

Education and Employment Legislation Committee  
Education Services for Overseas Students Amendment (Quality and Integrity) Bill 2024  
[Provisions]

Public Hearing - 6 September 2024

Opening statement from Jim Davidson, Director, Photography Studies College

Thank you for the invitation to present today. I represent Photography Studies College (PSC).

We support the view being put by our colleagues that the Bill as proposed is of grave concern, particularly to us as a small niche higher education provider.

The way the 'total enrolment numbers' are conceived along with the 'methodology' proposed<sup>1</sup> will have the impact of a stray bullet reverberating through small private Institutes of Higher Education.

PSC has a 50-year history as a niche provider in the Creative Industries – delivering education programs in photography and digital media. Since 1993, we have focussed on fee-paying Australian students supplemented by a small number of CRICOS places for international students.

We now provide CRICOS approved courses at Undergraduate Certificate, Bachelor and Masters levels. Our source countries for international students are predominantly OECD and ASEAN members (currently Japan, Korea, the United States, Canada, Indonesia, Hong Kong, Slovakia and Italy). Since 2019, we have been approved by the US Department of Veterans Affairs to deliver funded bachelor's degrees to US veterans.

In March 2020 (*just as the pandemic took hold*) we opened a new purpose-built education and photographic facility in South Melbourne, demonstrating a substantial investment in facilities and commitment to the College's future.

In the past 4 years we have withstood the impact of Covid and the reintroduction of the 20% loan fee on our student's FEE-HELP loans and the resultant reductions in domestic student enrolments.

In 2024, the national regulator assessed our application and approved an increase in CRICOS places to 100 students.

We are one of a limited group of Institutes of Higher Education with up to 100 CRICOS places that are predominantly small, well known and long-established creative arts bodies that sustain their viability domestically with a number of international students.

We submit that the existing CRICOS caps established through the present ESOS legislation and approved by TEQSA are the appropriate basis for caps on international student numbers in our small institutions.

The 'methodology' proposed by the Minister to implement a 'total enrolment cap' for private higher education providers, does not take into account the individual circumstances of these small creative institutes and their reputations.

Should it proceed, we, our staff and students will be collateral damage which would represent an entirely unfair and discriminatory impact.

We believe that there are measures that could be taken to support our small sector.

Jim Davidson  
6 September 2024

<sup>1</sup> In correspondence received on 27 August 2024 from the Commonwealth Department of Education