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Education Legislation Amendment (Tuition Protection and Other Measures) Bill 2019, VET Student Loans (VSL Tuition Protection Levy) Bill 2019 and the Higher Education Support (HELP Tuition Protection Levy) Bill 2019 [Provisions]

SUBMISSION

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BBI-The Australian Institute of Theological Education (BBI-TAITE) is a leading Catholic provider of online postgraduate theological education, offering awards and courses tailored to meet the needs of our students. We became an accredited Higher Education Provider (HEP) in September 2016 and offered our first accredited awards and courses in 2017. As we are an online provider, we have students from all over Australia, including regional areas, and internationally. Most of our students are primary and secondary teachers who are partly subsidised by their employer. The majority of our students are part-time, and most of our students are on FEE-HELP. We are a small HEP, with approximately 465 active students and up to 350 unit enrolments each trimester.

BBI-TAITE supports expansion of the TPS to include domestic students with student loans. However, we believe this expansion should go further to also include domestic self-funded (fee for service) students.

Having to plan for and administer TPS levies and separate protection arrangements (and costs) for domestic self-funded students is not only a red-tape and reporting burden, but also a cause for confusion where there are different protection arrangements for different students. It is important for BBI-TAITE, as an independent HEP, to have equity in protections, and it is important for our students to realise this equity.

Furthermore, as a small HEP, the rising costs of TAS insurance has certainly been realised, with a 25% increase in premiums from 2018 to 2019. These rising market costs puts pressure on student fees as we strive to remain competitive in the market while also managing increasing operating costs.

Equal coverage of all students under a government managed TPS will not only provide the best protections for students, it will remove the high costs of private insurance and ensure TEQSA protection requirements are met without the need for us and other institutions to report their individual protection arrangements. If this does not occur, private insurance for self-funded students will be expensive, premiums will no doubt continue to increase, and these costs will end up being passed on to our students through increased student fees.

BBI-TAITE strongly advocate for universal student protections provided by the proposed domestic TPS.

*Professor Gerard Moore, Principal and CEO, BBI-The Australian Institute of Theological Education,*

24<sup>th</sup> October 2019