



Education Services for Overseas Students (ESOS) Review 2022

Submission form

Please use this form to provide your comment and return to ESOS-PolicyTeam@dese.gov.au by COB 29 April 2022

Title	
Name	
Position	
Organisation	
Email	
Sector of delivery (eg VET, higher education)	
Are you a member of an industry body? If yes, please specify	

I consent to this submission being published in full on the DESE website.

OR

I do NOT consent to this submission being published on the DESE website.

Questions are the same as those contained in the [Discussion Paper](#).

QUESTIONS	COMMENTS
Expansion and diversification	
1. What are the barriers in the current ESOS framework to the sector's expansion and diversification into online and offshore delivery?	
2. What lessons have we learnt through flexible delivery, online modes of study and other changes in response to the pandemic that could be incorporated into the ESOS framework?	
3. What percentage of a course should the ESOS framework allow to be studied online? How could the ESOS framework support delivery models such as mixed-mode study where students may move from ESOS non-regulated to a ESOS regulated environment (for example, a student studying part of their degree offshore, and part onshore)?	
4. What safeguards could be used to increase visibility and assure the quality of courses delivered online and offshore in the future?	
Meeting skills needs and graduate workplace readiness	
5. How could providers support international students to identify and undertake courses that align with Australia's priority employment fields?	

<p>6. What changes could be made to the ESOS framework to support providers offering a wider range of work integrated learning opportunities?</p>	
<p>7. What regulatory measures could be implemented to make study choices in occupations and areas of demand more attractive for overseas students?</p>	
<p>Supporting the quality of third-party relationships</p>	
<p>8. What kinds of measures to increase the transparency of third-party arrangements could be effective in improving student and provider choice?</p>	
<p>9. What are the effects of increasing transparency of agent commissions? Would transparency measures improve student and provider choice? Would they drive down high remuneration rates over time? What are other potential outcomes from increasing agent transparency?</p>	
<p>10. What information, such as education agent performance outcomes, can the Government make available to providers to help them decide the agents with which to engage?</p>	

<p>11. Should providers be required to have written agreements with all agents from whom they accept students, it could result in more information for students and improve data reporting on provider and agent activity. Are there any other positive or negative outcomes for students in this change?</p>	
<p>12. What information should written agreements between agents and providers contain to protect providers and better inform students and government?</p>	
<p>13. What is the potential impact on providers regarding increased administrative activity if they are required to monitor all agents?</p>	
<p>Course transfers</p>	
<p>14. How can the ESOS framework enhance optimal student choice and safeguard the ability of providers to deliver a quality education experience?</p>	
<p>15. How can the framework and providers ensure course packaging requirements are transparent to students and support student choice and wellbeing?</p>	
<p>16. What are the benefits to providers and students in restricting a student from changing providers within the first six months of their primary course, and what would be alternatives to support student choice?</p>	

17. Should 'concurrent study' as an option remain within PRISMS and if so, what provisions should be made to ensure it is not abused?	
18. What restrictions, if any, should there be on the transfer of adult international students where they wish to transfer between providers?	
Written agreements	
19. How effective are written agreements in consistently setting out and protecting the rights and obligations of students and providers?	
20. What measures could be introduced to increase transparency of written agreements, for the benefit of students and providers?	
21. If model clauses or model written agreements are introduced, what would they look like and how can they best be leveraged to reduce regulatory compliance costs and promote best practice in the areas of refunds, deferrals and transfers?	
22. How could refund regulations be revised to ensure consistency between providers and better reflect the different circumstances in which they may be requested?	
English language	
23. How can the ESOS framework better support students' English language skills to match their course	

requirements on the start of enrolment and ensure an optimal student experience for all students?	
24. Would it be beneficial to introduce an independent assessment of international students' English proficiency before they commence their first AQF course?	
25. How can PRISMS data entry requirements be adjusted to make it easier for providers to record evidence of a student's English proficiency?	
26. What additional guidance do providers need to ensure incoming students meet English language requirements?	
27. How can providers of ELICOS and Foundation Programs ensure that students have reached the required level of English language proficiency to start their first AQF course?	
General Questions	
28. How can the ESOS framework be strengthened and improved to deliver an optimal student experience?	
29. How can the framework resolve any regulatory barriers that prevent sector innovation, diversification, and growth of Australian education offerings, including online and offshore?	

30. How can the ESOS regulatory framework evolve to better support the sector to deliver a high-quality education experience?	
Any additional comments you wish to make?	