



20<sup>th</sup> November 2015

Ref: Higher Education Support Amendment (VET FEE-HELP Reform) Bill 2015

We are grateful for the opportunity to be able to comment on the VET Fee Help Reform amendments on behalf of the Community College Australia member colleges. Though Community College providers make up a small percentage of VET Fee Help deliverers, we believe that we make a significant contribution to the program in terms of providing quality Vet Fee Help opportunity for students in rural and regional areas. We pride ourselves on the support we offer our VET Fee Help students in giving them the best possible chance of success.

In regard to this current enquiry, we have the follow comments.

We recognise that the “Cooling off” period is critical to the decision-making and risk mitigation process for students, and of that we are highly supportive. However, the suggestions regarding **Section 23C Subsection (2)-(4)** are administratively burdensome. We understand that the intention is to provide somewhat of an additional consideration period for students, however in practice it is very challenging to manage this both for providers and students.

From our understanding, the effect of this is that when a student completes all their enrolment paperwork, they must come back with or send in a Request for Commonwealth Assistance form no earlier than 2 business days later.

This is very unusual in any industry for a provider to be forbidden from 'receiving' paperwork - usually it is ok to receive it, but the student has the right to withdraw it during the “cooling off” period. The purpose of census dates is to provide a lengthy cooling off for students, so we think this amendment is excessive. In the Community education sector, our process is to give the student plenty of opportunity to analyse the options and determine if this loan arrangement is most appropriate for them, but we feel that this two day option will actually create greater challenges for students. It requires students to come back to the college or remember to put documents in the post, both of which are not always easy in rural environments. If the student is late or forget, they run the risk of not being able to access, or be delayed in starting their training. While we are wholly supportive of stopping the exploitative practices that seem to be occurring in the VET Fee Help space, we do not want to see students missing out due to excessive “red tape”.

We believe that the new requirement to send an invoice to a student on enrolment with clear instructions is the most effective way to stress to students that they can withdraw before the census date without incurring a debt any time they like.

2) There are many sections with in the Amendment document that focus on student support, particularly in assessing the suitability of students. We support that pre assessment of suitability and provision of support for enrolled students is critical, and is an area in which Community Education providers excel especially in LLN, student support, and IT support pre assessment and during training. We also support for students who are not quite ready to engage in this level of training, enabling them to look ahead to being able to enrol when they have developed a greater readiness to



participate.

3) We concur that the civil penalties and monitoring arrangements proposed in the amendment document are all fair. It is vital that are severe penalties apply to those organisations choosing to abuse the VET Fee Help system, and consequently the students that it supports.

We are grateful that there is an opportunity for providers and Students to offer submissions before decisions are made on these critical issues. CCA member colleges that provide VET FEE Help are currently examining ways to develop protocols and systems to best support students wishing to engage in VET Fee help programs. We believe that a key area that should be addressed is the issue of appropriate students fees under VET FEE Help and we would like to offer CCA 's services in any further consultative arrangements going forward.

Best wishes

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CEO (interim)

Community Colleges Australia

### Background to Community Colleges Australia

Community Colleges Australia (CCA) is a member-funded peak body. It was formed in late 2006, recognising a need for an industry association at a national level to represent not-for-profit (NFP) community owned providers of adult and youth education, training and learning in a local environment. Our members represent over 60% of the VET delivery by NFP providers on the eastern seaboard of Australia. CCA's strategy is to have members from all states and territories within the next 3-5 years.

Membership comprises long established learning organisations located in metropolitan, regional and rural locations. The 'community colleges' are strategically placed to provide a focus on student welfare with commitment to the employment outcomes for, and personal development of, the individual.

CCA is committed to assisting our members grow their business and thereby to enhance the learning opportunities for all Australians through all stages of their adult lives. CCA promotes 'real education for today's Australians' by delivery that engages and belongs to local communities.

Our vision is for Australia to achieve more dynamic and vibrant communities, informed and empowered through learning.