

ATN Submission: Education Services for Overseas Students Consultation – online education and under 18 students

15 May 2023

The Australian Technology Network of Universities (ATN) welcomes the opportunity to provide a submission to the Department of Education on the Education Services for Overseas Students discussion paper covering online delivery and younger students (under 18 years of age).

Recommendations

Continue to consult with students and focus on student choice

1. Preservation of student choice should be placed at the centre of any changes to the ESOS Framework. Indeed consultation with representative student bodies like Council for International Students Association (CISA), National Union of Students (NUS) and Council of Australian Postgraduation Associations (CAPA) should be paramount when considering any changes no matter how minor.

Continue to be up to date on emerging technology

2. The ESOS Framework needs to adequately reflect the current operating environment of the sector to ensure it remains fit for purpose. Consideration should be given to potential wholesale changes to the ESOS framework to reflect current activity, rather than a piecemeal approach to different elements of the National code.

Further commentary

Online delivery

- a) What proportion online delivery is appropriate in the post-COVID environment?
- b) What other guidance for providers is necessary and sufficient to include in the National Code to ensure students continue to receive a high-quality student experience and education?

Standard 8 sets out the flexible provisions that allow for online learning while maintaining appropriate standards for overseas students to adhere with student visa requirements.

Given the gains in technology and digital learning in the last decade there have been pushes to ensure that this part of the National Code reflects the current learning environment available to overseas students studying at Australian universities.

Online learning in Australia is high quality and has a high reputational currency – as such any changes to this provision need to keep these facts at the forefront of their considerations. Whilst gains in digital learning have led many to call for increased flexibility, as a sector, quality assurance and enforcement of regulation are a top order priority.

COVID-19 was the biggest disruptor to Australia's international education sector in recent years. All universities took measures to pivot from face-to-face teaching modes to online teaching modes. It would be reasonable to expect that once the operational environment settled post-COVID that the regulator should embark on a quality assurance audit to ensure all online learning products in scope

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are of a high quality and contain commensurate learning outcomes when compared with other modes of study.

Australia has a world class reputation as a provider of high-quality education for all students – both domestic and international students. To ensure this reputation is protected – quality assurance and enforcement of regulation is important.

Once these have been established discussion on increasing flexibility in the online learning modes can then be discussed.

Typically flexibility in this context has meant an increase in the percentage of allowed online learning. Other factors to consider should include:

- how to incorporate work integrated learning for international students that does not impinge on their allowed work hours
- how to incorporate study by overseas students of short courses applicable to their discipline of study, but not a requirement of study.
- Consideration of the impact on post-study work rights
- Including capacity to study online in unique circumstances – where a student may need to return home for a variety of issues or as a way of ensuring progression if other interventions have not been successful.

“Interest in online study appears to have stabilised over the course of the pandemic, suggesting that around one quarter of prospective students hold serious interest in studying their course online, and around 40% are interested in a mixture of online and face-to-face study. As normal campus operations resume, institutions will need to consider how they balance on-campus studies with any continued demand for online – and potentially offshore – study options.”

QS Australia and New Zealand International Student Survey 2022

If adequate quality assurance measures and enforcement of regulation are implemented there will be a reduced need to provide guidance on student experience. The sector has adequate and well traversed frameworks in place for sharing best practice and knowledge exchange on a variety of themes of which student experience is one.

Additional protections for all younger overseas students

- a) Should the ESOS framework be updated to reflect the National Principles?
- b) Are there additional protections which should be included to enhance the culture of child safety and wellbeing for younger students within education providers?

Standard 5 in the National Code sets out the provisions designed to protect younger overseas students (under 18 years old).

5.1 currently reads - *Where the registered provider enrolls a student who is under 18 years of age, it must meet the Commonwealth, state or territory legislation or other regulatory requirements relating to child welfare and protection appropriate to the jurisdiction(s) in which it operates.*

It would be more appropriate to ensure alignment of obligation for all providers across all jurisdictions before implementing an additional layer of regulation.

National principles are currently reflected in some state jurisdictions and national alignment of these is a more worthy path to pursue than changing the current federal settings.

Consideration should be given to additional protections for younger overseas students particularly in online learning.