

Submission template

Please note that the Department usually publishes and reserves the right to publish any written submission received and the names of persons making written submissions in the course of this consultation process.

If you consider that information in your submission should be treated as confidential, or if you wish to remain anonymous please clearly indicate this in your submission or in a cover note and provide reasons for your request.

The Australian Government reserves the right to accept or refuse a request to treat information as confidential and will use the criteria set out in the Department of Finance and Deregulation's Financial Management Guidance No. 3 on confidentiality in procurement, July 2007, as a guide when determining whether to accept a claim for confidentiality. Information relating to individuals will be protected under the *Privacy Act 1988*. Requests for access to such information will be dealt with under the provisions of the *Freedom of Information Act 1982*.

The template reflects the terms of reference for the review and the issues identified in the issues paper. Please refer to the issues paper and terms of reference for more information.

A field for general comments has been included below for you to raise additional issues.

Written submissions are to be received by 30 October 2009 and sent by email to:
esosreview@deewr.gov.au.

About you:

Institution / organisation

Name:

Australian Homestay Network (AHN)

Sector:

Accommodation and Welfare

Prepared by:

xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx

Contact details:

xxxxxxxxxxxxxxxxxxxxxxxxxxxxxxxx

Student / individual

Name:

Institution / organisation:

Course / role:

Home Country:

Contact details:

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

The National Code needs to be more specific regarding accommodation and homestay benchmarks and standards for all international students (not just under 18's). Currently students over 18 must be advised of accommodation options but there is no further assistance for these students in many institutions leaving them to fall foul of unscrupulous landlords in some instances.

By raising the accommodation standards Institutions will be obligated to only partner with groups who can demonstrate appropriate systems, processes, procedures and support structures to ensure that the quality and accessibility of reliable information is of a high standard and protects international students of all ages..

At the Australian Homestay Network (AHN) we recommend the following as a minimum:

- An online, compliant and accessible management system including proper training and support for hosts and adequate pre-arrival orientation material for students and agents. All aspects of the system should be auditable and the system should be able to generate statistics and reports as required.
- An acceptable industry Advisory Board overseeing the integrity of all Homestay systems and processes
- Professional outsourced 24/7 phone support including emergency and critical incident management, appropriate interpreter support, and medical advice and support
- Compulsory appropriate contents insurances for both Hosts and Students including legal liability insurance

Recommendation/s

That the National Code be upgraded to establish new minimum benchmarks and standards for Homestay programs for all students whether under 18 or over 18 years of age.

The following is recommended as a minimum requirement for both inhouse and outsourced homestay programs:

- An online, compliant and accessible management system including proper training and support for hosts and adequate pre-arrival orientation material for students and agents

- An acceptable industry Advisory Board overseeing the integrity of all Homestay systems and processes
- Professional outsourced 24/7 phone support including emergency and critical incident management, appropriate interpreter support, and medical advice and support
- Compulsory appropriate contents insurances for both Hosts and Students including legal liability insurance

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

Comments

Compulsory group insurance.

Recommendation/s

That all providers participate in a group Insurance scheme to protect international students from course/provider closures.

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

Comments

Yes.

The Australian Homestay Network would like to see more specific benchmarks for homestay established which include proper dispute/grievance resolution processes.

We also support the appointment of an international student Ombudsman to be modeled in a similar way as is conducted within the Australian Private Health Insurance industry.

Recommendation/s

1. That the ESOS Review establish more specific benchmarks for homestay which include proper dispute/grievance resolution processes.

2. That the ESOS Review support the appointment of an international student Ombudsman to be modeled in a similar way as is conducted within the Australian Private Health Insurance industry.

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

Comments

This is not our area of expertise.

Recommendation/s

N/A

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

It is our opinion that ESOS needs to improve its commitment and clarification regarding the entire 'international student experience'.

This would include all ancillary services (accommodation, safety, orientation, induction etc.) as well as the education quality assurance framework. International students who are well oriented, have a successful accommodation placement and have developed a community network tend to have a successful education experience.

Recommendation/s

That ESOS improves and clarifies its commitment regarding the entire 'international student experience' including all ancillary services (accommodation, safety, orientation, induction etc.).

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

Comments

International students are vulnerable to accommodation scams both before they arrive in the country and upon arrival. Education institutions need to ensure that they are assisting international students with respect to appropriate accommodation choices.

Benchmarks are needed for both the communication of these choices and the minimum standards required by the National Code (refer recommendation in i. above)

Recommendation/s

That the National Code include an obligation of Institutions to be able to verify the standard of all accommodation referrals.

Effective regulation

vii. Is ESOS compliance and enforcement adequate?

Comments

It is our view that the National Code needs to be regulated by establishing enforced checks and not allow it to be self regulatory by institutions.

Recommendation/s

That stronger and more specific benchmarks and standards are set relating to accommodation, homestay and guardianship and that these standards are regulated.

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

Yes.

The standard of minimum requirements needs to be raised.

Recommendation/s

The Australian Homestay Network (AHN) supports the strengthening of registration requirements and better targeting of compliance and enforcement action.

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

Comments

Recommendation/s

N/A

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

Comments

The Australian Homestay Network believes that international students can be better regulated through DIAC visa conditions.

Many of the international student accommodation issues would disappear if a condition of the international student Visa included an obligation of the student to meet the agreed and documented accommodation regulations in Australia. Participating in overcrowded accommodation should be a breach of the International Student visa.

Recommendation/s

DIAC to assist with establishing a condition of Visa relating to appropriate accommodation.

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

The Australian Homestay Network believes that if ESOS expanded its charter to be more comprehensive in the area of the 'international student experience' there would be less challenges regarding the sustainability of the international education sector into the future.

Recommendation/s

That ESOS expands its charter to be more comprehensive in the area of 'international student experience'.

General Comments

AHN is a national network of:

- individuals
- institutions
- organisations
- agents and groups

All our members are committed to the provision of quality Homestay services.

We are Australia's only national network of Homestay Supervisors and responsible for the largest trained Homestay Host pool and Homestay Placements in Australia.

We are acknowledged as the industry leaders and in 2010 will place over 10,000

international students into homestay accommodation.

We work closely with Education Institutions (Government and non Government) as well as industry groups (such as ACPET (we have been appointed as their industry partner) and ISANA).

The Australian Homestay Network has also been appointed by the City of Darebin (Melbourne) as their strategic partner in homestay and we work closely with La Trobe University as they are located in that Region.

Many of our members are supervisors who use the AHN system, protocols, insurance and professional 24/7 services for the proper management of Agents, Institutions, Homestay Hosts, and Students.

AHN members are committed to and share the vision of:

- A consistent and compliant approach to the provision of Homestay services in Australia
- Continuous development and improvement of the AHN system and procedures for the benefit of all AHN members
- The promotion of AHN Homestay as a marketing positive for studying in Australia

There are many small and unregulated Homestay managers who have poor processes and systems. They are unaccountable and do not carry adequate support and insurances for the student or host. These need to be made to deliver higher standards through Education Providers and Agents.

The Australian Homestay Network was the main homestay submission to the 'Senate Inquiry into the Welfare of International Students'.

We have included our main recommendations to this Inquiry below as we feel that they are relevant to assist you with this review.

We would be happy to meet with you to discuss further if that is possible.

1. That the Government introduce legislation to ensure that all Homestay managers/supervisors meet minimum standards in their operating, training, and support procedures for hosts and international students
2. That Education Agent managed Homestay be eliminated and in particular those without risk management and critical incident protocols in place
3. That online automatic matching of hosts and students without an appropriate supervised support structure be eliminated
4. That strict recruitment guidelines for homestay hosts be mandatory and include a signed agreement as well as ongoing supervision, training and support
5. That all Australian Homestay programs must include professional 24/7 phone support including emergency/ critical incident management and interpreter/medical support
6. That all Australian Homestay programs must include appropriate contents insurances for both Hosts and Students including personal liability insurance

7. That the Government continue to assess approved Homestay revenue as tax free for hosts who have up to 2 students in appropriate accommodation

8. That the tax free entitlement be extended to include all variations of International Student Homestay conducted by approved Homestay Supervisors

9. That the Government assist in the marketing of Homestay Hosting Opportunities Australia wide so that the quality and quantity of the hosting pool can be increased

10. That the Australian Government encourage appropriate local authorities to adopt "Homestay" strategies and by laws to ensure compliance and quality control

11. That all Homestay programs in Australia must include appropriate online Agent, Student and Homestay Host training and orientation programs (with particular emphasis on risk management and compliance issues)

12. That the Australian Government provides advertising support for Approved Australian Homestay Host procurement programs

13. That appropriate "student support" online Host training and assessment be made mandatory for all Australian Homestay host applicants

14. That the Australian Government work with the Australian Homestay Industry in developing/enforcing appropriate online training and orientation materials for overseas agents, students and their families

15. That International Students be provided with additional points for Permanent Residency Applications if they have successfully participated in an approved Homestay program for a defined minimum period

16. That the Australian Government ensure that Education Providers in Australia referring/ promoting/providing any Homestay Program meet minimum standards and include the following:

- An online, compliant and accessible management system including proper training and support for hosts and adequate pre- arrival orientation material for students and agents
- An acceptable industry Advisory Board overseeing the integrity of all Homestay systems and processes
- Professional outsourced 24/7 phone support including emergency and critical incident management, appropriate interpreter support, and medical advice and support
- Compulsory appropriate contents insurances for both Hosts and Students including personal liability insurance

17. That the Government ensure that the intent of the CAAW (Confirmation of Appropriate Accommodation and Welfare for Under 18's) with respect to "Appropriate Accommodation and Welfare" is being properly delivered. Regular audit checks within institutions are required

18. That the Australian Government work with the Australian Homestay Industry in developing/enforcing appropriate minimum standards and facilitating appropriate and consistent solutions for the Industry

For our full submission please refer to the following link:

<https://senate.aph.gov.au/submissions/comittees/viewdocument.aspx?id=1ad957d1-4c21-4efc-be85-bc483a6a0b1e>

Thank you.