



Chair:
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11 September 2009

Mr John Carter
Committee Secretary
Senate Education, Employment and Workplace Relations Committee
PO Box 6100
Parliament House
Canberra ACT 2600
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Dear Mr Carter

Education Services for Overseas Students Amendment (Re-registration of Providers and Other Measures) Bill 2009

Universities Australia is the peak body representing Australia's universities in the public interest both nationally and internationally. Universities Australia welcomes the Senate Inquiry into the Education Services for Overseas Students (ESOS) Amendment Bill 2009 and is pleased to offer the following submission.

The proposed amendment to the ESOS Act will require the re-registration of all Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) registered institutions. Through re-registration, the Australian Government has indicated it aims to restore confidence in the quality of education services for international students. The Bill also introduces provisions for two new registration criteria so that only those institutions demonstrating genuine purpose and capacity to provide quality education will receive re-registration. Universities applaud the intent and will work with the state and federal governments in the re-registration process.

It is vitally important this process does not place undue administrative burden on universities. Given the enormity of the re-registration task and the timelines proposed, we suggest that the best way of proceeding would be to conduct the process using a risk management approach. While the proposed process for universal re-registration

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has not yet been announced, a risk managed approach would direct attention to those institutions with a higher risk profile. A high risk profile could be characterised by:

- A high proportion of students from a single source country;
- Provision of a limited number of education programs (including those linked to future migration outcomes);
- A rapid increase in enrolments in the recent period;
- Previous breaches of the National Code; and
- A history of visa fraud in student visa applications.

The Amendment Bill will also require education providers to publish a list of their education agents. The Hon. Julia Gillard, Minister for Education, Employment and Workplace Relations has stated the intention of this aspect of the Amendment Bill is to make providers' use of education agents more transparent and accountable.

All Australian universities either currently publish a list of their agents on their websites, plan to do so as soon as practicable, or are open to doing so on an appropriate website.

Universities Australia would welcome an opportunity to contribute to further discussions, should this be desired. If you have any questions or comments regarding the attached material please feel free to contact Dr Glenn Withers, Chief Executive on (02) 6285 8104 or myself.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Peter Coaldrake', written in a cursive style.

Professor Peter Coaldrake
Chair