

Submission: Redesigning VET FEE-HELP

June 2016

About Navitas

Navitas Ltd is an Australian global education leader providing pre-university and university programs, English language courses, migrant education and settlement services, creative media education, student recruitment, professional development and corporate training services to more than 80,000 learners across a network of over 120 colleges and campuses in 31 countries. Navitas listed on the Australian Securities Exchange (ASX) in 2004 and is now an S&P/ASX 100 company, employing more than 6,000 staff globally.

Navitas believes an innovative, diverse, globally connected public and private tertiary sector is critical to Australia's future prosperity, intellectual capital and social cohesion.

Navitas welcomes this opportunity to provide comment on the *Redesigning VET FEE-HELP Discussion Paper*. We have drawn on the experiences of Navitas' Registered Training Organisations – SAE Creative Media Institute, Australian College of Applied Psychology and Health Skills Australia – as well as Navitas' broad experience in delivering high quality tertiary education for over two decades.

Summary

In providing this response, Navitas would like to state its overarching position relating to VET FEE-HELP. In short, we believe any future VET FEE-HELP policy settings should:

- Not restrict access for learners, instead policy and programs should give them access to rich, accurate, relevant and easily comparable information so they are empowered to make an informed choice; and
- Manage the ongoing sustainability and quality issues of the scheme, not through restrictions, caps or setting priorities, but through setting the barrier to entry appropriately high and then monitoring providers through best practice risk-based case management.

Protecting learners

Learner eligibility to access a loan

This section of the Redesigning VET FEE-HELP Discussion Paper ('the paper') posed two questions.

The first question related to further learner eligibility requirements. Navitas' view is that no further eligibility requirements should be imposed on learners wishing to access the VET FEE-HELP scheme as the purpose of an income contingent loan is to provide for access to education and training for all learners regardless of their financial situation. Imposing additional eligibility requirements on learners will only lead to more people facing upfront fees in order to undertake vocational education and training, which is not a desirable outcome.

The second question related to reducing the administrative complexities involved in taking a Language, Literacy and Numeracy (LLN) assessment while retaining the standard regarding learner preparedness.

In response, Navitas believes that it has not been learner behaviour that has driven the need for changes to the VET FEE-HELP scheme, but rather the unscrupulous behaviour of a small number of providers. Ensuring that a prospective learner has the capability to complete their desired program is a key concern of quality education providers such as Navitas.

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Therefore, the best way to ensure only learners that are capable of completing programs are admitted to the VET FEE-HELP scheme is by ensuring:

- only Registered Training Organisations (RTOs) with the highest standards are given access to the scheme;
- the scheme is administered with highest standards of case management and a coordinated (across the various agencies) risk-based approach; and
- learners are supported to make informed decisions.

These points are dealt with in greater detail later in this submission.

To this end, Navitas believes the simplest way to ensure learner preparedness for a given program is to align the eligibility requirement for VET FEE-HELP with the course / qualification entry criteria identified in the relevant training package. That way providers are able to apply appropriate, relevant and consistent requirements for both course entry and eligibility for VET FEE-HELP.

The requirement for learners to provide a Year 12 Certificate or undertake a LLN assessment that is not fit-for-purpose (CSPA) is inconsistent with the authority given to providers via their accreditation as an RTO. The following examples demonstrate how mandated LLN capability tests that do not relate to the course / qualification entry criteria articulated in the relevant training package, are deterring or disqualifying otherwise capable learners:

- Navitas can identify cohorts of learners who are seeking VET FEE-HELP access for a VET Diploma course where the relevant training package does not stipulate numeracy skills as an entry requirement. Some of these learners have previous higher education qualifications but are unable to provide their Australian Senior Secondary Certificate of Education. Therefore, they have been required to sit the mandated LLN assessment and, despite being able to demonstrate strong English language and literacy skills that exceed the course entry requirements, have failed to reach the required numeracy level and are thereby denied access to the VET FEE-HELP scheme.
- At SAE Creative Media Institute, the changes to the learner entry procedure have restricted course entry for a number of learners with non-standard academic histories who would have normally passed the Institute's alternative entry process. This process is based on a holistic view of an applicant's documented academic history, motivation, creative background and literacy/numeracy skills. The ability of these prospective learners to access a course is now determined by the results of a standard LLN test that is not fit-for-purpose, does not accurately predict a learner's likely future success in their field and does not consider other alternative entry criteria.

Navitas believes that rather than discouraging these learners by imposing inflexible, standard literacy and numeracy requirements, the Commonwealth Government should be encouraging them to develop their skills and employability through vocational training. Empowering RTOs to align VET FEE-HELP eligibility with course entry requirements specified in the relevant training package is the best way to remove unnecessary confusion and complexity, while still ensuring learners are admitted to programs they are capable of successfully completing.

Lifetime loan limit for learners

This section of the paper deals with the operation of the lifetime loan limit for tertiary learners who access FEE-HELP loans to pay tuition fees for either higher education or vocational education and

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training or study in both sectors. Currently most learners can access loans of up to \$99,389 which includes a loan fee.

The paper asks respondents to consider a separate and lower lifetime loan limit for VET FEE-HELP. Navitas' view is that, as the paper itself implies, Australians now and in the future will need more training, retraining and upskilling during the course of their careers, not less. This being the case, Navitas supports the maintenance of the current arrangements.

Navitas again notes that rather than implementing measures that limit a learner's ability to access affordable education and training, we should protect learners by focusing on:

- Maintaining robust eligibility requirements for access VET FEE-HELP funding;
- Improving the monitoring and evaluation of eligible RTOs; and
- Providing timely, accurate and easy accessible information.

All learners need access to an income contingent loan that is set at a reasonable level to account for a working life in which they are likely to change careers up to seven times, and in which the jobs of the future will increasingly be knowledge-based and require higher order skills.

Course costs and maximum loan amounts

In responding to the set of issues identified this section, Navitas makes the following points.

Informing prospective learners

An informed market is by far the most effective and efficient way to ensure learners receive a quality learning experience and outcomes for a reasonable price. The data and information on the MySkills website (<http://www.myskills.gov.au/>) is an excellent basis on which to enhance learner decision making on the return on investment and the quality of the training on offer.

Currently MySkills includes the price of the qualification as offered by provider as well as the average price for each course. It also includes the following aggregated data at the course level (e.g. Certificate III in Electrotechnology Electrician):

- Satisfaction with the training;
- Received job-related benefits;
- Employment outcomes;
- Average salary;
- The top occupations for graduates of that course;
- Destination after training of all graduates;
- Destination after training of those employed after training;
- Employment status after training of those employed before training; and
- Employment status after training of those not employed before training.

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If this same data set was disaggregated down to the level of course by provider – e.g. what is the average salary of the graduates of this course from this provider – it would be a powerful information tool for informing prospective learners.

Navitas believes that it is also important to provide prospective learners with a clear breakdown of the fees associated with particular courses. The MySkills website should include the details on the 'true cost' of the course, this should include an explicit breakdown of:

- The amount and proportion of the course fee that is paid via a public subsidy (e.g. state government subsidies to TAFE courses);
- The amount and proportion of the course fee the learner must pay, broken down by:
 - The amount payable as an upfront fee (if applicable, i.e. any fee not covered by VFH);
 - The amount payable via deferred VET FEE-HELP loan available (if applicable); and
 - The amount of any loan fee associated with the VET FEE-HELP loan.

Additional information regarding the quality of the training experience should also be included on the training provider by course tab. This may include:

- The unit of competency completion rate as well as the qualification completion rate as indicators of positive learner outcomes;
- Course structure (e.g. unit-by-unit delivery or clustered units; face-to-face, online or blended delivery; holistic assessment, work-based assessment, and/or in-class assessment, etc.);
- Course content, including mandatory subjects and electives at this provider;
- Requirements that may impact upon a learner's prospects of participation and progression, such as supervised field practice and attendance requirements;
- Core content or extension work delivered online in the course;
- Recognition of the course by industry regulators and bodies;
- The learning and teaching approach adopted in course by the provider, e.g.:
 - learner to teacher / support staff ratio;
 - approach to training, links between class-room learning and on-the-job training;
 - types of classroom and workplace assessments are required in the course;
 - workload expectations of the training; and
 - learning support provided in the course or by the provider more broadly.
- Quality of the learning and teaching facilities (e.g. are they modern and industry relevant); and
- Industry relevance of the course, and the industry linkages the institution has to provide opportunities for internships and other genuine workplace experiences.

Providing information to prospective learners about relative price differences, the training experience and graduate outcomes is the best way to ensure the cost of training remains

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competitive, while allowing learners to choose to pay a premium where the learner experience and graduate outcomes are demonstrably enhanced.

Restricting VET FEE-HELP to specific courses

Navitas believes that learners (the market) are much better at responding to changes in labour market supply and demand than governments can ever be. Targeting VET FEE-HELP to specific courses risks making our training system far less responsive to the needs of industry, given that much of the data used by government is based on past trends, not future-oriented need. Even surveys or environmental scans that seek to test future skills needs are prone to deficiencies, such as uneven response rates across and within industry sectors. Navitas strongly believes that learners are best placed to make decisions about the course most likely to lead to positive employment outcomes when information about training options and the trends in employment opportunities for particular occupations and jobs within industries is readily available.

Setting national prices or loan values

The paper acknowledges the difficulty in setting prices '[it] requires a high level of government intervention in the market and assumes the Commonwealth has the capacity and capability to determine fees'. Indeed, the paper notes in regard to setting maximum loan amounts that 'substantial resources, effort and analysis is required to make such assessments'.

Navitas agrees with these views. Additionally, we believe that setting national prices for courses may diminish the quality of education and training delivered in Australia's VET system and reduce access for learner cohorts that require additional investment (e.g. lower academic ability; lower socio-economic status; located in regional and remote locations; and seeking niche offerings).

Set prices or mandated maximum loan values for particular courses would not adequately reflect the true cost of delivering high quality training. It may also lead to the following unintended consequences:

- Providers may focus service delivery on the more profitable cohorts, leading to a limited choice of providers for learners across geographic locations, learners populations and modes of delivery;
- Providers may necessarily have to reduce the level of investment in the development of new courses in response to industry needs; and the development/maintenance of current courses in response to changes to the training packages; and
- There may be reduced investment in teacher quality and professional development; learner support services; and capital investment in training, as well as facilities and equipment – particularly for high-cost courses.

By way of example, a provider's fees may be higher because it chooses to pay its teachers at a higher rate than another provider. Better paid teachers is likely to be reflected in a higher quality educational experience for the learner and better graduate outcomes. Likewise, a provider may be offering learner services such as learning support or disability services, with the cost of these services factored into their tuition fees. Price setting by governments based on what is determined to be 'reasonable costs' is unlikely to be able to accurately account for these 'quality variables' and lead to reduced innovation, competition and choice for learners.

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Finally, setting prices for courses / qualifications inadvertently sets a value on the skills attained in a qualification or the occupations linked to that qualification. This not only serves to reinforce established biases of the relative 'value' of one occupation over another, but also does not account for the fact that trends in the employment market and the relative value of particular skills are in constant flux due to changes in supply and demand.

Delivery mode

This section of the paper is based on the premise that 'online courses are typically less expensive to deliver than face to face courses'. The reference that is cited to support this statement is a compilation of research essays copyrighted to the Australian National Training Authority (ANTA) in 2003 (see link here). Much has changed in the delivery of technology-enabled education and the investments in pedagogy that have been made alongside this to support online learning in the nearly decade and a half since this report was written.

Navitas would therefore argue that the assumption that 'online courses are cheaper' is unfounded, and would posit that the costs associated with delivering a truly high-quality, high-value online offering is at least as expensive as face-to-face instruction, particularly given the investment required to develop and maintain such programs.

In an interview from last year, Craig Weidemann, Vice President for Outreach and Vice Provost for Online Education at Pennsylvania State University, describes his institution's experience with pricing online courses. He notes that there are costs that are common across both face-to-face and online delivery and that people costs are the same, if not more, given:

- teachers are still required to lead courses for online learner cohorts;
- teachers are still required to review and sign-off on assessments;
- teachers of both modes are paid the same; and
- online teachers often work alongside other staff, such as instructional designers which adds to the cost of provision.

In terms of development, online courses are often more expensive to develop because in order to deliver quality online learner experience and outcomes institutions have to make:

- significant upfront and ongoing investments in new educational technologies;
- investments in embedded tutoring, security, test proctoring, coaching services, CRM software, 24/7 services, instructional design, and analytics.

Indeed, Navitas' own experience confirms this view. We believe that the delivery of innovative and engaging online learning can be as expensive as on campus and /or blended delivery. It is for these reasons that Navitas believes that the mode of delivery should not be a factor in determining whether particular programs are eligible for VET FEE-HELP. However, that said we note below in the Regulating Provider section that completions by mode of delivery may be a factor that case managers may wish to monitor.

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Improved information for consumers and the role of brokers and agents

Navitas strongly supports the provision of relevant, timely and easily comparable information for prospective learners. See the Informing prospective learners section above for our suggestions on data and information that should be available to learners to help inform their decision making. This should be seen as a minimum benchmark of information with providers wishing to offer additional or contextualised information allowed to do so.

Navitas believes there is a role for brokers, marketing agents or other advisers within the vocational education and training system. As this section of the paper notes 'when used appropriately, brokers and marketing agents can provide an effective response to information asymmetry'. However, Navitas strongly supports implementing appropriate measures to ensure learners are protected from predatory, misleading and otherwise unconscionable behaviour.

Navitas suggests that lessons can be drawn from the regulation of education agents by the Education Services for Overseas Students (ESOS) Act. This legislation holds CRICOS registered providers accountable for the actions of their brokers/agents. On that basis, Navitas recommends the Act and associated National Code be reviewed as an analogous mechanism for regulating agents acting on behalf of VET FEE-HELP eligible RTOs.

While, departmental officials would be best placed to undertake this review and recommend appropriate measures, Navitas recommends that VET FEE-HELP eligible RTOs meet the following requirements:

- Articulate written agreements with each agent engaged to formally represent it. The agreement should include:
 - processes for monitoring the activities of the education agent, including where corrective action may be required. Monitoring activities could include one or more of the following:
 - regular face-to-face meetings with agents;
 - telephone/teleconference meetings;
 - regular reports from agents;
 - surveys of learners recruited by particular agents;
 - surveys of parents of the learners recruited by particular agents;
 - performance benchmarks included in agreements;
 - spot checks by providers, for example, to observe agents at work at education fairs; or
 - surveys of agents.
 - termination conditions, including providing for termination in the circumstances where the provider becomes aware or reasonably suspects the agent has engaged in or previously engaged in dishonest practices or acted negligently, carelessly or incompetently or been engaged in false, misleading or unethical advertising and recruitment practices.
- Ensure agents have up-to-date and accurate marketing information on their courses and institution; and

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- Maintain and publish a list of all agents (may also consider having a link to this list on MySkills website).

Details of how this could be best applied in practice could form part of the follow-up consultations around reforms to VET FEE-HELP. Consideration should be given to supporting providers in reporting non-compliant agents, (e.g. by publishing of a list of non-complying agents that is publicly available online). Consideration would also need to be given to ramifications for providers whose agents are found to have acted inappropriately and who did not take the required measures against the agent, and /or support any affected learners.

VET FEE-HELP ombudsman

Navitas does not support the establishment of a VET FEE-HELP Ombudsman. We believe there are sufficient safeguards embedded in the:

- Higher Education Support Act requirement to implement a grievance procedure (clause 19-45), including the requirement for third party arbitration when complaints cannot be resolved internally; and
- 2015 RTO Standards requirement for a transparent complaints and appeals process including review by an appropriate, independent third party (clause 6.3 (e)).

These safeguards are the responsibility of the provider to implement.

To better protect learners, we support investing time and resources in setting barriers to entry for VET FEE-HELP providers, improving case management and monitoring of VET FEE-HELP providers and ensuring that learners have timely, easy access to accurate information about providers, including complaints procedures.

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Regulating providers

In response to the issues raised in this section of the paper Navitas makes the following points.

Provider loan caps

Navitas supports the commentary in the paper regarding the potential for provider loan caps to dull competition and the suggestion that they do not lead to improved learner experiences and outcomes. We further believe that imposing loan caps deters quality providers from investing in new and existing programs to make them more innovative and industry-relevant. Hence, Navitas does not support the maintenance of a cap on provider loan values.

Again, as noted in the paper, Navitas believes that there are other mechanisms for managing unsustainable growth and associated quality issues. We think the best way to ensure the fiscal sustainability of the VET FEE-HELP scheme, and to ensure it meets the needs of learners and Australian industry is to ensure the following:

- Ensure only suitable providers have access, which has largely been achieved through the additional eligibility requirements implemented in December 2015.
 - The number of providers seeking access to the scheme, beyond the current 271 is also limited to those offering VET diplomas and advance diplomas and being able to meet the eligibility requirements, which means growth in the number of potential providers is likely to be sustainable.
- Monitor the scheme with best practice risk-based approach to case management (see below for details).

Access to the scheme and ongoing monitoring of providers

Access to the scheme

Providers that are currently approved to offer VET FEE-HELP, and do not have any pending investigations or action, should automatically be granted 'approved' status for the new VET FEE-HELP scheme.

For new entrants to the scheme, and continuing providers, Navitas supports most of the current eligibility requirements, including:

- Minimum five year trading history;
- The provision of audited general purpose financial statements; and
- Minimum available cash and cash equivalent asset levels.

The government may also consider including a requirement for the provider to have had unqualified audit outcomes for the previous five years as a barrier to entry as well as a key measure for maintaining eligibility.

Navitas, however, does not support the requirement to have at least 20 percent of total revenue through non-HELP sources when applied at the individual RTO level. As Navitas has previously recommended to Minister Ryan (letter dated 24 March 2016), in order to avoid detrimental outcomes for quality providers and their learners, the application of the 80:20 rule should be at the

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corporation level. That is, where a company like Navitas has multiple entities, which are all cross-guaranteed by the parent organisation, the 80:20 split in revenue sources would be applied at the top level, not at the level of the individual RTOs. In our own case, Navitas' reliance on HELP revenue is 23 per cent of total Australian revenue.

If this requirement continues to be applied at the RTO level Navitas will be forced into costly, artificial and administratively burdensome changes to its entity structures. The re-structures serve no strategic, commercial or learner-protection purpose; they will be done to ensure compliance with legislation where Navitas is already meeting the intent of the legislation. In addition, our resources will be diverted from improving learning and teaching in high growth industries such as health, applied health and creative media.

In implementing this measure at the corporation level, the government may require that the revenue split of existing corporations (with multiple VET FEE-HELP eligible entities) are assessed at the date on which the Higher Education Support Amendment (VET FEE-HELP Reform) Bill 2015 came into effect. This would prevent existing corporations wishing to circumvent the legislation by, for example, acquiring new businesses with low or no reliance on HELP funding.

Ongoing monitoring of providers

Navitas believes the most effective and efficient way to manage VET FEE-HELP providers is through best practice risk-based case management. Case managers within the department would be responsible for monitoring providers within the scheme.

Some of the possible monitoring mechanisms / criteria could include the following:

- ASQA sharing all documentation relating to individual providers with case managers in the Department (if this does not already occur);
- The Department making key data and documentation available to ASQA, including, but not limited to: providers annual estimates of VET FEE-HELP loans; any adjustments to estimates; and data on actual monthly and annual payments to providers (if this does not already occur);
- Providers supplying a copy of their business plan, which could include: key enrolment growth estimates; new program offerings; investments in existing programs; and marketing priorities;
- Providers supplying a list of brokers / agents that the provider has agreements in place with (should the recommendation above regarding the ESOS model be adopted);
- Monitoring of:
 - Enrolment growth, by course / qualification, and at the provider level;
 - Loan payments, by month and annually and how closely actuals align with loan estimates (this is the Department's own data so would not be required to be provided by RTOs);
 - Course completion rates at course / qualification level, by mode of delivery;
 - Average course completion rates at the provider level, by mode of delivery;
 - Unit completion rates at unit level, by mode of delivery;

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- Average unit completion rates at the provider level, by mode of delivery;
- Monitoring of progression rates with measurement linked to a Unique Student Identifier (USI) to track whether a learner is actively enrolled in a program of study past the program’s census date.
 - USIs provides a useful method for tracking learner progression within the sector as a whole, not just by a particular provider or within a specific course of study.
 - Recognition of Prior Learning (RPL) should also be considered and factored in to this tracking as it is currently possible for a learner to be identified as not progressing, even though they have completed their studies legitimately through RPL.
- Graduate employment outcomes, at the course level, by mode of delivery (with consideration for outcomes such as self-employment, entrepreneurship and further study); and
- Average employment outcomes at the provider level, by mode of delivery (with same considerations as mentioned above).

Navitas stresses however, that effective case management should not put additional administrative burden on providers. To this end, government agencies and regulators should align accreditation, auditing and other administrative activities and only seek required information once from providers – not multiple times in different formats for different purposes. Obviously the proposed information sourced from providers would be treated as commercial-in-confidence by government agencies and regulators, and therefore treated with the requisite level of sensitivity.

Navitas advocates for an approach that takes all of these factors in combination into account when monitoring providers, and not for mandating specific minimum completion rates or the like.

Monitoring of providers should be done holistically, for example:

- A sharp increase in enrolments may in isolation be a red flag in terms of risk, however when this increase is considered in the context of an investment in a new program or expansion of an existing program – outlined in a provider’s business plan – it is identified as a positive development.
- Likewise, a lower than average course completion rate may not be as concerning when unit completion rates and graduate employment outcomes remain at a reasonable level compared to sector averages. Taking a risk-based approach and assessing the whole picture of a provider to ensure quality providers are able to expand their offerings is a good thing for learners and our economy.
- Further, case managers may do ‘spot checks’ on broker websites and other marketing material to ensure they are providing accurate information about VET FEE-HELP, consistent with information being offered to prospective learners by providers.

The approach of assigning a case manager to a set of providers also allows for relationships to be built between providers and case managers and for case managers to develop an understanding and awareness of each of the providers on their case load. This approach provides for the opportunity for concerns to be addressed early and for effective management of the scheme.

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A risk-based ongoing monitoring framework allows for case managers to raise potential issues early with providers, issue show cause notices and then, should it be required, to elevate issues to regulatory agencies etc.

Navitas believes that the investment required to build new or link existing data sets (for both learner choice and provider monitoring) as well as the resources required to develop a dedicated case management capability in the Department is modest relative to the return on that investment.

Time limits for access to VET FEE-HELP

Navitas believes that access to VET FEE-HELP should not be time limited, but rather it should be aligned with an RTO's period of registration. Indeed, should the above recommended case management model be adopted a provider's performance relevant to VET FEE-HELP would be monitored continuously.

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Managing the system

In response to the issues raised in this section of the paper Navitas makes the following points.

Course eligibility and course caps

For the purposes of the following comments, Navitas has interpreted 'all VET courses' to be all VET Diploma and Advanced Diploma courses – across all fields of study. We have not included courses in qualifications at or below Certificate IV.

To this end, Navitas believes that all VET courses should be eligible for VET FEE-HELP. Also, there should not be any caps imposed in terms of courses learners can enrol in, places in particular courses or places individual providers may offer. Our view aligns with the view expressed in the paper, which is that predicting emerging trends in employment and skills needs at a national level is extremely difficult and that there are 'many examples of central allocation [that resulted] in less than ideal outcomes'. Any attempts to cap, prioritise or otherwise manipulate the market will often lead to distortion and unintended consequences. Navitas believes the learners (the market) are much better than government at responding to supply and demand signals in terms of the skills required in communities and the economy.

Further, Navitas believes that capping the number of places that providers may offer discourages investment in developing new programs and enhancing existing programs that meet industry needs, and would severely limit learner choice, particularly in niche disciplines outside of major metropolitan areas.

Information on performance

Navitas fully supports the provision of data by providers to support learner choice and monitoring by case managers. Our response under the Informing Learning Choice and Ongoing Monitoring of Providers headings outlines our key suggestions in this regard.

Additionally, Navitas would like to note a limitation of the accuracy of current data as it relates to completions. This relates to the period over which course completion data is collected, particularly for part-time learners. For example, if a learner enrolls in a course in Year 1 and studies part-time over three years, AVETMISS data will record them as not complete in Year 1 and not complete in Year 2. The completion data for Year 3 is not captured and so the fact that they completed the qualification in Year 3 will not be captured. We recommend extending the collection period (cross-referenced to USIs) to at least three years and preferably to five years. There could also be additional fields made available to report on outcomes for the number of learners who do not complete the full qualification – for example numbers continuing study, numbers withdrawn early to commence work, or due to family commitments, etc.

In terms of regularity of the provision of this data, the current HEIMS data reporting requirement whereby data is submitted after every census date (three times a year) seems sufficient from a monitoring perspective and not overly burdensome for providers.

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Tuition Assurance

Navitas recommends that the Commonwealth Government consider implementing tuition assurance arrangements for VET FEE-HELP that are modelled on the Tuition Protection Service. The Tuition Protection Service (TPS) is an initiative of the Commonwealth Government to assist international students whose education providers are unable to fully deliver their course of study. The TPS ensures that international students are able to either:

- complete their studies in another course or with another education provider; or
- receive a refund of their unspent tuition fees.

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