internships for this or that, it just becomes like they have to actually start thinking, ‘oh my God ... How do I cope with this?’”. They recommended, “Saying, okay, I’ll have 100 students” at one company, providing “a broad ... breakup of the segments they are interested in. I have 15 who are interested in accounting

and finance, 10 in marketing, 10 in sustainability, or something like that. ... And say, 'we would like to place all of them within [your organisation]. Is that a possibility?'".

Another option involves having more than one host organisation, each taking on several students: "I think if we work with the right partners in India, even 100 and 150 students don't have to necessarily go into the same company. But having someone in India that is able to look at these 150 students and go, 'Right, we can place five here, five here, five here, five here', because that scale can be achieved as well". This strategy could leverage collaborative efforts by Australian higher education institutions to jointly place many students offshore in WIL in India.

Good practice #3: Prioritisation of niche industry sectors

Good practice is prioritising niche industry sectors for offshore WIL opportunities. Focus groups and interviewees recommended identifying Indian host organisation's strengths relevant to Australian higher education and VET program needs. Participants nominated information technology, cyber security, sustainable development, engineering, management (e.g., finance, marketing, consulting and strategy, company secretary), media and entrepreneurship. Focus groups observed, "I guess one of the things that would be a big sell is the things like engineering, IT, in the new technologies where India is absolutely burgeoning and where they're leading, taking a disciplinary lens to opportunities might be a sensible thing to do, that might be a clever way of driving demand". Several focus groups recommended avoiding professional programs in the first instance to overcome issues relating to prescriptions concerning WIL location.

Good practice #4: Offering offshore WIL in India in tandem with prioritised internationalisation efforts (i.e., study centres and study tours)

Good practice is working with prioritised institutional activities. Focus groups and interviewees consistently emphasised the resource intensive nature of coordinating, managing, and overseeing offshore WIL, while concurrently acknowledging the tremendous outcomes of offshore WIL. Several clearly indicated alternative priority areas, particularly considering the pivot to offshore online learning, and financial constraints experienced in recent years.

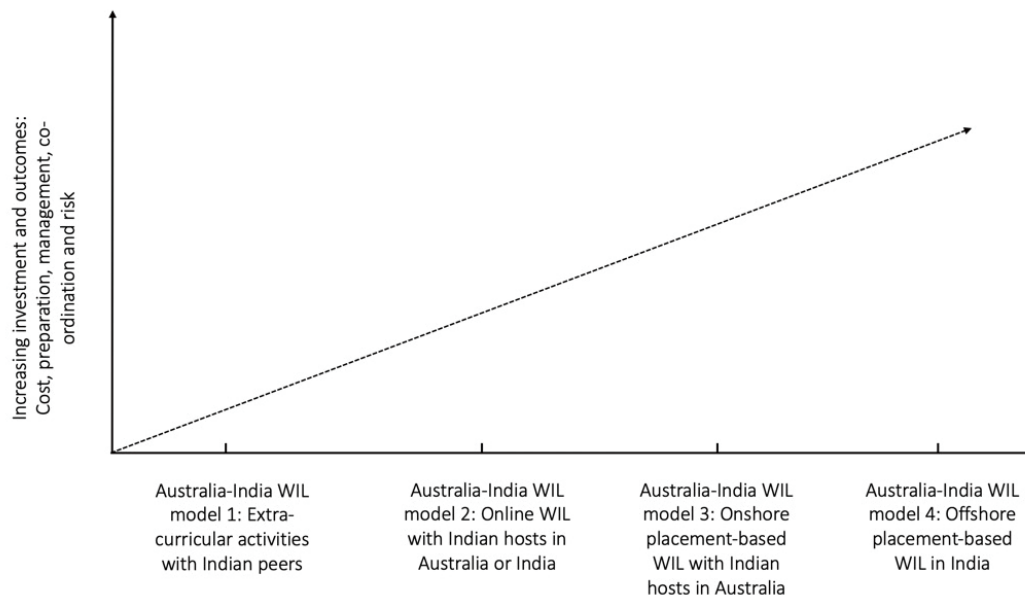
Several higher education institutions reported prioritising offshore study centres (including in India), rather than offshore WIL. These participants generally noted, however, that students could piggyback participation in offshore study tours (or similar immersion initiatives) with short offshore WIL activities. Several suggested "aligning WIL with other programs that are also going on, worked very successfully". Another reported, "so, 'study tours with embedded WIL' is quite an interesting way to do it. There might be project-based activities that [students] do in-country as they're doing those study tours". One interviewee reported running successful immersion initiatives: "So, [the students] visit different cities,

different companies, ... [different] centres and see what's happening there. It's an India immersion program. It's also run virtually now".

Relationships between various factors

Our research revealed a relationship between investment and Australia-India WIL models. Focus group participants and interviewees consistently reported offshore WIL in India being more resource intensive – for students, institutions and host organisations – than extra-curricular activities and online WIL with hosts located in Australia or offshore. This investment in offshore WIL includes student and host organisation preparation, management and co-ordination, and cost (for the student, higher education institution/VET provider, and host organisation). The scholarly literature suggests that in many (but not necessarily all) instances, outcomes also increase in a manner depicted in Figure 4, below.

Figure 4: Relationship Between Investment and Australia-India WIL Models



AUSTRALIA-INDIA WIL MODELS TO INCREASE AUSTRALIA-INDIA WIL ENGAGEMENT

This study has collected data from multiple sources and provided the basis for detailed analysis of Australia-India WIL engagement. This approach was particularly important given the radical, rapid transformations that have occurred, globally, to work, learning and therefore WIL, in recent years. Analysis of this extensive data-set – from scholarly literature, student participation data, institutional policy documents, interviews and focus groups – provided the basis for the development of four Australia-India WIL models (Table 11) that are each discussed in turn, in the following section.

These models can accommodate different types of WIL (i.e., hackathons, competitions, grand challenges, industry certification, projects, case studies, placements, fieldwork, internships), modes (i.e., online, placement-based, hybrid), and spatial aspects (i.e., onshore in Australia, in India). They can accommodate host organisations located onshore in Australia, and offshore in India. Collectively, the models can accommodate a time element (as a proxy for commitment), long considered important for sustainable partnerships with India. They illustrate a trajectory of engagement of higher education and VET students, institutions, and host organisations in activities.

Over time, parties progressing along this trajectory – from Australia-India WIL model 1 to Australia-India WIL model 4 – could meaningfully increase Australia-India WIL engagement by building multi-layered, sustainable relationships based on reciprocity and mutual advantage. This would involve building relationships with host organisations in India, leveraging existing partnerships with Indian institutions, adopting a range of approaches, scaling-up provision, and the successful recruitment of students and host organisations. These models are elaborated in turn, below.

Table 11: Models to Increase Australia-India WIL Engagement

Australia-India WIL model 1	Australia-India WIL model 2	Australia-India WIL model 3	Australia-India WIL model 4
Extra-curricular activities with Indian peers	Online WIL with Indian hosts in Australia or India	Onshore placement-based WIL with Indian hosts (in Australia)	Offshore placement-based WIL (in India)
- hackathons - competitions - grand challenges - industry certification	- projects - case studies	- placements - fieldwork - internships	- placements - fieldwork - internships Stand-alone or in concert with study tours
In Australia (or India)	In Australia (or offshore online)	In Australia	In India

Australia-India WIL model 1: Extra-curricular activities with Indian peers

The first model involves higher education and VET students participating in extra-curricular activities such as hackathons, competitions, and grand challenges with Indian peers. Alternatively, students may pursue industry certification through global, Australian, or Indian companies relevant to their studies, employment aspirations or other interests (e.g., Atlassian, Infosys). Students may also pursue extra-curricular activities with youth organisations (such as AIESEC) that have international outlooks. For students, institutions and hosts, this model would typically involve the lowest level of investment in terms of participation, preparation, management, and co-ordination, noting that costs for industry certification vary (from low to high).

Interviewees reported that students are increasingly participating in hackathons and competitions, with one stating, “We noticed a huge growth in hackathons”. Students also already participate in grand challenges, where they “go through [a] program and present at the end, [and] pitch their solution to whatever the grand challenge is that [was] set”.

Focus groups advised that such extra-curricular activities can readily “build teams ... between India and Australia”. Others observed, “the whole hackathon thing is really good for industry and community because it’s light touch. [For hosts], that might be their first entrée into a university, and they go, ‘Well, I like this’”. Focus group participants from the VET sector suggested such activities may be particularly appropriate for VET providers and students not traditionally involved in outbound international mobility: “if we were to [pursue WIL with India] it would be in that enrichment space, so it would be above what we normally deliver”.

Another interviewee recommended that, “in the VET sector, they need to identify why would it benefit anybody to actually have any interaction across borders. ... So, the problem is the VET sector has not understood at the deeper level, the global connectedness of their programs and their courses. They’ve got tunnel vision. ... And I think that would actually help ... the VET sector, and it’ll revolutionise the VET sector, but also industry in Australia”.

In terms of industry certification, focus groups advised, “big companies like IBM, Google, TATA, Infosys ... often run their own modules, their own courses to orient ... graduates to be able to work on their particular platform”. Similarly, participants supported students and graduates pursuing industry certifications such as Microsoft Azure or Amazon Web Services for cloud computing, as they “would probably value add for ... students locally as well as internationally”.

One interviewee reported, “almost every Australian university is moving towards stackable [components]”, and asked, “How do we get students to reflect on all these experiences, and then that gets articulated into their program, or their degree”. One interviewee specifically recommended that institutions “take these [extra-curricular] models and ... embed them into curriculum” to maximise outcomes for students.

VET providers and higher education institutions could encourage students to participate in extra-curricular activities, and in some instances, value-add by recognising these endeavours in curriculum. Such activities involving Indian peers will increase Australia-India WIL engagement, for comparatively minimal investment.

Australia-India WIL model 2: Online WIL with Indian hosts in Australia or India

The second model involves higher education and VET students participating in online WIL with Indian hosts in Australia or India (e.g., TATA Consultancy Services, Tech Mahindra, NASSCOM Foundation, Cognizant, Wipro, Infosys). This model could also involve Australian hosts operating in India (e.g., Atlassian, Tourism Australia, Australian banks).

As one interviewee reported, online WIL can involve “doing authentic, real projects for companies who have set out a challenge: ‘Here’s our problem’. The students go off into groups, do [their] analysis, do some research, come back, and do a presentation”. The various ways in which institutions and host organisations deliver online WIL are now well

established and documented (see Kaider et al., 2021a; 2021b; 2021c).

Some higher education institutions have long standing experience administering online WIL, with one interviewee reporting, “I was trying to push for online WIL 10 years ago; that we should be doing more of it, because it’s scalable. It’s authentic. I mean, look at the way we work!”. Focus groups agreed: “A lot of the ‘innovative’ models and online WIL are not new at all ... For years and years [we] ... have had online WIL across [several] countries”. This is consistent with the scholarly literature, with Jeske and Axtell (2016) finding that, “as job forms have evolved, so have the forms of internships” (p. 55).

Participation in online WIL necessarily increased in COVID-times as global, national, and local mobility restrictions transformed the worlds of work and learning (Bowen, 2020). One interviewee advised, “virtual placements are an excellent remedy to ... barriers” to placement-based WIL, while another observed the impact of changes in recent years on parity of esteem of different WIL modes: “in this virtual workplace that we all [now] inhabit, certainly, virtual [WIL] is not seen as second rate anymore”.

Many focus groups and interviewees were positive about the opportunities presented for students to engage online with hosts in Australia and overseas: “It’s a great way to do [WIL]. It’s scalable. It gives your students, if you open up some projects, interdisciplinary opportunities. I can have a mix from first year undergrads to post grads. ... The mix that you get from right around the world and from different areas is fantastic!”. Others reported benefits for hosts: “I think it’s moved a long way with many companies thinking now, ‘this is the only way we will do WIL with university students because it’s provided a greater pool of students from anywhere in the world. ... We can do this online, and not only that ... We can do this globally’”. One interviewee observed that “virtual WIL opportunities have created far more equity in the WIL space”, while acknowledging barriers for “smaller, medium-sized enterprises, especially rural and remote [enterprises] in India ... [where] the accessibility of virtual [operations] can sometimes be a barrier”.

Some focus groups reported mixed responses: “Anecdotally, there’s lots of students who love the virtual [WIL] and there’s lots of students who really miss being in a [workplace] environment. I guess it’s going to be a bit of a mixture”. Some focus groups cautioned, “the students don’t like online”, with one participant suggesting “I think everyone has online fatigue 18 months into this [pandemic]”.

Despite some reservations, online WIL with Indian host organisations in Australia and India will be pursued by institutions keen to increase Australia-India WIL engagement.

Australia-India WIL model 3: Onshore placement-based WIL with Indian hosts (in Australia)

The third model involves higher education and VET students participating in onshore placement-based WIL with Indian host organisations in Australia. This model is consistent with traditional placement-based WIL that has long been offered. As interviewees

confirmed, “whilst virtual internships have been incredibly efficient [while mobility restrictions were in place], ... the richness of in-person experiences is very hard to replicate”.

The pivot here involves increased Australia-India engagement by placing students with Indian hosts in Australia. One interviewee observed, “for students who have a practice-based component to their qualification, ... we know that Indian companies are very experienced in offering work experiences and internships. They’re familiar with them, they would gain access to good quality, well-educated students from Australia”. This model would also provide opportunities for institutions to build vitally important connections with Indian host organisations, that could be leveraged for offshore placement-based WIL in India.

Onshore placement-based WIL with Indian host organisations in Australia could readily be pursued by institutions keen to increase Australia-India WIL engagement or simply connect with organisations with recognised expertise (e.g., engineering, information technology).

Australia-India WIL model 4: Offshore placement-based WIL in India

The fourth model involves higher education and VET students participating in offshore placement-based WIL in India. Offshore WIL could be undertaken as a stand-alone exercise, or in concert with study tours. For students, institutions and hosts, this model would typically involve the highest level of commitment and investment in terms of participation, preparation, management, and co-ordination. Arguably, in many (but not all) instances, outcomes achieved through this model would be the highest.

Our research revealed that some higher education institutions have experience placing students offshore for placement-based WIL, and a small number of focus group participants reported successfully placing students in India for programs focused on fashion, social work, journalism, business, economics, law, and health sciences. One focus group participant reported, “a lot of our students do the engineering professional practice within companies in India”. In some instances, offshore placement-based WIL activities are already piggybacked with other learning opportunities, most frequently international study tours. In the absence of further targeted funding, focus groups consistently reported a preference for international study tours (and offshore study centres) rather than offshore placement-based WIL.

Many reported, “offshore WIL in its traditional form with students going away on placements for activities, we’ve never been particularly strong in this area. It’s not been a massive focus”. One focus group participant identified numerous barriers to this model, and noted, “we’re each ... [still] tackling some of these issues”, particularly for designated high-risk destination countries such as India. This participant strongly recommended that “guidelines ... be prepared that would support universities”, requesting, “if we are

going to focus on engaging with India, could we have some support so that we're not all individually navigating some of the legalities and technicalities, so that we can get on with the relationship building and supporting our students?". While our research provides an evidence base for Australia-India WIL models, further work needs to be undertaken to produce practitioner-oriented resources to support institutions operationalising such opportunities.

Such a handbook, or WIL guide, could draw on research in this report, and provide material on the Australian and Indian regulatory frameworks governing WIL, WIL teaching, assessment and supervision, as well as WIL coordination, monitoring and evaluation. Particular attention could be given to operational matters concerning Australia-India cross-border mobility, and online WIL activities.

Clearly, while international mobility restrictions were in place in recent years this India WIL model was not possible, other than for a small number of offshore online students studying in India. Participants reported some considerable uncertainty about the path forward: "It will be interesting to see whether ... COVID has sort of intimidated people about international travel and to what extent. I don't know, really. It could go one way or the other. People could be busting to go!". Several were optimistic about offshore WIL in India: "I think also, India being the country that it is, and how quickly it's developing ... I feel like for [offshore] WIL, that could be a massive opportunity. ... I think India makes perfect sense to be the next one ... for [our university]". Interviewees reported interest in delivering offshore placement-based WIL opportunities, with one stating, "I think for our students, ideally I would love for them to be able to travel again ... and enjoy the experience of being in a different location and immerse themselves".

Despite uncertainty, and somewhat limited experience sending students to India for placement-based WIL, focus group participants, interviewees and Australia India Institute interns reported positive outcomes from their India learning experiences. Intern testimonials confirm the various benefits of this model, additional to students meeting their course requirements. For one intern, the experience of completing a placement-based WIL activity in India made them "realise the importance of the India-Australia relationship going forward". Another reported, "I am open to opportunities to continue developing my knowledge of, and connections with, India. It is a fascinating place, and also an important country on the world stage". Australia India Institute interns also reported observing that, India "is a unique country and one that we, as Australians, should be watching closely and attempt to understand better". Another came to appreciate the "common concerns, challenges, and prospects that face Australia and India, and highlighted that there is much we can learn from one another".

This Australia India WIL model has much to commend it to students, institutions, host organisations and governments. Offshore placement-based WIL could likely be pursued by at least some keen to increase Australia-India WIL engagement. In the first instance, this may involve universities in receipt of NCP student grants for Australia-India student mobility; however, in time, more universities and students could pursue this model of engagement.

CONCLUSION

Increasing Australia-India engagement is of strategic importance to the Australian Government, and of interest to many higher education institutions and VET providers. Research presented in this report, undertaken by the Australia India Institute, has examined options to increase bilateral engagement by focusing on four key matters.

First, as this research reimagines global WIL opportunities for students enrolled with the Australian higher education and VET systems, this report charts WIL in Australia. Consideration has been given to participation, policy and regulatory frameworks, and key features of WIL. This evidence base has proved vitally important in informing our understanding of the formal parameters bounding WIL opportunities for students in Australia, offshore and online.

Second, as this research reimagines opportunities for students to engage with Indian host organisations or peers, this report broadly charts internships in India. This includes participation, regulatory frameworks and key features. This evidence base, while somewhat limited as the body of research regarding India's internship systems is still emerging, has informed our understanding of what Indian host organisations may be familiar with when looking for interns. This includes students enrolled with institutions outside India's higher education and skills development systems.

Third, our research involved an analysis of barriers to WIL opportunities for students of the Australian education system in India, and good practices concerning offshore WIL in India. Importantly, our findings regarding barriers and good practices have informed the shape of opportunities reflected in the Australia-India WIL models developed through this project.

Finally, this material provided the evidence base to develop four India WIL models aimed at increasing Australia-India WIL participation. The task is now to provide these opportunities to students of Australia's VET and higher education institutions.

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APPENDIX 1 – Extract from Australian University Institutional Policies

Few Australian university or NUHEP institutional policies governing WIL explicitly concern offshore WIL; however, there are some notable exceptions as the following two extracts illustrate.

The University of the Sunshine Coast Work Integrated Learning (Placement) – Procedures specifies the following:

- 7.11 Overseas placements
- 7.11.1 An overseas placement must be assessed as identified ... The placement coordinator must also ensure that:
 - (a) there is alignment between the international placement and the intention and learning outcomes of the program/course outline;
 - (b) a budget has been allocated for a site visit (if required) and appropriate supervision;
 - (c) a review has been undertaken of the location regarding any professional accreditation requirements;
 - (d) a University contact is available for the student throughout the placement;
 - (e) travel warnings for the placement location have been checked prior to the student's departure; and
 - (f) a formal communication plan has been developed and is stored in an appropriate records management system.
- 7.11.2 A student seeking to undertake an overseas placement may initially be required to attend an interview with the relevant placement coordinator.
- 7.11.3 Each School maintains through [the university placement database] a register of its students undertaking placement activities overseas. (2021, p. 6)

The Flinders University Work Integrated Learning (WIL) Procedures specify that, in terms of academic support, the Topic Co-ordinator must, prior to any WIL activity:

- a. Confirm that the overseas WIL activity meets the expected learning outcomes and any professional accreditation of the course.
- b. Provide evidence that an organisational risk assessment has been undertaken ... to ensure the integrity of the activity and student safety and wellbeing.
- c. Where required, alert the ... of the need to allocate a budget for the overseas activity which would include an outline of how logistics and appropriate supervision will be managed for the duration of the activity.
- d. Nominate a [university] contact to be available for the student throughout the activity and specifically in the case of an emergency.

- e. With [the university] develop a risk management plan and formal communication plan to be stored in the University's record management system. (2019, p. 7)

In terms of administrative support, the Flinders University Work Integrated Learning (WIL) Procedures requires that the university support international logistics and planning, obtain a signed WIL Letter of Agreement (between the university and the host organisation), ensure students have registered for travel insurance, confirm compliance requirements in the university's placement management system, and check travel warnings. Students are responsible for the following:

- a. Ensure all requirements for enrolment have been met.
- b. Attend an initial interview if required ...
- c. Ensure any international travel related arrangements such as flight and accommodation bookings have been met.
- d. Submit evidence against specified criteria to assist with risk management, where requested.
- e. Register for University insurance via the student travel insurance portal.
- f. Record and verify in the University's system for placement management all essential compliance requirements applicable for the overseas WIL activity.
- g. Ensure all details for an emergency contact person in Australia are current and correctly recorded in the Student Management System.
- h. Register with Smart Traveller and provide the WIL operational support team the confirmation registration email.
- i. Complete and submit the issued Pre-Departure checklist. (2019, p. 8)

The Curtin University 2015 Fieldwork Preparation Checklist – International Fieldwork, overleaf, illustrates some of the complexities for institutions and students involved in offshore WIL.

Fieldwork Preparation Checklist - International Fieldwork

<input type="checkbox"/>	I have read and understood the Curtin University Fieldwork Education Policy (available online at http://policies.curtin.edu.au/policies/viewpolicy.cfm)
<input type="checkbox"/>	I have read the Fieldwork Manual and understand what I can expect to gain from successfully completing this fieldwork activity, as well as the roles and responsibilities of each stakeholder involved in fieldwork.
<input type="checkbox"/>	I agree to follow Faculty/School procedures for fieldwork.
<input type="checkbox"/>	I have submitted the Health and Legal requirements stipulated by my Faculty/School at the recommended time prior to the allocation of fieldwork placement.
<input type="checkbox"/>	I have read and understood Travel Procedures for Students and completed the required Travel Approval Form (available at http://policies.curtin.edu.au/policies/viewpolicy.cfm).
<input type="checkbox"/>	I have recorded the name and contact details of my Curtin Fieldwork Coordinator.
<input type="checkbox"/>	I have confirmed the following details of my fieldwork placement : host site address, name and contact details of the Fieldwork Partner Supervisor; and scheduled dates and times I need to attend my fieldwork activity.
<input type="checkbox"/>	I have contacted the Fieldwork Partner Supervisor prior to commencing fieldwork if required to do so.
<input type="checkbox"/>	I have familiarised myself with the host organisation (e.g. core business, unique cultural aspects of the workplace).
<input type="checkbox"/>	I will comply with clothing, uniform, and personal protective equipment requirements of the fieldwork site, or if none will ensure my dress standard is appropriate to the site's context.
<input type="checkbox"/>	I have read the Curtin Student Charter and the Professional Code of Conduct and/or Standards for my discipline and/or fieldwork setting; and agree to be punctual and behave professionally and ethically during fieldwork.
<input type="checkbox"/>	I will complete fieldwork orientation, preparation or pre-briefing sessions, including university and site-based inductions, prior to the commencement of fieldwork.
<input type="checkbox"/>	I have been made aware of any risks associated with my fieldwork, and strategies to minimize them.
<input type="checkbox"/>	I have advised Disability Services and/or Fieldwork Coordinator prior to placement if I require "reasonable adjustments" to fieldwork due to disability or medical condition(s).
<input type="checkbox"/>	I have arranged family and personal commitments prior to commencing fieldwork and expect to complete all days and hours to enable me to meet the fieldwork requirements of my course.
<input type="checkbox"/>	I am aware that I need to notify my Fieldwork Partner Supervisor and Curtin Fieldwork Coordinator if I expect to be absent from my fieldwork.
<input type="checkbox"/>	My family /next of kin have contact details of my host site AND Fieldwork Coordinator in case of emergency.
<input type="checkbox"/>	My next of kin details in OASIS are correct and my contact details are up-to-date.
<input type="checkbox"/>	I am aware of my obligation to promptly report incidents and hazards during my fieldwork, to both the host site and Curtin , and I am familiar with the procedures to follow in the event of an incident.
<input type="checkbox"/>	I have identified my own personal learning goals for this fieldwork activity and will discuss them with my Fieldwork Partner Supervisor at the commencement of fieldwork.
<input type="checkbox"/>	I am aware of the assessment requirements associated with my fieldwork.
<input type="checkbox"/>	I am aware that Curtin Counselling Service (08 9266 7850 or 1800 651 878- free call number) provides support during fieldwork if I have issues that affect my fieldwork activity.
PRIOR TO DEPARTURE FROM PERTH	
<input type="checkbox"/>	I have ensured flights are booked for correct days and times.
<input type="checkbox"/>	I have completed the relevant visa application.
<input type="checkbox"/>	I have printed a copy of my passport and itinerary to take with me
<input type="checkbox"/>	I have provided my family/next of kin a copy of my itinerary, passport and emergency contact numbers of both host site and Fieldwork Coordinator

<input type="checkbox"/>	I have provided copies of the following documents if they have been requested of me: <ul style="list-style-type: none"> * Passport * Current vaccination status * Working With Children Check * Visa * Travel itinerary * National Police Clearance
<input type="checkbox"/>	I have registered my travel with DFAT/Smart Traveller at smartraveller.gov.au (including post placement travel)
<input type="checkbox"/>	I have declared any post placement travel plans and submitted any non-Voyager Travel booked itinerary to the relevant Faculty Travel Facilitator before departing Perth AND informed my Curtin Fieldwork Coordinator
<input type="checkbox"/>	I have obtained a International SOS Card to take with me with me and agree to follow the Communication Plan should an emergency arise during my fieldwork placement (see Emergency Assistance)
<input type="checkbox"/>	I have reviewed relevant country specific information, including unique cultural aspects of the placement
<input type="checkbox"/>	I have reviewed Curtin University's Insurance details
<input type="checkbox"/>	I have identified a discipline specific support person to assist me and will inform my Fieldwork Coordinator
<input type="checkbox"/>	I have set up a regular contact schedule with my Fieldwork Coordinator (e.g. phone calls, Skype or emails)
<input type="checkbox"/>	I have access to Talent Release Forms (to gain approval to use photos or videos of people involved in fieldwork from the host site or individuals from host countries)
<input type="checkbox"/>	I have a card and/or a small gift to give to my host site to say thank you
ON ARRIVAL AT HOST SITE	
<input type="checkbox"/>	I will email my family/next of kin AND Fieldwork Coordinator to let them know I have arrived safely
<input type="checkbox"/>	I will give my host site supervisor my emergency contacts details for family/next of kin in Australia
<input type="checkbox"/>	I will set up local internet and phone if my host site is located overseas
<input type="checkbox"/>	I agree to attend the host site induction and cover (or ask about) : <ul style="list-style-type: none"> * Health and safety policies * First aid arrangements * Details of the health and safety representative * Emergency and evacuation Procedures * Incident reporting
<input type="checkbox"/>	I agree to conduct a risk assessment of both my host site and accommodation and return these by email to my Fieldwork Coordinator.
PRIOR TO DEPARTURE FROM HOST SITE	
<input type="checkbox"/>	I agree to maintain contact with my Fieldwork Coordinator by Skype and/or email, as arranged
<input type="checkbox"/>	I agree to present a thank you card and/or small gift to the host site
<input type="checkbox"/>	I agree to collect all signed Talent Release forms from people I have photographed or videoed
<input type="checkbox"/>	I agree to transfer all photos or relevant documents to a hard drive to give to the relevant department on my return.
END OF PLACEMENT	
<input type="checkbox"/>	I agree to email my Fieldwork Coordinator once I arrive back in Perth
<input type="checkbox"/>	I agree to submit any assessments as required
<input type="checkbox"/>	I agree to submit all completed Talent Release forms to the relevant department
<input type="checkbox"/>	I agree to make an appointment with the counselling sessions for a post-placement debrief (if necessary)
Student name and student number	
Signature	
Date	
Curtin Fieldwork Coordinator name and staff number	
Signature	
Date	

APPENDIX 2 – Interviewees and Focus Group Participants

<p>Focus groups 1-3: Involving participants from Australian universities (24) and university representative associations (2). In total, focus groups 1-3 involved 26 participants from 20 Australian universities.</p>	<p>Professor Linda Taylor, University of Western Sydney Professor Liz Johnson, Deakin University Dr Ameeta Jain, Deakin University Professor Christy Collis, University of Southern Queensland Rongyu Li, University of Queensland Dr Dino Willox, University of Queensland Laura Jeffress, University of Queensland Monty Singh, Southern Cross University Associate Professor Venkat Yanamandram, University of Wollongong Associate Professor Narelle Patton, Charles Sturt University Associate Professor Judith Smith, Queensland University of Technology Associate Professor Leanne Piggott, University of New South Wales Avanti Redkar-Sachdeva, Monash University Sharon Cook, Monash College Leoni Russell, RMIT University Katy Dolman, University of Adelaide Jock Boyd, Torrens University Dr Mark O'Dwyer, Torrens University Angela Powell, Macquarie University Tracy Bagley, James Cook University Kahlene Michalanney, Flinders University Karen Robinson, Griffith University Mira Skoric, University of Technology Sydney Dr Lea Campbell, University of Melbourne Dr Peter Bentley, Innovative Research Universities Michael Cornish, Group of Eight</p>
<p>Focus group 4: Involving participants from Australian non-university higher education providers (2) and representative associations (1). In total, focus group 4 involved three participants from two Australian NUHEPs.</p>	<p>Professor John Lodewijks, S P Jain School of Global Management Alex Reeman-Clark, Kaplan Business School Ewa Filipiak, TAFE Directors Australia</p>
<p>Focus group 5: Involving participants from Australian VET providers (3) and representative associations (1). In total focus group 5 involved four participants from three TAFE institutes.</p>	<p>Jonathon Maile, South Metropolitan TAFE Marc Blanks, Melbourne Polytechnic Deb Hyam, Box Hill Institute Ewa Filipiak, TAFE Directors Australia</p>
<p>Interviewees [17]</p>	<p>Professor Sanjay Barbora, Tata Institute of Social Sciences, Guwahati Assistant Professor Pradeep Kumar Choudhury – India Associate Professor Harsh Suri, Deakin University – Australia Dr Ameeta Jain, Deakin University – Australia Dr Kopal Chaube Dutta, Deakin University – India Kriti Dagar, National Institute of Education Planning and Administration – India Dr Monica Kennedy, Austrade – Australia Vik Singh, Austrade – Australia Vishal Sawant, Infosys – India Aparna Jain, TATA Consultancy Services - India Lakshmi Iyer, Sannam S4 – India Marnie Watson, Sannam S4 – India Kisha Gupta, Infosys – India Leoni Russell, RMIT University – Australia Kate Gemmell, University of Canberra – Australia Anna Richards, University of Queensland – Australia Marianna Sarris, University of Melbourne – Australia</p>

APPENDIX 3 – Australian and Indian Professional Associations

Table 12: Regulated Professions: Australian and India Professional Associations

Regulated professions	Australia	India
Accounting	Chartered Accountants Australia and New Zealand Certified Practising Accountants of Australia Ltd Institute of Public Accountants	The Institute of Chartered Accountants of India The Institute of Works and Accounts of India
Health	Medical Board of Australia	National Medical Commission
	Australasian College of Physical Scientists and Engineers in Medicine	
	Australasian Osteopathic Accreditation Council	
	Australian and New Zealand Podiatry Accreditation Council	
	Australian and New Zealand Society of Nuclear Medicine	
	Australian Institute of Medical Scientists	
	Australian Orthotic Prosthetic Association	
	Australian Podiatry Association	
	Australian Psychological Society	
	Australian Society of Medical Imagery and Radiation Therapy	
	Council on Chiropractic Education Australasia	
	Dietitians Association of Australia	
	Optometry Council of Australia and New Zealand	
	Speech Pathology Australia	Central Council of Indian Medicine
	Chinese Medicine Board of Australia	Central Council of Homeopathy
	Australian Physiotherapy Council	Rehabilitation Council of India
Occupational Therapy Council		
Australian Pharmacy Council	Pharmacy Council of India	
Australian Nursing and Midwifery Accreditation Council	Indian Nursing Council	
Australian Dental Council	Dental Council of India	
Law	Legal admissions authority of a state or territory	Bar Council of India
Teaching	Australian Institute of Teaching and School Leadership	National Council for Teacher Education
Veterinary medicine	Australasian Veterinary Boards Council	Veterinary Council of India
Architecture	Architects Accreditation Council of Australia	Council of Architects
Engineering	Engineers Australia	Engineering Council of India
Company secretaries		
Aviation	Civil Aviation Safety Authority	
Computing	Australian Computer Society	
Management	Australian Institute of Management	
Business analytics	Institute of Analytics Professionals of Australia	
Maritime	Australian Maritime Safety Authority	
Social and community work	Australian Association of Social Workers Australian Community Workers Association	
Surveying	Australian Institute of Quantity Surveyors Surveying and Spatial Sciences Institute	
Translators and interpreters	National Accreditation Authority for Translators and Interpreters	

Source: Adapted from Freeman, 2018.

Note: Global associations, such as the Association of Chartered Certified Accountants, are not included in this table.



