

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.

About you:

Institution / organisation

Name:

Sunshine Coast TAFE

Sector:

VET

Prepared by:

xxxxxxxxxxxxxxxxxxxx

Contact details:

xxxxxxxxxxxxxxxxxxxx

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

This is hard to manage as there are a range of providers that pop up without notice and disappear just as quickly, and would be difficult to do through legislation as bad providers will always be ahead of the game!

Recommendation/s

Perhaps the legislation should provide for an agency that monitors compliance on a more regular basis for newer providers

There also needs to be more regular 'spot checks' on providers that have a range of negative feedback from current students.

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

Comments

The current Act covers this extensively for private providers and these are generally the ones that collapse without notice, so I'm not sure how this can be improved upon.

Recommendation/s

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

Comments

The processes will vary with each provider and maybe this would be improved with a more generally accepted process for all.

All government providers will have 'in house' processes which are very comprehensive, but the problems arise where it is a small provider without the opportunity to be objective and who may not have the facility for external assistance in place.

Recommendation/s

A state body for resolving complaints where a provider has not been able to do so, or lacks the resources to manage the process well and without bias (or perceived bias)

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

Comments

The current provisions are fair, with the exception of Queensland where state requirements do not allow providers to refuse change of provider of the student asks. I think the the 6 month clause is fair to all.

Recommendation/s

Review of all state legislations to ensure they are aligned.....hopefully!

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

Mostly the variety of needs should be met by the provider, and this is not a matter of regulation.

We are quite highly regulated in comparison with other countries.

Recommendation/s

Effective regulation

vii. Is ESOS compliance and enforcement adequate?

Comments

NO

Recommendation/s

See responses to question 1

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

Risk is best managed by an external body targetting compliance and ensuring standards are adhered to by all.

Perhaps a more comprehensive background check for new providers will help weed out those with 'dodgy' backgrounds.
financial checks
business checks
personal checks

Does any one do this now?

Institutions should have access to a listing of failed organisations to ensure their students are not taken in if they are planning to change to another organisation.

Recommendation/s

National listing of failed providers including the name of the CEO!

requirement for all providers to Quality assured

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

Comments

Focus on inputs is crucial to ensure regulations are adhered to, but at the end of the day the outputs are only achieved where standards are upheld and quality assured.

Recommendation/s

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

Comments

Recommendation/s

More people to undertake audits and mini-audits on a more regular basis in each state. This could be the same body that is the external complaints handling processes (not that I would care for this kind of job!)

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 challenges will be great and are at present many will be largely unknown in a rapidly changing world environment.

An investigation of other countries successful operations may be a good strategy.....fact finding market research is well understood and extensively undertaken by AEI, and this body has the opportunity to inform and recommend into the future.

ESOS is crucial to the reputation of the international student market in Australia as a form of protection in an increasingly mobile and selective student body. Relevant government ministers (state and federal)can play a role in 'talking the talk' when ever overseas.

We need to make it less traumatic to become a student, with some of our ourposts in a range of countries being obstructive in the extreme.

We also need to have a wide range of government to government agreements that ensure qualifications are recognised and accepted from other countries educational Institutions, and previous studies and work experience agreed to without a long process to 'get there' once people have committed to our country

Recommendation/s

Not really ESOS but, review of Visa costs and processes.

Maybe a listing of reliable and proven agencies in level 3 & 4 countries who are shown to adhere to National Code practices available on line.less failures once on shore for students

Requirement to undertake the agency training on-line

General Comments

A lot of the problems we deal with relate to the operations of offices, agencies and individuals who seek to make money out of this sector (both on and off shore) not with those of us trying our best to provide a quality experience once on shore, abiding by the ESOS Act and Code of Practice. It is a difficult task to manage this part of the operation, and I have no specific suggestions for this.

Large cities with large numbers of students from single locations will always have a harder job to integrate the students into the life of the nation. ESOS cannot regulate this, as Institutions have their own focus on business, but maybe there could be some consideration given to capping the numbers from over subscribed locations in cities and providing more incentives for regional study.

Thank you.