

Supporting the interests of students

- i. How can the quality and accessibility of reliable information be improved? What role can ESOS have in ensuring providers and their agents are held to account for supplying prospective and current international students with accurate and timely information?

Comments

Focus has been too much on physical face to face interactions offshore that cannot access whole audience, very expensive and widely known that brochures are out of date when printed. Until recently (a TAFE started surveying starters, various better private providers had been doing anyway) was unaware of any institution asking commencing students of their experience with agent and accessing information, with focus upon agent only, not education experience (?).

Conversely, not sure whether institution allowed general feedback but only specific questions focussing upon agent e.g. the candidate surveyed had issues with information direct from institution before using agent, student visa information and processing issues from DIAC post, i.e. Embassy in Moscow.

There seems to be an education culture in Australia where quality is based upon qualification and not what actually happens, i.e. evaluating learning, teaching, administration, agents etc. but no scrutiny as a whole?

Recommendation/s

More use of the internet and websites to allow information access from anywhere at anytime internationally, and feedback as part of evaluation or satisfaction surveys to help assess study experience from first interest through to graduation, and adapt.

- ii. How should the Australian Government and the international education sector protect international students if a provider closes? How should this be resourced?

Comments

Have limited expertise and knowledge in existing mechanisms, state institutions have advantage of state backing and size, versus privately run commercial, i.e. uneven playing field.

Recommendation/s

All providers including state sector guarantee fees in tandem with insurance, while cooperating on quality evaluation and processes.

- iii. Are different mechanisms needed to support international students to resolve complaints effectively? Are additional complaint mechanisms needed?

Comments

All candidates must have option of making complaint anonymously so as not to be intimidated, discouraged nor threatened with alleged visa non compliance by institution and or personnel.

Recommendation/s

Hierarchy of channels, first suggestions/complaints system, followed by formal complaints system (registered for later auditing), both internal, then an external system if complainants are not happy with complaint handling at institution.

- iv. Should an international student's ability to change their education provider be limited, if so in what way?

Comments

The same as an Australian student would or would not be limited. Having established a private language centre (International House franchise), in Turkey, and also have worked at both Australian university and private college, the advantage of visa conditions is that students cannot choose on quality versus private sector elsewhere who compete and operate on quality as candidates (kids to middle aged professionals and housewives) can change course anytime they like.

Recommendation/s

Six months is about right, but candidates must be informed of where to address concerns regarding quality, and those requesting transfers must explain why (as they do now), and relevant quality or registration agency must be informed of reasons. Most state are flexible, but many private absolutely rigid....

Delivering quality as the cornerstone of Australian education

- v. How can the intersection between ESOS and the underpinning education quality assurance frameworks be improved?

Comments

Unfortunately quality in education in Australia is viewed as a paper based administrative process, i.e. not intrusive nor enlightening, more like "box ticking". Obviously a need for quality control through whole process including registration of colleges, regular evaluation, teaching/learning quality, agents, provider administration and support, most importantly, ask candidates, they are the ones who know.

However, when working at RMIT University and started evaluating both international and domestic business classes I taught (using techniques studied at Victoria University in M. Ed.), I was warned that under no circumstances were international students (fee paying clients?) to be asked their opinion on the education or teaching quality in their courses, only teaching materials..... Argument was that a all teachers were qualified up to PhD. therefore they were all top quality.....? Further, when I checked about peer teacher development, i.e. another teacher observing a lesson to give me feedback, was told absolutely forbidden?

This suggests some avoidance of scrutiny? Students cannot simply leave for better quality provider like happens elsewhere?

Recommendation/s

Active feedback through all sectors and areas of international education, onshore and offshore.

- vi. Where do international students' needs differ to other students, such that additional or different regulation is required?

Comments

Personally I am not that sure if there needs are any different from Australian students and their Australian study experience, should include benefit of all, qualification and career outcomes. Unfortunately, there are too many mono cultural private colleges which should set alarm bells ringing, but also in state sector some classes are entirely international because of skills shortage pathways (Australians do not study?), and personnel state that it is "easier" under CRICOS to keep them separated.... a bit "Nuremburg like"? Further, attitude especially from many in state sector, quote from TAFE International Director, "who cares what they think, they have plenty of money"

Recommendation/s

Keep CRICOS principles under ESOS implicit, but providers must be encouraged/enforced to increase diversity in classes, not just cash in on international income from large demand markets..

Effective regulation

vii. Is ESOS compliance and enforcement adequate?

Comments

No, it is paper based and does not require anyone to enforce, until too late. Good management and marketing revolves round feedback, MIS etc. but ESOS does not include, except to focus mostly upon agents, but institutions generally assess agent performance based upon numbers, i.e. short term selling targets (which encourages many agents to become aggressive and less than ethical, no discrimination or understanding of different demand between Asia and Central Europe).

For example a senior TAFE director when warned about the behaviour of an infamous agent replied that he did not care, as they sent students, because his management was demanding higher numbers to increase income.....

Recommendation/s

Intrusive enforcement for all stake holders in system from users of the system, most important is ongoing feedback from candidates, and other stakeholders, on a regular basis.

viii. Can risk be better addressed through strengthening registration requirements and/or better targeting of compliance and enforcement action? How else can risk be managed?

Comments

Not sure what is being done at state level? Everyone knows when bad colleges exist, but no one will say anything? We have tried to complain about unprofessional and unethical behavior in Australian industry onshore and offshore including rorts, corruption etc.), but message from ESOS has been to discourage further action if state institution, or told to approach state registration authorities to complain if private college.

This occurred just recently with ESOS/DEEWR regarding unethical behaviour of a university's international office personnel in Melbourne (travel rorting, taking market data and tools in breach of commercial in confidence as they had broken agreement but not yet informed us....., unprofessional, unethical etc.) when VC/DVC level refused to investigate (i.e. after no acknowledgement of complaint, no request for details from complainant, then finally said it had been investigated, but they forgot to inform the complainant of any outcomes?).

We are more than happy to explain what happened, the institution and the DEEWR Director who advised..... but to be fair not much different from other universities....

Response of ESOS was to intimate that state sector is not obliged to comply with the ESOS Act. (!!!??), probably because of loopholes allowing institutions to avoid scrutiny e.g. ask a question about an issue or fairly challenge the provider, they break your agreement unilaterally to cease all discussion and scrutiny. Australia today?

Related, all institutions do not seem obliged to act on feedback and complaints if they can threaten agents with breaking contract (like threatening students over visa compliance)? Further, shows a complete lack of understanding of business ethics and common law, i.e. you can make legal agent agreements or contracts then break them at whim?

Recommendation/s

The sector needs to be scrutinised more but not just paper based, needs to be open feedback about all parts of the sector.

ix. What should be the balance between a focus on inputs and prescription versus outcomes?

Comments

Not sure what balance is now? But firstly whatever criteria are used to register providers, need to be assessed regularly based on direct and indirect, again, candidates and agents are well placed to comment on individual institutions.

An example we see is the prescriptive and incorrect definition of "marketing" under the ESOS Act. The way it is written, encourages deference to offshore promotional events at best, or at worst carte blanche routing of travel opportunities by provider personnel. Any standard definition of marketing is about feedback from clients and quality control, onshore. However, the Australian education sector's definition under ESOS is to meet prospective candidates offshore, meaning one enquiry justifies a visit (we have seen this as a common base for travel plans as they are known by insiders)?

Further, this also precludes agents from marketing effectively i.e. feedback from candidates, internet, liaising with providers onshore etc. when provider personnel demand opportunities to attend exhibitions, fairs etc. offshore, when they should be onshore marketing to existing candidates (word of mouth, agents and internet are estimated to account for 90-99% of candidates starting onshore, not physical promotional events offshore).

Recommendation/s

Ensure prescriptive written in stone activities or tasks under ESOS are not used as an excuse to not assess outcomes, e.g. surveying of candidates about their experience from initial enquiry through to graduation and related outcomes. The latter would help ensure quality, the former may indirectly assist, but no proven linkage.

x. How can ESOS better support Australia's student visa program?

Comments

Many candidates complain that the Australian student visa and migration system is "Kafkaesque" or "Soviet" i.e. there is a study to PR pathway, but institutional personnel are not allowed to discuss visas and migration unless MARA registered. The system is to attract candidates to study in the skills Australia needs, but cannot offer any guarantees.

Further, we tell providers not to bother with any physical offshore seminars, fairs etc. because they will only be asked visa and migration questions which they cannot legally answer unless MARA registered. The way round this as TAFE, universities and private VET do, is to promote study and PR with MARA agent who then attends fair alongside provider personnel (and sometimes education agent, with all three competing for attention...), very confusing for prospective candidatesor as one commented "bizarre, who are we supposed to listen to?"

Result now with recent media stories, racial violence, clampdowns, reviews, migration changes etc. is that many prospective candidates are doing nothing, waiting, or looking to Canada etc.....

Recommendation/s

All institutions should have access to MARA migration advice which is available to enquiring and ongoing candidates, especially online, before applying. Further, to save on carbon emissions and incessant international travel, all institutions must have written and video advice available on their website related to visas. migration etc., and a neutral advice line for candidates onshore from DIAC explaining visa, migration etc.

Sustainability of the international education sector

- xi. What role should ESOS have in supporting the ongoing sustainability of the international education sector given the challenges it faces into the future?

Comments

Quality quality quality....Australia still does not have a quality culture and we see too much in private and state sector especially, avoidance of scrutiny and accountability, plus quality assessment, through ESOS being too prescriptive i.e. too much detail which precludes good management and assessment of overall picture.

Further, the preferred marketing methods create a vicious cycle where sector prefers to travel, but can only travel where they can gain travel approval based upon certain short term recruitment numbers (apportioned to agents even though they have no choice on marketing channels), which leads onto focussing upon physical events in particular markets easier to recruit from e.g. big ones like India, China etc., then there are problems with dominating classes....

Already, and in future to increase diversity and sustain the sector, the internet is the best channel being available 24/7, interactive, economic, effective and measurable market development and recruitment. Further, Australian Tourism Data Warehouse produced a free online marketing eKit November 2008, commended internationally for replication, 10000 downloads by tourism industry Australia and abroad on first day of release, education sector.....probably zero....? Sample feedback from university personnel "we know the internet is effective, but if we used it we would not need to travel...."

If Australia wants to diversify its international student markets and the student experience in Australia, the internet must be the prime promotion, marketing and up to date information channel. International offices and providers should be forced to develop their staff with up to date marketing techniques (versus physical short term selling) through workshopping ATDW eKit amongst institutional personnel, and other e.g. how to interview and survey candidates on quality.

Recommendation/s

All institutions, in cooperation with agents and related offshore entities, must conduct marketing, promotion, information and recruitment strategies online. The advantages include economic channel, accesses variety of markets simultaneously, information can be kept up to date, utilise onshore resources e.g. other languages and communities, plus monitor and analyse web visitors (how many, where from, search/info request, how much traffic is generated via agents, conversions etc.)

General Comments

Worked in Australian and international education industry for nearly 20 years but still see basic issue, avoidance of scrutiny, accountability, and the internet....

Thank you.