

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

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">Online and distance learning are defined in the standard.	DO NOT SUPPORT	See below
<ul style="list-style-type: none">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.	DO NOT SUPPORT	
<ul style="list-style-type: none">Higher education and VET providers must not deliver more than one-third of a student's course online.	DO NOT SUPPORT	

We are keenly interested in this issue as our CRICOS application was bedevilled by our application of online technology causing huge difficulties for TEQSA who felt that the ESOS Act needed to be adjusted to take into account our more nuanced and modern delivery of online courses. Something which we are naturally grateful to see that you are undertaking in this revision.

This is the current proposed definition in Standard 8 of the ESOS Act which we believe is worthy of commenting on:

Modes of delivery

Note: Online learning uses digital media, technology-based tools and IT networks to deliver a course to a student and does not require the student to attend regular classes or maintain contact hours. For the purposes of the ESOS framework, it is not intended that the provision of online lectures and other asynchronous tuition or resources be defined as online learning. Distance learning is any learning that a student undertakes off campus and does not require a student on a student visa to physically attend regular tuition for the course on campus at the provider's registered location.

8.17 A registered provider must not deliver a course exclusively by distance learning to a student on a student visa.

8.18 A registered provider must not deliver more than one-third of the units (or equivalent) of a higher education provider or VET course online to an overseas student as defined in section 5 of the ESOS Act.

Our comments are:

1. In the above definition, it is unclear what 'online learning' is allowed and what isn't. In the definition above, it says that: For the purposes of the ESOS Framework, it is not intended that the provision of online lectures and other asynchronous tuition or resources be defined as online learning.
2. Presumably this means that a live synchronous session with a live instructor interacting in real time with a student is equivalent to classroom mode and there are no restrictions on this mode of delivery i.e. this type of online learning does not fall under the 'not deliver more than one third of the units' restriction in 8.17? Please confirm this is the case.

If this is not the case; we would suggest that online learning is broken up in the definition to;

Synchronous and Asynchronous online learning.

Asynchronous (videos, Learning Management System resources and equivalent)

Synchronous (live interactive sessions using web and video conferencing)

The Asynchronous model is probably the cause of a significantly high attrition rate as there is often very little interaction between students and instructors and the intrinsic motivation has to be high in students to allow them to complete their courses. We thus believe this form of online learning should be restricted.

The asynchronous should be restricted as per 'the third' restriction in section 8.18 above and synchronous should be treated like a (virtual) classroom and be allowed up to 100%. This will ensure that a high level of quality is maintained.