

**Submission to the ESOS Review****Institution / organisation**

Name: Australian & New Zealand Association of Theological Schools (ANZATS)

Sector: Private and public Higher Education

Prepared by:

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Contact details:

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**Background**

ANZATS is a voluntary association embracing theological Higher Education teaching institutions in Australia, including all the university departments teaching theology, all the consortia, and all but a handful of individual schools. This submission is made on behalf of theological education as a whole, but may not represent in detail the position of any particular member school. It seeks to offer perspectives on the distinctive place of overseas theological student education, and also on the wider question of what is best for overseas students in any institution.

Theological institutions in Australia have included overseas students for many years. The circumstances in which this takes place are distinct from those which generally apply in Higher Education and VET, however, in three major ways:

- a) Few theological students come to Australia under their own steam. Almost all are nominated by a church or teaching institution in the sending country, with a corresponding supporting institution in Australia. Financial, community and personal support is shared between sending and local churches / institutions
- b) In view of the above, the likelihood of an Australian theological teaching institution failing to fulfil its obligations to an overseas students is remote. Since its establishment in 1968, a small number of ANZATS-related schools have closed, but (to the best of my knowledge) no ANZATS member school has left an overseas student unable to complete his or her course, nor had cause to draw on a Tuition Assurance Scheme. (I am aware of occasions when an overseas student has been reported due to visa conditions being violated.)
- c) Most theological students coming to Australia from overseas are, from their perspective, 'post-graduate': most have already completed a course in their home country before coming to Australia, even if not of a Higher Education level.

Given these factors, the questions posed in the template do not relate easily to the theology sector: General Comments are thus made first, followed by responses to some questions.

## General Comments

Overall, ANZATS found the Issues Paper to be particularly well focussed, expressing the range of issues encountered regarding overseas students. What was found surprising is the rapid growth in the VET sector, which involves few theological students. ANZATS is strongly supportive of the analysis made in the Paper of the issues related to ESOS, and (apart from its own particular interests).

ANZATS make these overall comments, in view of the factors noted above:

- a) Theological institutions respect the intent and need for ESOS and related regulatory requirements, and support the continuance of a strong regulatory regime. Yet they are concerned that administrative compliance be kept as minimal as possible, especially for institutions with a good long-term record of student care and support.
- b) As regards regulation, firmer requirements regarding the registration of teaching institutions are seen as preferable to more detailed reporting of individual students. ANZATS institutions find that PRISMS generally works well, but suggest that the assignment of a CRICOS code be more tightly regulated. The use of categories for VET colleges and Non-Self-Accrediting Institutions in the Higher Education sector, with corresponding higher and lower fee and audit requirements, would assist this: for example, 'provisional', 'standard' and 'reliable' (and ANZATS would see theological institutions in the latter category of course, along with the universities).
- c) The time and money costs involved in administering Tuition Assurance Schemes has been complicated since 2005 by the (proper) requirements for the demonstration of financial viability as a condition of being able to participate in the FEE-HELP scheme.

**In sum, the major suggestion made by ANZATS is that CRICOS categories be introduced, and that the ESOS and FEE-HELP schemes be brought together, preferably as part of the TEQSA.**

## 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

Could websites such as 'goingtouni' and 'Study in Australia' be developed further to inform potential overseas students of what really matters in considering Australia? Do similar sites exist for the VET sector?

ANZATS suggests that national standards be set for IELTS scores for admission to the various levels of academic awards.

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

ANZATS suggests that the replacement of individual TASs by universal participation in the ESOS fund (with varied premiums for different CRICOS categories as suggested above) may be worth considering: such a change would need widespread consultation, and may not be supported by all ANZATS members, however.

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

ANZATS has no experience in this area, but suggests that language / culture interpreters may be needed where there are complaints (if not already provided).

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

ANZATS is not in a position to comment, though on the surface, treating Australian students differently would appear to be problematic.

### **Delivering quality as the cornerstone of Australian education**

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

As noted above, bringing ESOS and FEE-HELP requirements together in TEQSA may help.

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

Beyond noting the distinctive situation of theological students, where the crucial factor is good communication between sending and local institutions, ANZATS is not in a position to comment.

### **Effective regulation**

ANZATS has no other comments to make on this section.

### **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?

ANZATS's main comment is that made above, viz integration of ESOS with FEE-HELP and TEQSA.