

Submission received by email from: Warren Milner

I've been Director of Milner International College of English for 24 years, thus having experienced every phase of regulation since 1984. I'm on the board of English Australia. The following are my personal views, though some correspond to the policy of English Australia.

Supporting the interests of students

- (i) The regulations of the current ESOS Act are well thought out and abundant. We don't need more.
- (ii) In the ELICOS sector, students are well protected by the existing Tuition Assurance Schemes (because there are so many ELICOS providers offering the same courses). Nothing needs changing. The VET sector is different and needs scrutiny. Don't impose one-size-fits-all on all sectors.
- (iii) Complaint resolution is more than adequate. Simplification would be welcome.
- (iv) Limiting a student's ability to change provider is probably anti-competitive and there are many legitimate reasons why a student's ability to change provider should be unfettered.

Delivering quality

- (v) I don't understand this question. Could it be expressed in plain English?
- (vi) Of course international students' needs differ from those of local students. These needs have been adequately addressed in (i) above. What needs careful analysis are the differing needs of the various international sectors, such as ELICOS, VET, University, Foundation etc.

Effective regulation

- (vii) ESOS compliance and enforcement have always been inadequate, at times scandalously so, but it varies state by state. In my view accreditation, regulation and enforcement in NSW and Victoria have been poor for years. Here in WA, regulation and enforcement have been conscientiously done. I'm not sure about the other states and territories, but I think they are better than NSW and Victoria.
- (viii) Whether the plethora of recent registrations in NSW and Victoria is due to insufficient requirements in those states, or they have been slack in applying the rules they've already got, I can only say it is one or the other or both. Here in WA we have the ESPRA Act, so don't need more or different regulation.
- (ix) The jargon defeats me in this question.
- (x) Australia's overseas student industry is the world's most regulated. More red tape is unlikely to bring dubious colleges to heel and is pointless and vexing for the respectable ones.

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Sustainability

- (xi) The role of ESOS should be to support institutions that behave ethically and responsibly. There are ample rules already. They just need to be systematically and rigorously applied so that institutions whose standards are deficient change their ways or are de-registered.