

26<sup>th</sup> April 2012

**Submission to  
Senate Legal and Constitutional Affairs Committee  
Inquiry into Migration Legislation Amendment (Student Visas) Bill 2012**

We appreciate the opportunity to make this submission.

We support the Knight Report recommendations 23, 24 and 25 that mandatory visa cancellation should be removed, and more discretion given to the Department to consider all aspects of individual cases. This is consistent with the philosophy of proportionate risk-based regulation, and provides a more considerate treatment to individual students. For these reasons we support the provisions of the Bill to enact the recommendations.

We understand the need for the Department to be able to contact students for a variety of reasons, including when they are reported by providers through the PRISMS system for non-compliance with their visa. We support the requirement for providers to proactively maintain student contact information on their student databases, which reputable providers would do already, though some of our colleagues have expressed the view that it is primarily the responsibility of the Department to maintain a database relating to visas that they have issued.

Our major concern with the Bill is the proposed requirement for providers to enter manually on the existing PRISMS system the contact details for accepted students within 14 days of being notified of a change. At present providers will enter the student address only when reporting a change to a student's enrolment, or issuing a Section 20 notice. They do not currently enter on PRISMS the address for all students, although they would hold this information in their management systems. The proposed change would create a major increase in administrative workload; some typical colleges with 500 – 1500 students estimate the additional reporting will require an extra 0.5 to 1 FTE staff to fully comply, at a time of downturn and shrinking resources.

The problem arises from the need to manually enter the data on the antiquated PRISMS system; it currently does not upload data automatically in the way, say, HEIMS does from provider databases, under web services communication protocols. PRISMS needs to be modified to be capable of uploading directly from provider databases the student contact details and any other information required by the Department.

Following is an extract from the COPHE submission to the Baird Review (#37):

*Reporting should use existing systems, modified as necessary, such as HEPCAT which already collects much of the necessary data for the administration of HESA. We believe current student record systems in higher education that interface to HEIMS via HEPCAT can already capture all the student data required for ESOS purposes.*

*Missing or incomplete student records compromise the ability to place students quickly and fairly. We need robust recording and reporting systems so critical information is immediately available in a TPS activation. We refer to our earlier comment that universities and higher education providers already maintain these records in systems that interface to HEIMS through HEPCAT at census dates.*

Similar considerations should apply to reporting systems in other sectors. Some smaller providers may not use automated systems that PRISMS would access; these providers may prefer to enter the information manually rather than invest in new data systems. However for large providers with potentially compatible systems, PRISMS needs to be updated to automatically upload using web services before the proposed reporting is enforced.

On a related issue, we urge Government to implement the Knight recommendation 31 to establish a single identifier to track students through their studies. Currently all domestic higher education students are allocated a unique Commonwealth Higher Education Student Support Number (CHESSN). In fact we encourage Government to go further, and extend such an identifier to facilitate meaningful data collection nationally across all students and sectors, including tracking of students through various pathways. We note that Victoria has already introduced the Victorian Student Number (VSN) for all school and VET enrolments.

In summary:

1. We support the Knight recommendations for the removal of mandatory visa cancellation
2. We support in principle the provision of student contact details to the Department, provided systems are in place to mitigate the administrative load on providers
3. We urge the Government to update PRISMS as a matter of urgency so that it is capable of downloading information directly from provider databases, without laborious manual entry
4. We encourage the establishment of a national student identifier to track students, and provide better information and intelligence.

## **About the Council of Private Higher Education (COPHE)**

The COPHE constituency sits unambiguously in the higher education sector, offering courses taught and accredited as being equivalent in level to public sector universities. Under TEQSA the sector now has a single national regulator.

COPHE members, while diverse in size and educational focus, focus on provision of quality higher education. Institutions are student-centred, often have smaller student-to-staff ratios than larger public universities, and provide opportunities for flexible and accelerated learning. Offering courses in niche discipline areas, members are committed to particular professions and have strong employer links.

International students for some COPHE members form a large proportion of their enrolments and for others the international student numbers are small but reflect a perceived need for cultural diversity and support of their broader community or mission.

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