



30 October 2019

Dear Dr Thomson

**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]**

Thank you for alerting the Australasian VET Research Association (AVETRA) to the opportunity of making a submission to the Senate Education and Employment Legislation Committee on this important legislation to protect VET and Higher Education students through new government administered Tuition Protection schemes

AVETRA is Australasia's only national, independent association of researchers in vocational education and training (VET). It was established in 1997 with initial financial assistance from the Australian National Training Authority Research Advisory Council, and the organisation and its members researchers have a close relationship with the National Centre for Vocational Education Research (NCVER). As such we take a keen interest in tertiary education policy developments and believe good research can improve VET and skills development in Australasia.

AVETRA is broadly supportive of the new proposed arrangements. We agree it is better for students to be protected by government-run rather than provider association schemes as happened to date. The difficulties with the former VET FEE-HELP income contingent loan scheme stretched the capacity of these associations. We note, however, that the scheme does not cover students who have paid their fees up front. They will only have recourse to ITECA or the ACCC dependent on the level of the course fees paid. We would hope any impact of this provision, or the lack of it, is part of any future review.

More generally, we would like to state that government policy would be much improved if there was more support for, and use of, VET research. The former program of research called NVETRE that was administered by the National Centre for Vocational Education Research produced a very strong body of policy-relevant research, undertaken by researchers independent of government, that was communicated to governments and to practitioners. The body of researchers in VET grew as a consequence, able to advise government on policy and practice matters in VET. Australia was regarded as among world leaders in this respect.

However partly due to the withdrawal of the NVETRE research funding source, there are now fewer VET researchers and in recent policy matters there has been less structured consultation between the Commonwealth and AVETRA than there used to be. This can lead to the

impoverishment of policy development, Researchers have a great depth of knowledge in their fields, can draw on overseas developments and are able to take an independent stance. So, in relation to this particular matter, the Australian National Audit Office report on VET FEE-HELP noted the rapid expansion of VET FEE-HELP following the Grosvenor Consulting Report recommending expansion. Had a group of researchers expert in the training market been consulted, it is likely that the problems that later ensued would have been identified as risks. Researchers would also have been able to contribute to data on the ongoing development of the scheme had they been included in this way.

Individual researchers who are AVETRA members have written papers and presented at AVETRA conferences on VET FEE-HELP. These include Don Zoellner, Damian Oliver and Erica Smith. All three are also active in policy areas. You may like to view AVETRA conference papers at <http://www.avetra.org.au/pages/publications-conference-archives-46.html>

In conclusion, we feel that in general VET research should be encouraged through involvement of researchers via AVETRA in government consultations; and should be engaged in this manner specifically in relation to the VSL's ongoing operations. We also request, more broadly, that consideration should be given to the re-institution of the NVETRE program of independent VET research.

Yours sincerely

Robin Shreeve

President, AVETRA