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?	The ESOS framework regulates the activity of CRICOS registered providers in relation to students on student visa onshore and as such has no relationship with online and offshore delivery of education. By online we assume that the discussion paper is referring to online study by students who are offshore and who do not hold student visas.
	For this reason, there do not appear to be any barriers in the current ESOS framework to the expansion and diversification into online and offshore delivery.
	The barriers that exist for the non-government school sector in expansion into online and offshore delivery are generally more to do with issues of investment and the licensing of curricula.
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?	In the non-government school sector, overseas students are predominantly under 18 years old. By far the preferred approach for students in this age group is in-person instruction. Unlike other sectors which often teach students by course, schools embed English language acquisition and Australian cultural experiences in the school culture and across the school curriculum.
	Independent schools and their overseas students value the experience of learning which comes from being physically immersed in the context and culture of the school. Feedback from the non-government school sector has been that schools are very much focused on the provision of in-person education now that students are able to return to Australia.
	During the pandemic, schools made significant efforts to ensure that enrolled students, onshore and offshore, continued to receive quality education and care. And while many schools moved to online provision for enrolled students who were offshore, this was challenging for schools, particularly in relation to year 11 and 12 students undertaking their senior secondary certificates who naturally required significant support. Providing dual modes of delivery is also burdensome for non-government schools

	The key factor in the success of the ongoing provision of education during the pandemic was the regulatory flexibility that was shown by all the CRICOS regulators. Added flexibility and responsiveness to industry needs and concerns was extremely helpful to the ongoing capability of all providers to continue to provide education both on and offshore and it demonstrates that additional flexibility can be built 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)?	As noted above, the non-government school sector is not seeking changes to the ESOS framework in relation to the proportion of allowable online delivery for students with student visas onshore. It is the preference of the non-government school sector to deliver schools courses in-person.

4. What safeguards could be used to increase visibility and assure the quality of courses delivered online and

5. How could providers support international students to identify and undertake courses that align with

	One alternative could be for there to be published benchmarks around what is a "fair" commission for the information of providers and students, rather than asking the agents to disclose their fees. This could also drive change in remuneration rates.

10.

13. What is the potential impact on providers regarding increased administrative activity if they are required to monitor all agents?	As noted above, for the non-government sector, increased administrative activities to monitor all agents, including those engaged by families, would be burdensome and could also potentially lead to decreased enrolments.

Course transfers

14. How can the ESOS framework enhance optimal student choice and safeguard the ability of providers to deliver a quality education experience?	It is important that the ESOS framework continue to acknowledge both the rights of students to change courses and the significant investment that providers make in recruiting students.

It is also important to note that the school sector generally deals with students under the age of 18, who are not adults and can be influenced for example by onshore agents, to make educational decisions that may not be in their best interest.

Despite what is noted in the Discussion Paper, there is an T/1 110o1 0 0 1 619.172.48 471.7

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26. What additional guidance do providers need to ensure incoming students meet English language requirements?	Providers could engage in other activities to gauge individual students' English language proficiency in addition to English language testing, such as interviews. However, for large providers this could create significant additional administrative burden.
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?	Not applicable to non-government schools.
General Questions	
28. How can the ESOS framework be strengthened and improved to deliver an optimal student experience?	The last two years of the COVID-19 pandemic have been a very difficult time for providers and students alike. All sectors of education are extremely aware of the mental health impacts that the pandemic has had on students. Student wellbeing is a key concern for non-government schools, for both domestic and international students. The promotion of intercultural training and an increased awareness of the resources available for students, are all important considerations for providers.

Where schools are increasingly supporting students with mental health issues, and also behavioural issues, schools have noted that more advice is needed regarding interpreting obligations under the National Code. Previously there were a series of FAQs available regarding the National Code which were helpful to schools. |
| 29. How can the framework resolve any regulatory barriers that prevent sector innovation, diversification, and growth of Australian education offerings, including online and offshore? | As noted above, it is not clear what role the ESOS framework can play in growing offshore and online education offerings. |
| 30. How can the ESOS regulatory framework evolve to better support the sector to deliver a high-quality education experience? | The non-government school sector is diverse by nature and increasing prescription in the framework might result in the inability of the sector's educational offerings to maintain this diversity The broad range of schools, school environments and school cultures is often a key factor for many overseas school students who choose the non- |

	framework which enables more participation, not less.
Any additional comments you wish to make?	The non-government school sector is concerned that any