

RESPONSE TO PRODUCTIVITY COMMISSION DRAFT REPORT ON BARRIERS TO GROWTH IN SERVICE EXPORTS

Submission made by the



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via email services.exports@pc.gov.au*

RESPONSE TO PRODUCTIVITY COMMISSION DRAFT REPORT ON BARRIERS TO GROWTH IN SERVICE EXPORTS

The International Student Experience Association (ISEA) welcomes the Productivity Commission Draft Report on Barriers to Growth in Service Exports

The International Student Experience Association (ISEA) has been established to identify and act on issues and opportunities that protect and enhance the international student experience and appreciates the work undertaken by the Productivity Commission on attempting to protect and enhance Australia's export position on a global stage.

While ISEA supports all the recommendations in the Draft Report relating to international education, it is our submission that specific recommendations regarding the International student experience and services affecting this should be reviewed and amended and that a further recommendation related to these be added. Specifics of these topics are details below.

SPECIFIC ISSUES

The Commission has asked for the identification of domestic barriers that apply to service exports, what are the highest priority for reform, who should be responsible for driving the reform process, and costs and benefits of removing these barriers.

ISEA has identified following specific issues and possible initiatives to improve the IES sector.

1. Public Transport

The Commission should investigate the level of concessions available to international students for use of public transport.

Students on an Australian Student Visa should be able to receive the same subsidies as domestic students across all States without exemption.

2. Healthcare

As with public transport, ISEA believe international students should be provided healthcare on comparable terms as domestic students. The current situation is seen as discriminatory and provides a cost disadvantage to other study markets. Moreover, some state governments have adopted an attitude of viewing international student health expenses as a revenue "pot of gold". As previously stated, this sectional, short-term thinking is not helpful to the overall industry and will result in a reduced economic outcome over the medium to long term. At the very least state and territories should be encouraged to reign in their charges to international

students and make long term commitments to avoiding increases that are out of step with other price movements. In essence they should be restrained and consistent.

3. *Welfare Standards*

ISEA recommends that all international students arriving for the first time to study and live in Australia use the services of a professional standards based “Welcoming Hosted Accommodation” provider who can also organise appropriate Airport Pick Up services to ensure a safe and happy arrival experience.

Other recommendations include:

- all international students (over 18 years) make quality choices around initial accommodation to set them up for longer term housing solutions;
- students under 18 years must follow the accommodation advice of their Education Provider; and
- all students under the age of 18 should have welfare/advocacy support independent of education and accommodation provider.

Additional details on proposed welfare standards are shown in Attachment A.

4. *Homestay Standards*

The term Homestay is defined as the provision of residential accommodation using the existing homes of Australian residents. Unfortunately, despite a Senate Inquiry (2009) and numerous reviews calling for standards, there is still no consistent standard, with the international students exposed to considerable vulnerability and variability in terms of situation and safety.

A critical element in the improvement of Homestay in Australia has been the introduction of published Homestay Standards, which were first deemed appropriate by the Senate inquiry into the Welfare of International Students in 2009 (See sections 3.65 through to 3.71). Since then, The University of Sydney through its Centre for English Teaching has been instrumental in reviewing the Australian Homestay standards and for ensuring that standards for this very important part of the IES industry were validated.

The NSW Parliamentary inquiry into international student accommodation (2011) commended the University of Sydney standards for Homestay and recommended them for legislation. To date, many of our major Education Providers have committed to the published Homestay Standards as detailed.¹

¹ See: <http://www.homestaynetwork.org/homestay-standards>

ISEA has recommended these Homestay Standards apply across the country to ensure quality, student safety, consistency of services and positive consistent messaging to markets. There is a role for the Commonwealth government in making this a reality. As noted above, accommodation should be about appropriateness and value not 'affordability'.

5. Pre-departure Orientation

Orientation is often the first exposure a student will have to the Australian education system. Students who partake in thorough orientation programs prior to departure from their home country are more likely to integrate into their life in Australia more efficiently. An effective orientation program should be accessible to all international students and allow students to commence at different entry points, and cater for late arrivals. Such information should continue to be available students post arrival and for the duration of their visa. The ISEA believe these programs should include detailed information on the realities of life in Australia, addressing important environmental and local details as appropriate.

At a minimum, the topics covered in a quality pre-departure orientation program include: cost of living, work rights, accommodation options, transport, general visa conditions, health and safety, customs and quarantine information, Australian culture and key contacts, including an "after-hours" contact number.

The orientation program should be available in other languages as appropriate to assist with optimal understanding of the student and their family. Student understanding using audit checks as appropriate should be completed to provide further confidence to students, parents and education providers.

To make this happen, there should be reform to Education Services for Overseas Students Act so that the roles and responsibilities of education providers and agents are clearer and more specific in requirements.

CONCLUSION

Our initial submission made the following key points:

- International Education Services (IES) is a crucial industry sector with the supply chain as a whole competing with other nations. It should not be subject to the whim of sectional interests;
- the student experience should be seen as qualitative, holistic and interconnected especially by policy makers;

- current industry regulation is cumbersome and confused. A comprehensive standard of practice led by specific sectors should be put in place, while having regard for the qualitative aspects of performance;
- there are opportunities for the Commonwealth to give effect to immediate policy action that would send a strong signal overseas (e.g. equity on health care costs); and
- leadership at a national level in the form of a dedicated ministry would send a strong message and be effective in preventing sectional interests prejudicing the whole industry.

Appendix A: PROPOSED WELFARE STANDARDS

ISEA firmly believes welfare arrangements for international students are paramount for a strong and robust industry. We believe that standards of care across the sector need to be transparent, accountable and consistent.

- “Unsatisfactory welfare arrangements” is one of the top five risks listed in the Knight Review (2011) – a strategic review of Australia’s student visa program.
- Standard 5 of the National Code of Practice (2007) is very broad and is left open to interpretation by each individual education provider. As a result there is a wide variance of standards in relation to care and welfare for international students.
- Students under the age of 18 are our most vulnerable group and need to be protected. Independent advocates (not employed by education provider or accommodation provider or student agent) need to be exactly that – independent – to ensure the student is represented without favour or bias.

We believe the following standards should be adopted as the National bench mark for care and welfare of international students.

Students under the age of 18

1. Access to an online portal, which allows education providers the ability to access, audit and monitor the following information:

- Full contact details of student, home stay address, host contact details, student mobile number, student e-mail
- Full contact details of the parents, home address, home, work and mobile contact numbers, home and work e-mail (critical incident response)
- Full guardian details, name, contact number, image of working with children check card, blue card or clearance letter issued by the relevant state authority
- Details of each contact between guardian and student, summarising type of contact (phone or in person), date and time.

2. Compulsory Insurance

- Guardian service to maintain national professional indemnity and public liability insurance to cover duty of care for company employees, agents and sub-contractors engaged by the guardian service to provide services to students
- Copies of certificates of currency to be provided to education provider
- Recommended minimum cover is \$5,000,000 public liability and \$10,000,000 professional indemnity

3. Confirmed Training

- Documented training
- Online portal with mechanism to monitoring performance of each guardian, sub-contractor or agent providing services to students

4. Legal and Binding Contracts

- Guardian service to ensure all employees, agents, sub-contractors have legally binding contracts ensuring they will abide by standards of service
- Guardian service to sign agreement with education provider confirming compliance to set standards and service delivery

5. Documented Approach

- Guardian service to provide parents with documentation outlining services provided, cost of service, refund policy and process
- Signed copy of parents agreement to be available online for education providers to view if required
- Online access for the education provider to reports, letters of permission, travel itineraries other documents relevant to student
- Online access recording all contacts with guardian, student, parents, education provider or other party relating to the student.

6. Independent Process

- Guardian to be independent (not employed by the education provider, not the homestay host or employed by homestay provider, not the education agent or employed by the education agent)

7. 24/7 Emergency support and critical incident response

- Provide access to a professional 24/7 emergency response line for critical incident management and response if required

8. Accountable and Transparent Payments

- Online access to all invoices, creating an environment that is accountable and transparent

All International Students

ISEA also believes all international students regardless of age should have access to an independent advocate to represent them if required. This service should be free to all international students, the cost of maintaining the service should be incorporated into the student's annual fees (Approximately \$6 per annum per international student). Services provided by independent advocate should include 24/7 independent representation and personal consultation in relation to:

- Critical Incidents
- Legal advice referral
- Cultural awareness and integration
- Counselling
- Work rights/Fair work
- Tenancy/accommodation and housing

- Transport
- Safety and Security
- Telecommunications (telephone/internet), pre-paid and contracts
- Visa and migration referral
- Health insurance
- Education providers
- Travel