

## Submission on proposed changes to the National Code of Practice for Providers of Education and Training to Overseas Students 2007

### Overview

PROPOSED AMENDMENTS	SUPPORT / DO NOT SUPPORT	COMMENTS <i>Please provide a comment if you do not support a proposed amendment, and suggest alternative wording if appropriate.</i>
<ul style="list-style-type: none"><li>• Parts A, B and C of the 2007 National Code have been streamlined to:<ul style="list-style-type: none"><li>○ provide an overview of the ESOS framework</li><li>○ summarise the role of the National Code and its purpose</li><li>○ outline the quality assurance arrangements and roles of other relevant Commonwealth agencies</li></ul></li></ul>	Support	
<ul style="list-style-type: none"><li>• Some part C and D requirements in the 2007 National Code have been moved to Standard 11 as requirements for providers.</li><li>• The standards are now in part B.</li></ul>	Support	

## Standard 1 – Marketing information and practices

PROPOSED AMENDMENTS	SUPPORT / DO NOT SUPPORT	COMMENTS <i>Please provide a comment if you do not support a proposed amendment, and suggest alternative wording if appropriate.</i>
<ul style="list-style-type: none"> <li>Clarifies that providers must not engage in false or misleading marketing practices, consistent with Australian Consumer Law.</li> </ul>	Support	
<ul style="list-style-type: none"> <li>Marketing material must accurately identify the provider's association with any other providers, work-based or work-integrated learning opportunities, and prerequisites including English language.</li> </ul>	See note – Do not support 1.3.2 in its entirety	1.3.2 refers to the requirement for any provider entering into agreements with overseas students to accurately identify any work integrated or work based learning , either required or optional as part of the course. The explicit requirement for identifying 'optional' work based components renders the scope to be too unwieldy for providers to manage. Recommend eliminating 'or optional' from current wording.
<ul style="list-style-type: none"> <li>Specific provisions prevent a provider from undertaking to or guaranteeing that it can secure a migration or successful education assessment outcome.</li> </ul>	Support	

## Standard 2 – Enrolment of an overseas student

PROPOSED AMENDMENTS	SUPPORT / DO NOT SUPPORT	COMMENTS <i>Please provide a comment if you do not support a proposed amendment, and suggest alternative wording if appropriate.</i>
<ul style="list-style-type: none"> <li>Clarifies that a provider must inform a student before they enrol about: course content, modes of study (including online and/or work related learning placements) and assessment requirements.</li> </ul>	See note – do not support full extent of 2.1.2	It would be unreasonable for providers to include assessment requirements & work related learning placements for each and every subject/unit within a program of study before the point of enrolment.

PROPOSED AMENDMENTS	SUPPORT / DO NOT SUPPORT	COMMENTS <i>Please provide a comment if you do not support a proposed amendment, and suggest alternative wording if appropriate.</i>
<ul style="list-style-type: none"> <li>Requires providers to give information about the policy and process for approving welfare and accommodation arrangements for students under 18 where relevant.</li> </ul>	Support	Arrangements extend the scope of a provider's duties but requirements don't deviate substantially from current practice. An expansion of this requirement indicate that providers will be expected to invest additional resources.
<ul style="list-style-type: none"> <li>Requires registered providers to have and implement a documented policy and process for assessing English language proficiency, educational qualifications and work experience are sufficient to undertake the course.</li> </ul>	Support	
<ul style="list-style-type: none"> <li>Incorporates the requirements relating to course credit, previously in standard 12.</li> <li>Adds that course credit or recognition of prior learning (RPL) must preserve the integrity of the award to which it applies.</li> </ul>	Support with changes to 2.4	<p>Recommend deleting reference to students needing to 'sign' course credit arrangements. Electronic acceptance methods account for signatures. Suggest replacing the word 'sign' with 'accept'.</p> <p>As files may be stored in various forms/methods, we suggest the provider obligation to retain on the student's 'record' rather than 'file'.</p>

### Standard 3 – Formalisation of enrolment and written agreements

PROPOSED AMENDMENTS	SUPPORT / DO NOT SUPPORT	COMMENTS <i>Please provide a comment if you do not support a proposed amendment, and suggest alternative wording if appropriate.</i>
Written agreements must include more detailed information about students' enrolment.	Do not support 3.3.1.	3.3.1 - The expansion of requirements to include information about modes of study, compulsory on-line and/or work related learning placements & other community based learning and collaborative research training makes for a vast increase in information and an onerous obligation for providers. Written agreements to students are already very lengthy. It would be more reasonable to include links to same information and references to website information.

<b>PROPOSED AMENDMENTS</b>	<b>SUPPORT / DO NOT SUPPORT</b>	<b>COMMENTS</b> <i>Please provide a comment if you do not support a proposed amendment, and suggest alternative wording if appropriate.</i>
Providers must require students must keep their personal and contact information up to date.	Support	
<ul style="list-style-type: none"> <li>The provider must retain records of the written agreement and receipts of payments by the student for at least 2 years after the person ceases to be an accepted student.</li> </ul>	Support	

## Standard 4 – Education agents

PROPOSED AMENDMENTS	SUPPORT / DO NOT SUPPORT	COMMENTS <i>Please provide a comment if you do not support a proposed amendment, and suggest alternative wording if appropriate.</i>
<ul style="list-style-type: none"> <li>Clarifies that providers must ensure the agent has up to date and accurate information, does not engage in false or misleading conduct, declares in writing and takes reasonable steps to avoid conflicts of interest, observes appropriate levels of confidentiality and transparency in dealing with students, and acts honestly and in good faith.</li> </ul>	Support but suggest amendment to 4.3	4.3 Requirement for a policy and process to monitor agent activity. Could this be covered in the written agreement with the agent as distinct from a policy? Policy creation and policy management creates an inflexible level of administrative burden particularly when attempting to increase or enhance arrangements with agents. A process management is recommended as a better fit. (The distinction is important).
<ul style="list-style-type: none"> <li>Clarifies the provider must ensure the agent has appropriate knowledge and understanding of the international education system in Australia, including the code of ethics.</li> </ul>	Support but deficiency in 4.4.4	4.4.4 Code of Ethics for agents needs further referencing and/or requirements need to be more clearly defined if this is to be included.

## Standard 5 – Younger students

PROPOSED AMENDMENTS	SUPPORT / DO NOT SUPPORT	COMMENTS <i>Please provide a comment if you do not support a proposed amendment, and suggest alternative wording if appropriate.</i>
<ul style="list-style-type: none"> <li>Providers enrolling students under 18 must meet any Australian, state or territory legislation or other regulatory requirements relating to child welfare and protection.</li> </ul>	Support	
<ul style="list-style-type: none"> <li>Requires providers to give information to students under 18 about who to contact in emergency situations.</li> </ul>	Support	

<p align="center"><b>PROPOSED AMENDMENTS</b></p>	<p align="center"><b>SUPPORT / DO NOT SUPPORT</b></p>	<p align="center"><b>COMMENTS</b> <i>Please provide a comment if you do not support a proposed amendment, and suggest alternative wording if appropriate.</i></p>
<ul style="list-style-type: none"> <li>Requires providers to give information on how a student under 18 can seek assistance and report any incident or allegation involving abuse.</li> </ul>	<p align="center">Support</p>	
<ul style="list-style-type: none"> <li>Providers with responsibility for a student's welfare must check initially and least every six months thereafter that the student's accommodation is appropriate to the student's age and needs.</li> </ul>	<p align="center">Support</p>	
<ul style="list-style-type: none"> <li>Adults involved in or providing accommodation must have any Working with Children clearances (or equivalent) as required in a state or territory.</li> </ul>	<p align="center">Support</p>	
<ul style="list-style-type: none"> <li>Requires a policy and process for managing critical incidents, including in emergency situations and when welfare arrangements are disrupted.</li> </ul>	<p align="center">Support</p>	
<ul style="list-style-type: none"> <li>Where a provider is no longer able to approve welfare arrangements, all reasonable steps must be taken to notify the student's parent or legal guardian immediately.</li> </ul>	<p align="center">Support but note concern over timeframe in 5.3.5.3</p>	<p>A requirement by a provider to notify Immigration within 24 hours of not being able to approve welfare arrangements is not always feasible due to external factors beyond the provider's control. Recommend 48 -72 hours.</p>

PROPOSED AMENDMENTS	SUPPORT / DO NOT SUPPORT	COMMENTS <i>Please provide a comment if you do not support a proposed amendment, and suggest alternative wording if appropriate.</i>
<ul style="list-style-type: none"> <li>Providers must have documented processes for selecting, screening and monitoring any third parties engaged by the provider to organise and assess welfare and accommodation arrangements.</li> </ul>	Support	
<ul style="list-style-type: none"> <li>If a provider enrolls a student under 18 who has welfare arrangements approved by another provider, the receiving provider must negotiate the transfer date for welfare arrangements to ensure there is no gap.</li> </ul>	Support	
<ul style="list-style-type: none"> <li>The provider must advise the student of their visa obligation to maintain their current welfare arrangements until the transfer date or have alternative welfare arrangements approved or return to their home country until the new arrangements take effect.</li> </ul>	Support	

### Standard 6 – Student support services

PROPOSED AMENDMENTS	SUPPORT / DO NOT SUPPORT	COMMENTS <i>Please provide a comment if you do not support a proposed amendment, and suggest alternative wording if appropriate.</i>

PROPOSED AMENDMENTS	SUPPORT / DO NOT SUPPORT	COMMENTS <i>Please provide a comment if you do not support a proposed amendment, and suggest alternative wording if appropriate.</i>
<ul style="list-style-type: none"> <li>Requires providers to give information to students regarding a range of support services, including relating to English language, health, legal services, complaints and appeals avenues, and employment assistance (including resolving workplace issues).</li> </ul>	Support	
<ul style="list-style-type: none"> <li>Requires the provider to facilitate access to learning support services, including for different modes of study such as online or distance.</li> </ul>	Support but require clarification to 6.6	6.6 indicates that a registered provider must have sufficient student support personnel to meet the needs of the students enrolled. How is 'sufficient' measured? Is there a current industry benchmark or student:staff ratio deemed to be appropriate? What can providers rely on to ensure compliance?
<ul style="list-style-type: none"> <li>Clarifies that providers must have in place a documented policy and process to manage critical incidents that could affect a student undertaking or completing the course. (Note: standard 5 requires a critical incident policy and process more specific to the needs of students under 18.)</li> </ul>	Support	
<ul style="list-style-type: none"> <li>Providers must take all reasonable steps to provide a safe environment on campus and give overseas students information about how to seek assistance for and report an incident that significantly impacts on their wellbeing.</li> </ul>	Support	

### Standard 7 – Student transfers

PROPOSED AMENDMENTS	SUPPORT / DO NOT SUPPORT	COMMENTS <i>Please provide a comment if you do not support a proposed amendment, and suggest alternative wording if appropriate.</i>



PROPOSED AMENDMENTS	SUPPORT / DO NOT SUPPORT	COMMENTS <i>Please provide a comment if you do not support a proposed amendment, and suggest alternative wording if appropriate.</i>
<ul style="list-style-type: none"> <li>Providers must not knowingly enrol a student wishing to transfer from another provider's course prior to the student completing six months of their principal course, or for the school sector, until after the first six months of the first registered school sector course.</li> </ul>	Support with amendments to 7.1, 7.1.3 & 7.2	<p>7.1 refers to prohibitions on transfer within the first 6 months of study. Reference to 6 months transcends a one semester compulsory study period and may equate to two semesters on a more practical level if students commence in semester one. Inequities occur in duration when compared to students who commence in semester two as the six month period will expire during summer break. – Suggest using the word 'semester' or 'study period' instead of 6 months if this needs to be referenced.</p> <p>7.1.3 It is important that the release process in PRISMS is linked to the provider to which the student has sought a release to. Current arrangements allow for a student to use a release letter to take to any provider, with an explicit prohibition on the naming of the educational provider in a release letter.</p> <p>7.2 The 'best interests' of a student will invariably be any reason that the student identifies as in their favour. This scope is exceptionally broad and prohibits providers from refusing release requests based on unqualified assumptions.</p> <p>More broadly, a 'best interests' approach to granting releases will result in poaching within the industry (the very reason why release limitations were established).</p> <p>Release is inherently tied to a provider's risk index rating with DIBP and ongoing risks are maintained by original providers when students transfer to alternate education providers. To ensure that release requests comply with the spirit of choice and best interests for students, it is recommended that provider risk be eliminated for visa cancellations on shore. In the absence of an alignment with this DIBP strategy, providers will be unfairly exploited, particularly Risk Category 1 providers.</p> <p>7.2.2.1 refers to the requirement to release a student to transfer even after a provider has identified and implemented its intervention strategy consistent with Standard 8. Standard 8</p>

PROPOSED AMENDMENTS	SUPPORT / DO NOT SUPPORT	COMMENTS <i>Please provide a comment if you do not support a proposed amendment, and suggest alternative wording if appropriate.</i>
<ul style="list-style-type: none"> <li>Transfer requests from the student must be in writing.</li> </ul>	Support with comments	The requirement for a request to be made with a 'valid offer' of enrolment from another provider is lacking. It is suggested that students should include a written request inclusive of a valid/unconditional offer from another provider.
<ul style="list-style-type: none"> <li>The provider must have and implement a documented policy and process for assessing student transfer requests, which must outline circumstances in which the provider will grant a transfer because it is in the student's best interests; and reasonable grounds for refusal of the request.</li> </ul>	Do Not Support	There is little scope for education providers to generate disincentives to students who exploit low risk providers for the purpose of obtaining a student visa. – An appropriate trade-off would be an ability for providers to retain a more significant non-refundable administration fee.
<ul style="list-style-type: none"> <li>The standard contains additional guidance for providers about circumstances in which they should grant a transfer because it is in the student's best interests.</li> </ul>	Do not support	<p>There is an expectation that all explanations by students will serve their best interests, and an obvious inherent tension with the provider's risk index.</p> <p>The measure of a student's 'best interests' is broad and without measurement. Consequently, this will allow most students to transfer based on financial motivations at a minimum, for which students have already attested to the Australian government and their provider as having sufficient funds for study in the process of application for admission and for their student visa.</p>

PROPOSED AMENDMENTS	SUPPORT / DO NOT SUPPORT	COMMENTS <i>Please provide a comment if you do not support a proposed amendment, and suggest alternative wording if appropriate.</i>
<ul style="list-style-type: none"> <li>If a student requesting a transfer is under 18, written confirmation of agreement of a parent or legal guardian is required.</li> </ul>	Support	
<ul style="list-style-type: none"> <li>Where a provider agrees to a student's release the date of effect and reason for release must be recorded in PRISMS and the provider must advise the student Immigration to seek advice on whether a new student visa is required.</li> </ul>	Support with comments to 7.4	7.4 Providers require explicit guidance from DIBP in relation to circumstances that will result in a requirement for a new student visa (for example, changes to AQF levels where a transfer is requested post arrival). An over-arching statement provided to students advising them to liaise with DIBP is already given. Any further details regarding the 'need' for a new visa has generally constituted 'migration advice' in the eyes of DIBP.
<ul style="list-style-type: none"> <li>If release is not to be granted, the provider must give to the student the reasons for refusal in writing.</li> </ul>	Support	
<ul style="list-style-type: none"> <li>The provider must maintain records of all requests for transfer, assessment and decision on the student's file for two years after the student ceases to be an accepted student.</li> </ul>	Support	

## Standard 8 – Monitoring course progress and attendance

### Providers must monitor student progress

PROPOSED AMENDMENTS	SUPPORT / DO NOT SUPPORT	COMMENTS <i>Please provide a comment if you do not support a proposed amendment, and suggest alternative wording if appropriate.</i>

<p style="text-align: center;"><b>PROPOSED AMENDMENTS</b></p>	<p style="text-align: center;"><b>SUPPORT / Do NOT SUPPORT</b></p>	<p style="text-align: center;"><b>COMMENTS</b> <i>Please provide a comment if you do not support a proposed amendment, and suggest alternative wording if appropriate.</i></p>
<ul style="list-style-type: none"> <li>• All providers must monitor students' progress, as satisfactory course progress is a student visa requirement. Some sectors require providers to also monitor attendance.</li> </ul>	<p style="text-align: center;">Support</p>	
<ul style="list-style-type: none"> <li>• Providers must clearly outline and inform the student before they commence their course of the requirement to achieve satisfactory course progress in each study period.</li> </ul>	<p style="text-align: center;">Support</p>	
<ul style="list-style-type: none"> <li>• Providers must have documented policies and processes to identify, notify and assist a student at risk of not meeting course progress (or attendance requirements if applicable) where evidence from the student's assessment tasks, participation or other indicators of academic progress indicate the student is at risk of not meeting requirements.</li> </ul>	<p style="text-align: center;">Support</p>	

### Schools, ELICOS and foundation programs

<p style="text-align: center;"><b>PROPOSED AMENDMENTS</b></p>	<p style="text-align: center;"><b>SUPPORT / DO NOT SUPPORT</b></p>	<p style="text-align: center;"><b>COMMENTS</b></p> <p style="text-align: center;"><i>Please provide a comment if you do not support a proposed amendment, and suggest alternative wording if appropriate.</i></p>
<ul style="list-style-type: none"> <li>• School, ELICOS and foundation programmes require both course progress and attendance monitoring. The requirement for attendance is 80% of the scheduled contact hours for the course, or higher if specified under state registration or approval frameworks.</li> </ul>	<p style="text-align: center;">Support</p>	
<ul style="list-style-type: none"> <li>• School, ELICOS and foundation program providers must have a documented policy and process for monitoring and recording students' attendance.</li> </ul>	<p style="text-align: center;">Support</p>	<p>N.B Additional guidance is required where reporting occurs and whether this will necessitate the cancellation of an eCoE or package of eCoE's for the principal course as well.</p>
<ul style="list-style-type: none"> <li>• Higher education providers must have and implement a documented policy and process for monitoring and recording course progress, specifying requirements for achieving satisfactory progress, the provider's processes and policies to uphold academic integrity, assessment of progress, identification of students at risk of not meeting requirements and details of the provider's intervention strategy.</li> </ul>	<p style="text-align: center;">Support</p>	

**VET programs**

<p><b>PROPOSED AMENDMENTS</b></p>	<p><b>SUPPORT / DO NOT SUPPORT</b></p>	<p><b>COMMENTS</b> <i>Please provide a comment if you do not support a proposed amendment, and suggest alternative wording if appropriate.</i></p>
<ul style="list-style-type: none"> <li>• VET providers must have and implement a documented policy and process for assessing course progress, specifying requirements for achieving satisfactory process and policies to uphold academic integrity, assessment of progress, identification of students at risk of not meeting requirements and details of the provider’s intervention strategy.</li> </ul>	<p>N/A</p>	
<ul style="list-style-type: none"> <li>• A VET provider must have and implement a documented policy and process for monitoring students’ attendance if the ESOS agency requires that provider to monitor attendance as well as course progress. This requirement in the National Code replaces previous arrangements split between the National Code and Course Progress Guidelines that applied to VET.</li> <li>• If the ESOS agency imposes attendance monitoring as a requirement for a VET provider, the minimum requirement for attendance is 80% of the scheduled contact hours for the course.</li> <li>• If the VET provider is required to monitor attendance of students, the provider must have an intervention strategy for students at risk of not meeting attendance requirements.</li> </ul>	<p>N/A</p>	

### Course duration and allowable extensions

<p style="text-align: center;"><b>PROPOSED AMENDMENTS</b></p>	<p style="text-align: center;"><b>SUPPORT / DO NOT SUPPORT</b></p>	<p style="text-align: center;"><b>COMMENTS</b> <i>Please provide a comment if you do not support a proposed amendment, and suggest alternative wording if appropriate.</i></p>
<ul style="list-style-type: none"> <li>• Providers must continue to not extend the duration of a student’s enrolment if the student is unable to complete the course within the expected duration, unless:               <ul style="list-style-type: none"> <li>○ compassionate and compelling circumstances apply</li> <li>○ the provider has implemented, or is implementing, an intervention strategy to assist the student to meet course progress (or attendance, if applicable) requirements</li> <li>○ there is an approved deferral or suspension of the student’s enrolment under standard 9.</li> </ul> </li> </ul>	<p style="text-align: center;">Support</p>	
<ul style="list-style-type: none"> <li>• If a student’s enrolment is extended, the provider must advise the student of any potential impacts on their visa.</li> </ul>	<p style="text-align: center;">Support</p>	

## Reporting breaches of visa requirements

<p style="text-align: center;"><b>PROPOSED AMENDMENTS</b></p>	<p style="text-align: center;"><b>SUPPORT / DO NOT SUPPORT</b></p>	<p style="text-align: center;"><b>COMMENTS</b> <i>Please provide a comment if you do not support a proposed amendment, and suggest alternative wording if appropriate.</i></p>
<ul style="list-style-type: none"> <li>• Providers must continue to report students who do not meet course progress ( attendance requirements if applicable) and notify the student:               <ul style="list-style-type: none"> <li>○ that the provider intends to report them</li> <li>○ inform the student of the reasons</li> <li>○ advise the student they can appeal</li> <li>○ report the breach in PRISMS in accordance with s19(2) of the ESOS Act</li> </ul> </li> </ul>	<p style="text-align: center;">Support</p>	
<ul style="list-style-type: none"> <li>• A provider may decide not to report a student for breaching attendance requirements if the student provides genuine evidence of compassionate or compelling circumstances, is still attending at least 70 per cent of course contact hours and appeals the decision successfully</li> </ul>	<p style="text-align: center;">Support</p>	



## Online learning

PROPOSED AMENDMENTS	SUPPORT / DO NOT SUPPORT	COMMENTS <i>Please provide a comment if you do not support a proposed amendment, and suggest alternative wording if appropriate.</i>
<ul style="list-style-type: none"> <li>Online and distance learning are defined in the standard.</li> </ul>	Support with comments	Greater clarity is required with the use of 'regular' classes within the definition. Does this include intensive mode classes?
<ul style="list-style-type: none"> <li>The 2007 National Code requirement that providers must not enrol a student exclusively in distance or online learning in any compulsory study period has been removed.</li> </ul>	Do not support	This will be difficult for most providers to monitor, particularly semesters where all units are undertaken via distance. It may also compromise the ability to provide students with services to assist them in their learning as per requirements in Standard 6.
<ul style="list-style-type: none"> <li>Higher education and VET providers must not deliver more than one-third of a student's course online.</li> </ul>	Do not support	Recommend the retention of 25% distance limits and no exclusive semester for on-line study so as to maintain the student experience. Very difficult to monitor/manage both enrolment changes.
<ul style="list-style-type: none"> <li>Providers must take all reasonable steps to prevent students being disadvantaged by additional costs or requirements associated with online learning or by an inability to access the resources and community of the education institution, or opportunities to engage with other students.</li> </ul>	?	

## Standard 9 – Deferring, suspending or cancelling the student’s enrolment

PROPOSED AMENDMENTS	SUPPORT / DO NOT SUPPORT	COMMENTS <i>Please provide a comment if you do not support a proposed amendment, and suggest alternative wording if appropriate.</i>
<ul style="list-style-type: none"> <li>Standard 9 now relates to deferring, suspending or cancelling the student’s enrolment (previously standard 13). It clarifies the current requirements but makes no significant changes to policy from the 2007 version.</li> </ul>	Support	

## Standard 10 – Complaints and appeals

PROPOSED AMENDMENTS	SUPPORT / DO NOT SUPPORT	COMMENTS <i>Please provide a comment if you do not support a proposed amendment, and suggest alternative wording if appropriate.</i>
<ul style="list-style-type: none"> <li>Assessment of an internal complaint or appeal must be finalised within 20 working days.</li> </ul>	Do not support 10.2.4.  Support 10.2.8 with comments	10.2.4. Makes it very difficult to finalise a complaint within 20 working days. Complaint processes will be compromised with this requirement, particularly very complex complaints. Appeals may be completed within this time frame.  10.2.8 Fails to indicate how long a provider must wait and/or maintain enrolment whilst waiting for an indication as to whether a student will undertake an external appeal process. Needs to be more prescriptive.

## Standard 11 – Additional requirements

PROPOSED AMENDMENTS	SUPPORT / DO NOT SUPPORT	COMMENTS <i>Please provide a comment if you do not support a proposed amendment, and suggest alternative wording if appropriate.</i>

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<ul style="list-style-type: none"> <li>• Standard 11 creates new provisions for additional registration requirements, many of which were previously in Part C of the 2007 version of the National Code relating to 'registration authorities'. Registration authorities are replaced by ESOS agencies by amendments to the ESOS Act passed in December 2015.</li> </ul>	Support	
<ul style="list-style-type: none"> <li>• Providers must seek approval from the ESOS agency, including through the relevant designated State authority if the provider is a school, for proposed: <ul style="list-style-type: none"> <li>○ course content and duration</li> <li>○ number of overseas students enrolled within the limit approved by the ESOS agency</li> <li>○ arrangements with other education providers (partnerships).</li> </ul> </li> <li>• Providers must also seek approval from their ESOS agency for any proposed changes to the above during their period of registration under the ESOS Act.</li> </ul>	Support	
<ul style="list-style-type: none"> <li>• Providers must advise their ESOS agency, including through the relevant designated State authority if the provider is a school, in writing of: <ul style="list-style-type: none"> <li>○ any other affiliated organisations registered on the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS)</li> <li>○ any changes to high managerial agents or ownership of their organisation.</li> </ul> </li> </ul>	Do not support 11.2	<p>The notification of changes to a provider's business activities or operations goes beyond 'owner and location'. There is far more scope for higher education providers to notify any multitude of changes to business activities. This is unreasonable.</p> <p>Suggest excluding Table A providers from this requirement.</p>

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<ul style="list-style-type: none"> <li>Self-accrediting providers must undertake an independent external audit during their period of registration, at least within 18 months prior to renewal of registration, allowing the outcomes to be used for registration renewal.</li> </ul>		

**Other comments**

Please list any other comments here: