

28 October 2019

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Australia

[www.acsa.sa.edu.au](http://www.acsa.sa.edu.au)



**RE: TUITION PROTECTION AND OTHER MEASURES BILL**

Dear Committee Secretary,

We are writing to provide feedback on the draft Tuition Protection Bills.

Adelaide Central School of Art (ACSA) is a leading independent, not-for-profit, tertiary provider of visual arts education. We were identified as the best art school in Australia for overall student experience according to the national Student Experience Survey (SES) findings released on the QILT website on 10 April 2019.

The School offers an Associate Degree, Bachelor and Honours in visual art. In addition to our undergraduate degrees, we offer specialist short courses, workshops and masterclasses. In our studio-based teaching program we emphasise structured sequential learning, developing practical skills in parallel with rigorous intellectual inquiry.

We strongly support the proposed expansion of the Tuition Protection Service (TPS) model to students in receipt of FEE-HELP and HECS-HELP at independent education providers and TAFE. However, we would also like to see this service extended to non-FEE-HELP students. While most of our students access FEE-HELP, we also have a proportion of non-FEE-HELP students who choose to pay their tuition fees upfront. If the proposed Bill is not expanded to include non-FEE-HELP students, we will need to continue to arrange private insurance for these students.

As a single-focus provider, we are a small and specialist institution. In Semester 1 of 2019, we had a total of 172 students enrolled in our undergraduate courses. The majority of these students enrolled part-time, resulting in an Equivalent Full-Time Student Load (EFTSL) of 37.125. Our Administration team consists of 11 staff members, with a Full-Time Equivalent of 6.5. Given ACSA's relatively small number of staff and students, it is inefficient and administratively burdensome to manage two different tuition protection arrangements.

The cost of providing private insurance for non-FEE-HELP students through ITECA has increased from 2018 to 2019, and Independent Higher Education Australia (IHEA) has advised that costs will continue to rise. Following the VET FEE-HELP exploitation, insurers are either unwilling to provide tuition protection or considering it a high risk area and pricing accordingly. ACSA has been offering tertiary qualifications since 1994. The quality of our courses is evidenced by our consistently excellent results in the QILT Student Experience Survey and by the success of our graduates. Given the strength and stability of our institution, we feel unfairly disadvantaged by the VET FEE-HELP exploitation and its impact on the cost of tuition protection. Equal coverage for all students under a government managed Tuition Protection Scheme will be a more equitable outcome for both students and independent education providers.

Thank you for considering ACSA's submission on this Bill.

Yours Sincerely,

Anna O'Loughlin  
**Academic Administration Manager**