

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

More temperate marketing should be conducted by Australian embassies and recruitment firms, so that a more realistic picture is drawn of the degree of difficulty likely to be encountered when undertaking various kinds of training and education in Australia.

Recommendation/s

A central clearinghouse of all information published about educational programs offered to overseas students should be maintained by a Government agency, with minimum standards set for these materials to ensure accuracy, currency and value. Networking between current, prospective and previous students should also be supported in the interests of ensuring they develop a sense of not being left to their own devices.

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

Comments

Recommendation/s

A guarantee fund should be established and maintained by the Government with the express purpose of compensating overseas students in the event of sudden closure of a college or training body. All providers of courses to overseas students should be required to register, with a portion of the registration fees set aside for the guarantee fund which would be controlled by a Government appointed trustee.

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

Comments

The Overseas Student Support Network Australia (OSSNA) recently reported that overseas students are becoming increasingly desperate. (PM - 8 September 2009) - see <http://www.abc.net.au/news/stories/2009/09/07/2679100.htm>

OSSNA executive director Robert Palmer said that since the start of the year (2009), about 1,500 students have come to his organisation with legitimate and serious complaints about being tricked and ripped off.

ADAVB supports the Education Services for Overseas Students Amendment (Re-registration of Providers and Other Measures) Bill 2009 (the bill) which addresses the growth of training providers capitalising on rising demand, especially from India, for

an education and the chance for permanent residency. We welcome the key amendments of the bill, which strengthen the registration process and are intended to reduce the number of high risk providers currently in or seeking entry into the sector. While this bill is recognised as a transitional measure intended to address immediate matters of concern, we trust that the Education Services for Overseas Students Act Review will establish long terms measures of a similar nature.

Recommendation/s

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

Comments

No comment.

Recommendation/s

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

There are three ways in which overseas qualified dentists can enter the profession in Australia: by enrolling at an Australian dental school where they may be granted some credit for previous study, by immediate recognition of their existing qualifications or by successfully completing the Australian Dental Council (ADC) examinations. See <http://www.dentalcouncil.net.au/dentistryinaust.html>

Overseas trained dentists are eligible to undertake the ADC examination procedure if they have completed and passed a dental degree which included at least four years' full-time academic study at a university recognised by the ADC and are registered as a dentist in their country of training or practice.

The recognition of overseas trained dentists from most countries requires that they satisfactorily complete ADC examinations. The examination procedure consists of three parts - an Occupational English Test (OET); a Preliminary Examination (Multiple Choice Questions and Short Answer questions); and a Final Examination (Clinical). These must be taken sequentially.

All overseas trained dentists (regardless of country of training) are required to pass the Occupational English Test (OET) prior to acceptance into the ADC examinations. Since 1 January 2006 exemptions are no longer granted. No other English tests are accepted by the ADC. A pass in the OET is valid for two years. Candidates are required to hold a valid OET pass at the closing date of each exam stage applied for, i.e. at both Preliminary and Final Exam. No exemptions are granted.

In Victoria there are two main courses or bridging programs offering to help prepare overseas trained dentists for the ADC examination. The first is a Graduate Certificate in Clinical Dentistry conducted by Dental Health Services Victoria in association with The University of Melbourne - see <http://www.dhsv.org.au/content.asp?z=2&c=7&p=201>

The other is an unregistered 8 week bridging program - offered in the form of an extended professional development program by the Asia Pacific Institute of Dental Education and Research (AIDER). See <http://www.aider.com.au/AIDERMAINPAGE.html>

ADAVB suggests that ESOS should consider bridging programs as well as courses which result in a qualification in their own right.

Feedback from senior ADAVB members involved in working with overseas trained dentists indicates that quality assurance needs to be focused on entry requirements as well as on course structure and contents. One said:

"I would be directing the Review towards the 'focus' of the educational activity as it reflects the end result. My issue here is that the current (dental OTD) courses are not

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a) selective enough with the candidates that they accept. If the intention of the course is to prepare candidates to PASS the ADC exam the candidates have to have a reasonable skill level to commence with

b) honing existing skills to meet exam requirements rather than creating skills. This follows from the previous point where the emphasis of courses seems to be quite basic theoretical (3rd /4th year) without practical application emphasis.

The most consistent problem that is found is that candidates present with generic knowledge that they cannot apply clinically and the courses do not emphasize this enough. It is not the role of the bridging course to create basic skills and concepts. This cannot be done within the course time-frame and the issue is that the course then is unable to meet the expectations of the students. A restructuring of the delivery process for most of the courses to be more directive would seem appropriate."

Another with similar experience observed:

"Having dealt with a number of overseas graduates whose English language skills vary from fair to appalling I would submit that the minimum IELTS score should be 7.5 in each component and should be achieved no more than 12 months before applying for registration. It might also be helpful if a follow up test, perhaps after 2 years, was mandated."

Overseas trained dentists who responded to our request for input to the review generally consider that English language skill requirements are too onerous, with some suggesting they are being used as barriers to entry by well qualified people. One noted:

- The English skill requirement should not apply to the overseas trained dentists who have already registered and want to renew their licenses.
- The English language skill standard should apply only to the new applicants seeking registration.
- The IELTS test and OET are the acceptable tests for the English language requirement.
- The overall score 7 in IELTS test is too high and should be reduced to 6.5 with no lower than 6 in each band.
- Grade A and B in OET is appropriate to prove English language ability.

ADAVB supports a high level English language requirement based on concern that any person registered to practice dentistry in Australia must be able to communicate with patients other than those from their own ethnic group, and must do so at a level which ensure informed consent.

Recommendation/s

ADAVB believes that ESOS should address English language requirements for recognition of health professionals with overseas students, so that a better appreciation of safety and quality concerns is gained and the automatic assumption of barriers to entry is rebutted.

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

Comments

Overseas trained dentists often have no support network on which to call if they encounter difficulties. There may be support services available but these are not well known or publicised.

Recommendation/s

Establish a central website which acts as a clearinghouse for overseas student support services would desirably, hosted by the Australian Government.

Effective regulation

vii. Is ESOS compliance and enforcement adequate?

Comments

ADAVB does not believe so, as too many instances of college closures, student rip-offs and other scandals have been reported in recent times.

Recommendation/s

Increase resources allocated to inspections of and remedial support for training institutions and colleges, and require registration by all providers of any form of training targeted at overseas students, including bridging programs.

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

ADAVB supports the strengthening of registration requirements along with improved support structures for both colleges and students.

Recommendation/s

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

Comments

Recommendation/s

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

Comments

Recommendation/s

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

Consulting support needs to be made available to colleges - along the lines of critical friend reviews - to help them meet agreed standards. These would need to be offered on a fee for service basis.

Recommendation/s

General Comments

The ADAVB made representations in 2008 to the Skilled Migration Unit in Victoria and to the Department of Human Services (as it was then known) arguing that more support was required for overseas trained dentists, both at the stage they are preparing to undertake examinations to become registrable, and in the period following their registration. Neither of these organisations responded.

ADAVB representatives would be pleased to provide a copy of our earlier submission if this would be of interest to ESOS personnel, and we would also be pleased to discuss any of the matters raised herein or in the earlier submission if this would assist.

Thank you.