



Committee Secretary
Senate Education, Employment and Workplace Relations Committees
PO Box 6100
Parliament House
Canberra ACT 2600
Australia
eewr.sen@ph.gov.au

RE: EDUCATION SERVICES FOR OVERSEAS STUDENTS LEGISLATION AMENDMENT (TUITION PROTECTION SERVICE AND OTHER MEASURES) BILL 2011 AND THE TWO OTHER ASSOCIATED ESOS BILLS

Dear Sir/Madam,

These Bills propose a change to the way education providers are allowed to deal with tuitions fees. There are two elements to these changes:

- i) limiting the amount of pre-paid fees that providers can collect: and
- ii) introducing a requirement for providers to place the initial study period fees into a designated account

Whilst understanding the policy intent of this proposal, the International Education Association of Australia (IEAA), as with other peak bodies involved in the sector, questions the need for both of these requirements to be introduced whilst one on its own (changed slightly) would have the required impact.

The aim of i) above is to minimise the amount of refunds that might be required, whilst the aim of ii) above is to ensure that funds are available to provide refunds.

This would seem to be a duplication of regulation that is not only unnecessary but that has the potential to cause a range of associated issues that could be avoided.

The IEAA therefore supports English Australia's Recommendation 1 in its supplementary submission to the Senate Committee as follows:

That the Committee considers amending 'Schedule 3 – Pre-paid fees', to amend the proposed limit on pre-paid fees to a maximum of 50 weeks, as long as these fees are held in a designated account to be drawn down only when each study period commences.

The IEAA would similarly argue that if pre-paid fees are required to be held in a designated account, with the fees only available to be drawn down at the commencement of each study period, then this alone would meet the policy intent.

Yours sincerely

Phil Honeywood
Executive Director
International Education Association of Australia