Senate Inquiry into the Welfare of International Students

Submission by Education Adelaide

On behalf of the following members and stakeholders:

University of South Australia	University of South Australia
Flinders University	Flinders UNIVERSITY ADELAIDE · AUSTRALIA
International College of Hotel Management	International College of Hotel Management
Australian Council for Private Education and Training	ACPET AUSTRALIAN COUNCIL FOR PRIVATE EDUCATION AND TRAINING

Appendix 1

University of South Australia Senate Submission

University of
South Australia

Senate Inquiry into the Welfare of International Students

UniSA Submission

The **University of South Australia (UniSA)** welcomes the opportunity to provide comment on the welfare of international students. UniSA's fulsome response to this important inquiry is captured in the submissions from the Australian Technology Network and Education Adelaide, but in addition we would like to raise other related matters.

UniSA is represented on Minister O'Brien's 'Enhancing the international student experience' task force, which has a focus on student welfare and is working with stakeholders in Adelaide to address the issues that the inquiry raises and their manifestation in South Australia.

UniSA has developed a comprehensive provision of student services, compliant with the ESOS Act and the National Code. The University offers a range of services to ensure student safety on campus, and encourage inclusion and participation in University life. As part of standard practice, the University will continue to address and strengthen its student services, especially in relation to community engagement, social inclusion and student security.

The recent attacks on Indian students have brought to light broader issues facing the Australian higher education sector. For educated opinion leaders, the student safety issues have directed attention to the underlying structural issues which are of priority concern and have the potential to affect the overall brand. The major issues of concern are:

1. lack of quality management of the private Registered Training Organisations (RTOs)

2. unsustainable growth in that subsector

3. distortions driven by the MODL and PR for both the community and for bona fide VET education provision

State regulation of private RTOs

It is clear that in India, there is no understanding of Australia's Federalism hence the constant reference to the Australian Government as a single powerful entity. In light of this there is a need for the States to have a unified approach to regulation of private RTOs across the country. The key issue is the quality of the State and Territory authorities in approving and regulating the RTOs. It may be necessary to suspend approvals on new RTOs until regulation and compliance issues have been properly addressed.

The key issue is *compliance* with the current codes and legislation – greater legislation with the current weak compliance activity will only penalise those providers that already comply, rather than screening out non compliant education providers.

Educating Professionals
Creating and Applying Knowledge
Engaging our Communities

- *UniSA recommends that a unified approach to regulation and compliance of private RTOs be incorporated into TEQSA's remit*

- *UniSA recommends that approvals of new RTOs be suspended until regulation and compliance issues have been properly addressed*

Unsustainable growth

There has been exponential growth in the number and scale of RTOs, as evidenced by the number of institutions listed on the Study in Adelaide website. This list indicates a 70% growth in the number of VET providers since March 2008 (see Appendix A). This growth is unsustainable in both the short and long term. A significant issue is that of student placements. When developing programs, universities are mindful of industry placements, and quotas are set accordingly to ensure that all students can participate in placements. Potentially some of the smaller states such as South Australia will not have the capacity to support the number of placements required by all of the training providers.

- *UniSA recommends that the States set student quotas for RTOs appropriate to the discipline, to ensure capacity to deliver on student placements*

Implications of RTO closures

We have already seen the closure of some RTOs across the country. There are significant implications for both the students and other training providers arising from these closures. Each state needs to carefully plan to manage the fallout from college closures. Media strategies need to be developed, as do plans to ensure the volume of students are appropriately placed.

- *UniSA recommends that each state develops a plan for dealing with RTO closures*

Rebuilding the brand

The Australian Government has a significant opportunity to start rebuilding the brand with the visit of the Deputy Prime Minister to India in September. However, the DPM will need to have concrete plans and actions in order to rebuild the trust in the Australian Government. In a recent UniSA visit to India, it was clear that there are high expectations on the Australian Government to act to ensure the quality of education in Australia is maintained and issues of compliance are addressed.

Australian Education International and Universities Australia need to be investing in substantial long term engagement in our key source markets, such as India and China. The focus should not be on selling and recruitment, but rather on joint research, staff and student exchange and joint conferences.

- *UniSA recommends that AEI and UA pursue opportunities for collaboration and exchange in key source markets such as India and China*

Conclusion

UniSA believes that the Australian higher education sector is at a crossroads in terms of structural imbalances and unintended consequences of the nexus between skilled migration and education provision. The federal government needs to act in relation to state management of the RTO sector. A

2

whole of government strategy is needed to deal with the issue of education provision as it relates to skilled migration based on the critical shortage list. The government needs to address the issue of appropriate pathways to permanent residency and consider how this nexus can be sustained while the unintended distortions are removed.

Summary of recommendations

It is recommended that:

- a unified approach to regulation and compliance of private RTOs be incorporated into TEQSA's remit

- approvals of new RTOs be suspended until regulation and compliance issues have been properly addressed

- the states set student quotas for RTOs appropriate to the discipline, to ensure capacity to deliver on student placements

- each state develops a plan for dealing with RTO closures

- AEI and UA pursue opportunities for collaboration and exchange in key source markets such as India and China

For further information please contact Dr Anna Ciccarelli, Pro Vice Chancellor: International and Development, University of South Australia (ph: (08) 8302 0061).

14 August 2009

APPENDIX A

List of all institutions offering vocational courses in South Australia as at 10 August 2009.

Colleges marked with X have been registered since 7 March 2008. List downloaded from the Study in Australia website (http://studyinaustralia.gov.au/Sia/en/Tools/InteractiveMap.asp).

Access College Australia
Adelaide Central School of Art
Adelaide College of Divinity
Adelaide College of Ministries Inc
Adelaide College of Technology X
Adelaide Hospitality and Tourism School
Adelaide Institute of Management and Technology Pty Ltd X
Adelaide Pacific International College Pty Ltd X
Annesley College
Australian Institute for Higher Studies Pty Ltd X
Australian Institute of Business and Trade Studies Pty Ltd X
Australian Institute of Further Academics X
Australian Institute South Australia X
Australian Lutheran College
Bible College of South Australia Inc
Bruce Hartwig Flying School
Cambridge International College
Careers Australia College of Healthcare X
Carrick Institute of Education/Carrick English Language X
Clip Joint Education
Colour Cosmetica Academy
Durban International College Pty Ltd X
Elite Learning Solutions
EQUALS International
Eynesbury College/Eynesbury Institute of Business and Technology/Centre for English Language in the University of South Australia/Eynesbury College Academy of English
Flight Training Adelaide
Flinders University
Gibaran Graduate School of Business Pty Ltd
Hosanna International College
Imperial College of Trades X
Institute for the Nations - Australia
International College of Cosmetic Technology X
International College of Hotel Management X
International Wing Chun Academy
Le Cordon Bleu Australia Pty Ltd
National College for Athletic Performance X
Nursing Industry Skills Centre X
Paradise College of Ministries
Quality Training and Hospitality College X
Salford College X

4

Sheffield College X
South Australian Government Schools
South Australian Health Education Centre
South Australian Institute of Business and Technology (SAIBT)/CELUSA
Southern Cross College of Vocational Education X
Southern Cross Education Institute X
Tabor Adelaide
TAFE South Australia
The University of Adelaide (Adelaide)
Trison Business College
Unitech Institute of Technical and Further Education Pty Ltd X
Universal Network of Infotech Pty Ltd X
University of South Australia (UniSA)

Appendix 2

'The International Student Experience in Australia'

Keynote Address provided by Professor Dean Forbes
Deputy Vice-Chancellor (International), Flinders University
Australian Universities Quality Forum
Alice Springs, 1-3 July 2009

When I began preparing this presentation earlier this year, I sketched out the parameters and then dutifully started to plough through the various bits and pieces of legislation and good and bad practice in dealing with international students.

Then, in late May reports surfaced of an Indian student assaulted in the western suburbs of Melbourne. A tsunami of activity rolled across Australia. The Prime Minister, the Leader of the Opposition and several Federal and state politicians released press statements deploring attacks on students. Suddenly, the international student experience was the issue of the day. Student safety was the focus, and the international student experience (ISE) had become the hottest issue in international education. More about that later.

Defining the international student experience

If you think back to your days as a university student, the current international student experience might be something that it is better not to know too much about. For undergraduates, at least, it is a time for new experiences and, hopefully, growing up. There are many ways to do that, most involve risks, and not all are strictly legal.

But universities have duty of care responsibilities towards their students. They also strive to provide a quality student experience, mindful of the importance of overall student and graduate satisfaction in building the universities' reputation and attracting future international students.

Australian universities generally do a reasonable job. The AEI 2007 survey of international graduates found that 81% were either very satisfied or satisfied with studying in Australia. Some 83% would recommend studying in Australia to friends or family.

There are two important issues of definition regarding the ISE.

First, for some, a narrow definition of student experience applies. The university's focus should essentially be on the student's formal learning experiences and their overall experience of university life.

For others, it is nothing less than the student's entire engagement with the university from initial contact, through recruitment, arrival, learning and university experience, graduation, employment, and their experiences as alumni. In addition, it includes their living arrangements, accommodation, safety and security, part-time work, and social inclusion. Universities are not directly responsible for all these matters, but are generally engaged in most of them.

The second key aspect of the ISE depends on whom we are referring to as international students. Mostly the ISE refers to full-time students enrolled in award programs in Australia.

However, universities also have international students undertaking short non-award courses, offshore students, and students studying on-line or in other forms of distance education. And also, of course, our domestic students travel abroad and hence become international students after they depart the country.

The experience of each of these categories of students deserves attention. But not here. I will confine myself to onshore international students, as these overwhelmingly represent the largest number of Australia's international students.

Student safety and the student experience

The international student experience tsunami that rolled over Australia from late May this year was something that many in the sector had feared.

Why? In 2003 some problems with a few English language colleges in New Zealand had resulted in the Chinese government posting on a website warning to prospective Chinese students about studying in New Zealand. The result was New Zealand experienced a calamitous decline in Chinese students. The experience drove home a key point: one or two local incidents involving international students can have severe repercussions for the whole education sector.

Concerns about the experiences of international students in Australia have been brewing over a number of years. Worries have ranged across several issues affecting sustainability, but inevitably including student housing, employment (both as a student, and after graduation), social inclusion and safety. The interconnections between these four dimensions of an international student's life are critical.

A Victorian government Overseas Student Education Experience Taskforce, worried about the rapid growth of Victorian international students in VET, produced a report in late 2008. The NSW Government followed establishing a Ministerial Taskforce on International Education in November 2008, which is expected to report in August 2009. The South Australian government convened a Taskforce on the Overseas Student Experience in May this year.

Momentum increased in 2009. The National Union of Students (NUS) called for a government inquiry in April, and the Greens announced in May that they wanted the Senate to launch an inquiry.

The Deputy Prime Minister (DPM), Julia Gillard, in a significant post-Budget statement on international education on Tuesday the 26th of May, also zeroed in on the international student experience. She noted media reports on student safety, and also expressed concern about an incident in her own electorate.

Three announcements formed the backbone of Gillard's statement.

- The Federal, State and Territory Joint Committee on International Education would look at measures to enhance the student experience
- Student representatives would be invited to a Round Table with the DPM to discuss key issues such as accommodation, safety and welfare, which would be brought to the attention of the inaugural Ministerial Council on Tertiary Education
- The Education Services for Overseas Students (ESOS) Act 2000 would be reviewed in 2010-11.

Universities Australia welcomed the DPM's announcement the following day (Wednesday 27th May), adding that Senate support for the Student Services and Amenities legislation before Parliament would enable universities to further enhance the facilities supporting the student experience.

However, the issue suddenly heated up when, during the same week the DPM made her statement, a series of stabbings, including of Indian students, occurred in Melbourne. The incidents, accompanied by television footage of the wounds to one student, received wide press coverage in Australia and India.

The impact was sufficient that on Friday the 29th of May Prime Minister Kevin Rudd spoke to Manmohan Singh, his counterpart in India, assuring him that Australia welcomes Indian students and the Indian community in Australia.

However, momentum was building. A group of Melbourne's Indian students held demonstrations over the last weekend in May. The protest was eventually broken up, with some force, by the Victorian Police, and the footage appeared on television.

News stories shot around the world and received significant coverage in national Indian newspapers. In the words of A.K. Tareen (2nd of June), the South Australian representative in Chennai, 'the newspapers here have dedicated the front page to report on these incidents for nearly a week now, [and] the TV channels have been running almost round the clock programs dedicated to the incidents...worried parents breaking down on TV has further kicked up mass hysteria leading to a number of protest marches in New Delhi, Mumbai and elsewhere'. Tareen's description reminded me of the Australian press coverage of Schapelle Corby's arrest.

Stories of attacks over a long period of time were said to indicate a lack of action by government, and as evidence of anti-Indian racism in Australia. Some Indians wrote letters to newspapers pointing out the violence against foreign tourists in India and suggesting the press was over-reacting, but it failed to affect the saturation coverage. Australia's international education competitors started spruiking how safe it was to study in their countries.

Media reporting in Australia also increased, centred on stories of more widespread concern about the plight of international students, tempered in some cases by reporting of initiatives, such as the proposed Roundtable, designed to deal with student concerns.

New initiatives were announced, and existing activities given a new urgency. Stephen Smith, the Minister for Foreign Affairs announced the establishment of a Taskforce chaired by the National Security Advisor, to coordinate the government's response to the crisis. The Victorian government announced it was speeding up the implementation of its 2008 Taskforce's recommendations, and the Victorian Police established a community reference group to get a better understanding of the problem and liaise with the Indian community in Victoria.

The university sector also stepped up its activity. Universities Australia (UA) released a Discussion Paper, commissioned in early 2009, that would form the basis of new guidelines for enhancing the student experience and student safety. The UA Deputy/Pro Vice-Chancellors (International) Committee met with heads of diplomatic missions in Canberra on the 4th of June, and the next day prepared the *Universities Australia Action Plan for Student Safety*.

The International Education Association of Australia (IEAA) and AEI (Australian Education International) accelerated work on their project on good practice in enhancing student well-being outside the learning environment.

But press coverage continued. Indian students in western Sydney marched over the following weekend demanding additional support, and street demonstrations continued for days (the 7-9th of June).

Up until this point the focus had been on Melbourne and then Sydney. On Thursday the 11th of June I attended a late afternoon meeting at Education Adelaide, along with a range of people from government and education institutions. News came through of an incident in Rundle Mall, the major shopping street, in which an Indian student was punched in the face, and taken to hospital. An education reporter from *The Advertiser* had witnessed the incident, and had summonsed a photographer. The next morning's front page featured the story, and another story accompanied by a photograph, in which an Indian student's car had been torched.

The NUS released a report on the 11th of June titled *International Students' Security and Safety Needs in Australia*. A week later, on the 18th of June, the Senate's Education, Employment and Workplace Relations References Committee announced it was to launch an inquiry into several aspects of the international student experience, and headed by student safety. It is due to report on the 16th of November 2009.

If the success of the Australian response is to be measured by the number of taskforces, inquiries, and public statements by politicians then the score would be a perfect 10.

International Students' University Experiences

So, what went wrong in Melbourne? Why did it so rapidly escalate into a national and international issue? What does it tell us about university and sector-wide quality assurance frameworks?

There is a widely held perception that a significant factor in the Melbourne events was the rapid growth of international students, particularly males of Indian origin, in vocational and technical education (VET) colleges in Melbourne in 2008. This, it is argued, created an unsustainable situation, and not just in Melbourne and Sydney. In Adelaide international students in the VET sector increased by 77% in 2008, with a significant component of that in new private VET colleges. Indian students increased by 78%.

It would be a mistake, however, to assume that this is a full explanation. Nor can we step back and say the incidents are isolated, or simply no more than might be expected given the large numbers of international students living and studying in Australia.

We need to acknowledge that there are underlying problems that must be addressed. For example, an on-going challenge for Australian universities is to improve the interaction between Australian and international students. The 2006 AEI survey found that 81% of international students would have liked more Australian students as friends. Almost half thought Australian students were not interested in being friends with international students.

Australian universities are subject to a complex web of regulatory and quality assurance arrangements with regard to international students.

The center piece for universities is the Education Services for Overseas Students (ESOS) Act and the National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students. First implemented in 2000, the National Code of Practice was reviewed and updated in 2007. The Department of Education, Employment and Workplace Relations (DEEWR) also undertakes regular audits of university compliance with the provisions of the ESOS Act.

The decision by the government, without any consultation with universities, to again review the ESOS Act indicates it believes changes are necessary, particularly in the context of the government's intention to transfer responsibility for ESOS from DEEWR to the new Tertiary Education Quality and Standards Agency (TEQSA).

In addition to government, universities have a collective position on international students. Universities Australia has a long-standing Code of Practice for the Provision of Education to International Students. It includes a brief mention of living arrangements, including accommodation, social customs and mores.   Its primary orientation, however, is to the core practices of universities rather than the broader international student experience. It needs to be updated, embracing a more comprehensive definition of the student experience, if it is to remain relevant.

One way of looking at how universities monitor the international student experience is captured by the expression 'if you can't measure it, you can't manage it'.

There are overall measures that primarily focus on teaching and learning, such as the Course Experience Questionnaire (CEQ) and the Graduate Destination Survey (GDS). International student data can be extracted and broad patterns of student satisfaction measured. AusAID students undertaking university courses are regularly surveyed. The AEI survey of international students in 2006, and the follow-up survey of international graduates in 2007, also provides some insight.

A recent mechanism for systematically collecting international student's views is the annual survey known as the International Student Barometer (ISB). The ISB data covers 69 variables which are clustered into four categories: arrival, learning, support and living. The survey statistics are supplemented by a considerable body of student comments from the survey, enabling a reasonably nuanced understanding of students' views to emerge.

Flinders University participates in the ISB survey. It enables us to benchmark Flinders performance against the other five universities that are members of the Innovative Research Universities (IRU) group, and over 100 international universities that use the ISB. In the 2008 ISB survey Flinders had the highest level of overall student satisfaction among the 102 world universities surveyed, ranking number one in satisfaction with overall arrival and support services, 2nd in overall satisfaction with living, and 3rd in satisfaction with the learning experience.

The ISB has this year been extended to transnational education students, with a pilot survey for 10 universities, five of which are IRU members. Preliminary results suggest that the survey instrument needs further development before it will be able to provide reliable information of comparable quality to the onshore student survey.

Because internationalization more broadly is such an important dimension of Australian universities, and also an area of risk, it has been an important focus of the Australian Universities Quality Agency (AUQA) activities. AUQA's review of internationalization in Cycle I audits noted the significant number of commendations of international student support services.

The report concluded positively that 'the universities are proactive in identifying and responding to the support needs of onshore international students, and addressing risks to the success and satisfaction of international students' (Stella and Liston 2008 p 28).

Initially at least, AUQA's Cycle II audits have generally included internationalization as one of the two major audit themes. This helps ensure that universities quality assurance processes around the international student experience will receive some attention.

International students in the community

In large part the processes I have referred to thus far focus more on the international student's experiences at university, and things associated with university life, rather than broader experiences in the cities and towns of Australia.

The locus of concern in the case of the Indian students early this year was dissatisfaction with aspects of living in Australia, particularly student safety. Regular reports of often-unreported assaults at train stations in parts of Melbourne have been widely known about for at least the last couple of years. However, this must be put in perspective. The AEI 2006 survey found that 77% of higher education students felt they were treated with respect and courtesy by people in Australia, such as neighbours, shop assistants and landlords. Of course that means that up to almost one quarter thought otherwise.

Universities must, quite properly, take a share of the responsibility for improving international students' experiences in the community. Many, if not all, universities have in place activities that seek to help students with their living arrangements. These include pre- and post-arrival information; assistance with finding accommodation and part-time work; seminars about life in Australian cities and the services available; the location of religious facilities (e.g. mosques); and briefings on safety issues by local police. One of the challenges is attracting students to these information events; young males, in particular, are often reluctant to participate.

Student organisations both on-campus and off-campus also have a role. Until the introduction of voluntary student unionism, the National Liaison Committee (NLC) for International Students was an active, though not always effective, participant in international education. In 2008 a new group took control of the NLC, with a primary focus on the safety of international students. However the new-look NLC has not managed to secure the confidence of the universities.

The National Union of Students Inc (NUS) has stepped up its engagement with international students. It has made public statements, met with officials, endorsed rallies supporting international students and, as mentioned earlier, called for the Senate inquiry and produced the *International Students' Security and Safety Needs in Australia Report – 2009.* NUS and CAPA, the Council of Australian Postgraduate Associations, also held the *2009 International Student Forum: Exploring Domestic-International Student Engagement* in Melbourne from the 28-30th June. Hopefully NUS will become a clear and thoughtful voice for international students.

The benefits of having international students in Australia are sufficiently large and spread across many areas that the responsibility for the student experience rests partly with all three levels of government, and partly with the community itself.

Perhaps the weakest links in the chain are the mechanisms for connecting students with the local communities in which they live. More sophisticated partnership models are needed to improve these aspects of the international student experience.

Case Study: Education Adelaide

Education Adelaide is a very good example of the way two tiers of government and the universities have worked together to address a range of issues associated with the international student experience.

Education Adelaide's initial focus was attracting international students to Adelaide. A re-thinking of its role took place in 2003, and a new strategic approach was developed and implemented in 2004. Two of its three strategies continued to focus on the consistent branding and promotion of Adelaide as a place for international students.

The third strategy was to strengthen Adelaide's reputation as an education city by building and supporting closer connections between international students and Adelaide's communities. Some initiatives are directed at the Adelaide community, because the support of international students by Adelaide's residents is critical to sustainability.

There are around 30,000 international students in Adelaide. Education Adelaide can only directly deal with a small proportion of them. It is effective for three reasons.

First, it complements what the universities are able to provide to their international students.

Second, it has been able to build partnerships with a wide range of organisations in the community on behalf of all the education institutions.

Third, it provides a regular forum for decision-makers in government and the universities to discuss city-wide issues associated with international students, including concerns about wayward providers, and it has a direct line to the Minister and the Premier.

Thinking ahead

The last few months have underlined the risks of accepting larger and larger numbers of students. Our cities are struggling to keep up with the provision of suitable living, studying and working environments. And when bad things happen, student concerns spread globally and rapidly through twitter, photographs on mobile phones, and email.

A key issue confronts federal and, perhaps more importantly, state governments. It is not a dilemma, but what Douglas Adams and John Lloyd call an 'abalemma: the agonising situation in which there is only one possible decision but you still can't take it.' Australia's international student numbers have grown extremely fast for more than a decade. Now is the time to shift our focus from growth to sustainability. Invariably that means asking hard questions about tradeoffs between growth and the quality of education provided.

In parallel, significantly more effort must go into ensuring improved student safety, which means dealing more effectively with closely connected matters including housing, employment and social inclusion. In recent years, an increasing proportion of the university and VET students are intending to get a job and stay in Australia. If students are unable to get jobs whilst they study, or if graduates struggle to build the careers they expected, we will have created an unstable and unhappy group of young people.

We also need to think about whether there is a distinctive Australian experience for students. Something that is more enduring than access to sandy beaches and the internationally acknowledged quality of life in Australia's cities.

In Australia, we want to build prosperous knowledge cities. Universities have a key role. So too do international students. They contribute to building the knowledge base, both as producers and consumers of knowledge. And they have an increasingly vital role underpinning the economies of our cities. Governments now know a lot about the economic impact of students. They know far less about the significant role that international students have in building the knowledge base of our universities, and very little at all about how to support the building of a connection between international education and Australia's aspirations to create a high-performing knowledge society.

We must think more strategically about how we can encourage more inclusive, knowledge-rich cities. Cities that both benefit from the diversity of knowledge resources that students bring to Australia, and at the same time, create a more stimulating, tolerant and inclusive environment for international students. If we could get this right it would assist the universities to provide international students with a distinctive Australian experience.

Appendix 3

International College of Hotel Management (ICHM) submission

Gerald Lipman
International College of Hotel Management
Email glipman@ichm.edu.au

ICHM's position in the Education Sector is that of a niche high quality provider. It is a private provider, although works closely with TAFE SA, that contribute lecturers and facilities on a fee-for-service basis. In 2008-9 the college has more than 500 students, of which about 80% were international.

Fees for Australians and Overseas students are higher than TAFE fees, and higher than a lot of the other private providers, although they are comparable to fees charged by institutions who are members of Association of Australian Hotel Schools (see www.aahs.com.au)

Student safety

ICHM has a detailed contingency plan to deal with safety eventualities. On average the college has 3-4 incidents each year, and it reviews the plan after each incident to ensure staff involved is aware of the contingency plan and act appropriately.

The type of incident includes assault, car accident, work accident, medical incident (asthma, allergic reaction, wound). Presentations on sexual health are given each semester.

Adequate and affordable accommodation

ICHM provide accommodation for students on campus. The distance from bedroom to classroom is about 300 metres. There are more than 180 students living with on campus. There are normally about 50 students living off campus as well. The Student Welfare Manager assists students find off-campus accommodation.

Some students find college accommodation (which includes three meals a day, computer on desk, internet access and 2GB a month, etc) to be too expensive. When students go to undertake internships in hotels they invariably move away from Adelaide. They must arrange accommodation in a new city. ICHM provides advice to these students.

The ICHM prospectus includes details on the accommodation cost on campus as well during internships. The college insists students sign that they have read the prospectus on application, and one reason ICHM want to work with education agents who already have a relationship with the college is to avoid students arriving in Adelaide with unexpected surprises.

Student visa requirements

ICHM ensures that marketers, administration and lecturers are aware of the student visa regime. The college monitor Education Agents to ensure they give correct advice, but since ESOS 2007 there has been no need to cancel one agent agreement for inappropriate behaviour.

Adequate international student supports and advocacy

ICHM has a Student Welfare Manager on campus, and with a goal of providing a prestigious college with up to 80% international students the college is able to provide a Recreation Activity Officer with funding for activities, Student Representative Council, etc. These services are funded through general student fees rather than a separate levy.

Where disciplinary (or visa-relevant) action is required the Student Welfare Manager acts as advocate for the student.

Employment rights and protections from exploitation

While on campus students have limited time to work, as the ICHM program is intense. But the program includes six months work (internship) for each six months study. These are approved in the course accreditation, and are legitimate up to 55 hours per week (35 hours per curriculum and 20 hours per student visa rules).

ICHM staff acting as Industry Training and Development (ITD) managers, assists students to find their positions and review the work contract. Students specifically give approval to employer to release work details to ITD staff.

ICHM is in touch with the students with a weekly newsletter, and by phone on a monthly basis. The college visits most students once a semester to ensure they are well treaded.

Where there is a safety or well-being issue, ITD staff have approval to fly to students to provide assistance.

Appropriate pathways to permanency

ICHM has a Migration Agent visit campus each semester to review students' options. Additionally the college encourages students to fly to Sydney each year to attend the AAHS Careers Fair. On this occasion hotels from around the world are present to interview students and make job offers.

Appendix 4

**Australian Council for Private Education and Training's mission
Submitted by Joy de Leo, Director, ACPET (SA)**

The Australian Council for Private Education and Training (ACPET) is the national industry association for independent providers of post compulsory education and training, for Australian and international students, including Higher Education, VET, English Language Courses, Senior Secondary Studies and Foundation Studies.

Its aim is to enhance quality, choice, innovation and diversity in Australian education and training for individual, national and global development. It works proactively and cooperatively with government, education and training providers, industry and community organisations, in order to ensure that vocational and higher education and training services provide choice and diversity, and well-targeted, appropriately delivered courses which are widely accessible and of high quality.

Whilst ACPET is not a regulatory agency, it seeks to promote accountability and compliance with state and national regulatory requirements, among private registered training providers through a range of measures, including capacity building and collaboration with regulators.

During 2008 the ACPET National Board approved revised membership processing arrangements that led to the introduction of risk management principles governing admission to the ACPET Tuition Assurance Scheme. These seek additional assurances from prospective members and refuse membership to those who do not meet entry requirements. These measures are seen as a way of protecting and supporting the vast majority of private education and training institutions that provide high quality education and training in a rewarding and supportive environment.

Recommendations regarding monitoring private VET providers in SA

Whilst the media have focused on private VET providers, the seven areas of the Senate Inquiry have equal relevance to universities and public providers.

Safety is important for all students, domestic and international, in all education institutions, since offenders do not restrict their attacks to students of private or VET institutions. Equally, issues relating to social inclusion, affordable and accessible accommodation, student visa requirements, student support and employment rights are of concern to all education and training institutions, both public and private. Targeting specific sectors would be discriminatory and misleading. Isolated incidents concerning the safety of students have been identified in all sectors including TAFE and Universities.

It would be erroneous to assume that all private providers (VET or otherwise) have failed to observe the rigorous requirements and quality standards governing the sector. Quality monitoring should be equally rigorous for all education and training providers, particularly on initial registration, but also regularly thereafter, based on a risk assessment, as per current practice. Current AQTF requirements adequately cover the areas of concern. Therefore, increasing regulatory requirements is not the answer. Rather, improved and nationally consistent enforcement of existing requirements is the key.

The audit process may need to examine more closely issues relating to quality training delivery and assessment, the nature and extent of staff experience and number of delivery hours. There may also need to be a closer connection between the courses endorsed for delivery (i.e. scope or training provision) and the capacity of the market to provide adequate opportunities for work experience and placements, necessary for course completion.

One area that should be considered by regulators is the capacity of providers to deliver training to a diverse student group. This could be identified by enforcing the existing requirement that providers need to demonstrate capability. If providers were required to demonstrate a period of operation in which they successfully delivered programs in the domestic market before entering the international market, that would serve to ensure provider capability and safeguard Australia's international brand for quality.

ACPET student survey (*I-graduate*) — The International Student Barometer

ACPET is currently seeking registrations from private providers to engage their students in the survey. It is anticipated that students will undertake the survey on-line in late August and that results will be available in September this year.

Monitoring the workplace rights of private college VET students *AND* ACPET initiatives to ensure regulation and education quality compliance

As mentioned previously, ACPET is an industry association that provides services to the education and training organisations that are its members, and not directly to students.

ACPET is also not a regulatory body. DFEEST is the regulatory body with responsibility for monitoring compliance with AQTF and CRICOS requirements in South Australia, delegated from the SA Training and Skills Commission.

Under the National Code of Practice, it is the responsibility of all CRICOS registered education and training organisations to ensure students are aware of their rights and responsibilities, and to provide a wide range of student support services.

ACPET's role is to provide information services and professional development for capacity building for its members, sometimes in collaboration with other agencies such as DFEEST, Education Adelaide, the Training Advocate and ISANA for example.

Successes SA ACPET has had in dealing with international students

ACPET does not generally have dealings directly with international students, except when relocating students in the case of a college closure, of which there have been none in South Australia to date. However, ACPET has developed the capacity in Adelaide, as in other states, to handle college closures and student relocations quickly and efficiently, while minimising student anxiety.

Many of our members have been in the industry for a long time and have developed high standards, both in terms of quality delivery of education and training and in the provision of student support services.

ACPET is a national body and provides a wide range of services for members including a comprehensive weekly national newsletter, regular professional development and information sessions.

So far this year, the following sessions have been conducted or are planned for CRICOS providers in South Australia:

28 April   What the Training Advocate can do for you

14 May   ACPET Learning and Assessment Workshop

12 June   ACPET/Training Advocate/ISANA/Education Adelaide, *Working together for the Wellbeing of overseas students*

16 June   ACPET Workshop – Working with Industry

19 June   ACPET Recognition of Prior Learning Workshop

22 June   ACPET International Education Forum

5 Aug   ACPET Student Safety seminar

21 Aug   ACPET - Offering VET for school students

24 Aug   ACPET - CRICOS VET & ELICOS members working together for the well-being of overseas students – *On-arrival orientation*

4 Sept   ACPET/ISANA – Higher Education CRICOS providers working together for the well-being of overseas students.