

# Appendix B

## 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](mailto:esosreview@deewr.gov.au).

About you:

### Institution / organisation

Name:

ITC Education Ltd, part of the ITC Group, a controlled and wholly owned entity of the University of Wollongong

Sector:

Higher Education, ELICOS

Prepared by:

xxxxxxxxxxxxxxxx

Contact details:

xxxxxxxxxxxxxxxx

### 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

Recommendation/s

- 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

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

Comments

ITC Education Ltd trading as Wollongong College Australia (WCA) is wholly owned and controlled by the University of Wollongong (UOW), a Table A university. ITC Education Ltd is registered as a Higher Education Provider (HEP) and a Registered Training Organisation (RTO) although does not currently offer VET qualifications to international students. WCA also offers ELICOS courses accredited by NEAS.

WCA offers higher education Diploma programs to both international and domestic students, which articulate to certain Bachelor programs at UOW. These provide an important means of university access to international and domestic students, including some from disadvantaged backgrounds, who otherwise would not be eligible for undergraduate entry.

ITC as a controlled but separate legal entity to the parent UOW is subject to the tuition assurance requirements under ESOS. While we support assurance protection in the case of providers who may be regarded as presenting a element of risk, we also point out that public providers such as universities, TAFEs and schools, public and private who receive Commonwealth funding, are all exempt from tuition assurance arrangements such as ESOS TAS membership. Many universities in fact offer similar pathway Diplomas to ITC Education through their internal structures, and are exempt under ESOS.

We argue that controlled entities of Table A and B universities such as ITC Education present negligible if not zero risk, and should also be exempt under ESOS from tuition assurance requirements such as TAS membership. It is highly unlikely that a university or large public provider would be in default; for ethical as well as reputational reasons, they would teach out any program, or make suitable alternative arrangements, such as transfer students in a discontinued program to an equivalent course with full credit. As far as we know, all have done so in the past, and would be expected to continue to do so into the future.

Recommendation/s

Fully owned and controlled entities of Table A and B universities should be exempt from membership of tuition assurance schemes under ESOS, as are other public institutions, and schools in receipt of Government funding.

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

Comments

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

### Recommendation/s

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

### Comments

International students have the same needs as domestic students in relation to their right to travel economically and safely around their places of study and part-time work, and beyond as many seek to broaden their experience of the Australian society and environment. For this reason we strongly support the granting of student travel concessions, at present granted in some States, but not others. Travel costs can be a significant expense for students, exacerbating their need for part-time work. Students are also exposed to personal risk, when they choose to walk instead of taking transport. Granting of travel concessions would be a significant gesture of welcome to new students, and as noted would encourage travel and cultural engagement. There is also an economic argument that concessions may well be cost neutral to transport providers, through increased patronage.

There may be concerns at the cost to Government of subsidies to private providers as occurs with domestic students. If so, extend the concessions within the public transport system, and allow private bus companies to make their own policies. Anyway, States other than NSW and Victoria have managed it, and we should be nationally consistent.

### Recommendation/s

Travel concessions should be granted to international students in all States in the interests of equity and student safety.

**Effective regulation**

vii. Is ESOS compliance and enforcement adequate?

Comments

Recommendation/s

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

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

Recommendation/s

**General Comments**

Thank you.