



4 November 2010

Committee Secretary
House of Representatives Standing Committee on
Education and Employment
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The University of South Australia (UniSA) welcomes the opportunity to provide comment to the House of Representatives Standing Committee Inquiry into the *Higher Education Legislation Amendment (Student Services and Amenities) Bill 2010*. UniSA notes that the Terms of Reference include any issues raised by the text of the Bill and its Explanatory Memorandum, with an emphasis on implementation issues. UniSA offers the following comments.

Policy Issues

UniSA supports the Government's intention to introduce a fee that facilitates improvements in students' experience of university life. UniSA notes that the proposed fee may be applied to a range of on-campus services, but may not be used to support political parties or the election of persons to political forums.

UniSA considers that the Bill is likely to achieve its policy objectives. The proposed Student Amenities Fee will effectively contribute to the quality and richness of the student experience that UniSA strives to deliver. A globalised future will involve greater connectedness and expanded flows of information, technology, capital, goods, services and people throughout the world. By providing services and activities on-campus, students will benefit through involvement in creativity, networking and relationship-building, and share in a stronger sense of collective purpose.

Although compliance will entail further administrative efforts, UniSA supports the measures achieved by adopting the *Student Services, Amenities, Representation and Advocacy Guidelines*. These Guidelines require institutions to consult students about the uses to which the Student Services and Amenities Fee will be put.

Providers receiving Commonwealth grants post-2012 must comply with the Guidelines, which require student representation in governance matters. No information is yet available about compliance issues including reporting, benchmarks, protocols and monitoring.

Student advocacy on campus has remained a strong tenet of UniSA's commitment to providing a high-quality student experience. Students are currently represented on Academic Council, Academic Board, and the Teaching and Learning Committee (a sub-committee of Academic Board). An independent, impartial Student Ombud is available at the University. An independent organisation, UniLife, provides a forum for students to express opinions and develop leadership skills, offers advice on academic issues, and organises sporting and social events.

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Implementation Issues

There are numerous complexities associated with introducing the Student Services and Amenities Fee. Issues requiring further consideration include the application of the Fee to:

- Students accessing higher education through Open Universities Australia
- Students undertaking Foundation Studies and accessing tertiary education through Colleges and other pathway-programs
- Students undertaking cross-institutional study programs.

The application of the Fee to international students presents complexities for enrolment timeframes. International students are subject to earlier timeframes for confirmation of enrolment, and are required to pay deposits up front for study. The implementation of the Student Services and Amenities Fee to international students commencing in 2011 would impose an additional administrative burden.

The implementation of appropriate technologies (e.g. software capabilities) for revenue collection is a significant sector-wide issue that will require a collaborative effort. Negotiations to develop software cannot commence until the Bill is passed, and costs of software development cannot be quantified until the requirements of the sector are known. It is highly unlikely that software modifications could be made in time to apply the proposed Fee from January 2011. Further, information flows between corporate finance, student enrolment and reporting systems, and external reporting systems, will depend on the availability of appropriate system capabilities. Therefore, all Fees, refunds and data scrutiny would initially be undertaken using manual processes. This creates a significant administrative and cost burden.

Dates for Commonwealth reporting requirements have not yet been promulgated. Compliance with these will also require new administrative efforts.

The *Administrative Guidelines; Student Services, Amenities, Representation and Advocacy Guidelines; and Student Services and Amenities Fees Guidelines* that underpin the Bill have not yet been published. These are crucial to assessing the implications of the Bill. In particular, the Guidelines will contain information about dates on which the Fees may be applied; this will have direct relevance for enrolment dates, system capacities and load-based calculations. UniSA recommends that the HELP census dates are adopted consistently across the sector as the recognised dates for applying all types of HELP loan. UniSA urges the Government to release the Guidelines rapidly, to ensure that institutions can implement the proposed system in an informed and timely way.

Yours sincerely



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