



9 December 2016

Australian Government Productivity Commission
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Re: Productivity Review

To whom it may concern

Independent Schools Victoria (ISV) welcomes the opportunity to participate in the submission process for the Productivity Review Public Inquiry. This submission is made on behalf of ISV's Member Schools.

This submission focusses on two areas of concern for Independent schools – town planning and competitive neutrality for the enrolment of international students.

Non-Government schools have town planning guidelines that add obligations, costs, administrative requirements, and lead times that government schools are exempt from.

All schools are able to compete for international students. Non-government schools have associated registration requirements that are the financial and administrative responsibility of individual schools. The same responsibilities do not apply to individual government schools.

Independent Schools Victoria

ISV was established in 1949 and today represents, promotes the interests of, and provides services to more than 210 Member Schools. These schools educate almost 135,000 students on more than 300 campuses across metropolitan Melbourne and in regional and rural Victoria, and employ more than 17,500 teachers and other staff. Many schools provide vocational education and training, as well as substantial services beyond school education, including long day care, out of school hours care, kindergarten programs and pre-Prep programs.

This submission is shaped by the educational, social and philosophical diversity of the Victorian Independent sector. Our membership reflects a variety of religious faiths and ethos, with schools affiliated to Anglican, Assemblies of God, Baptist, Brethren, Catholic, Christian, Coptic Orthodox, Greek Orthodox, Jewish, Lutheran, Islamic, Pentecostal, Presbyterian, Seventh-day Adventist and Uniting churches. There are inter, multi and non-denominational schools, as well as schools for students with learning difficulties and

individual needs and schools adhering to the Montessori and Steiner education philosophies.

Town Planning

To accommodate and cater for the needs of students and school communities, Independent schools often undergo capital development to expand, adapt and build new facilities. The needs of learners and the school change and evolve, and schools plan strategically for capital development, allocating and raising funds to ensure the best facilities can be built within the appropriate budget.

Non-government schools are subject to town planning approvals that government schools are exempt from. *The Town Planning Guidelines for Non-Government Schools* provide a general guide to Victoria's Planning Schemes, to assist non-government schools applying for planning permits to extend or upgrade their buildings and grounds. These guidelines give general information on planning schemes, and the legislative requirements councils must consider when deciding on applications for planning permits.

Indicative time for permit approval can be as long as 12 – 18 months for applications for additional portable classrooms, new playgrounds and major works, and up to 6 months for minor upgrades to playgrounds, outdoor furniture, shade sails, and lifts/ramps. This process is further complicated by the fact that planning requirements of local councils may differ.

All costs associated with preparing and lodging permit applications are met by the school, including the cost of making any required amendments to plans. In some instances, plans have been changed to incorporate, for example, car parking, traffic management and roundabouts. The need for these can be contested as unnecessary, yet they place a significant financial burden on schools.

This results in a lag time in commencing the building as schools comply with planning requirements. As well, the additional cost of meeting town planning requirements can force schools to downgrade the size and scale of the capital works program, resulting directly in lost productivity.

This is an obligation, cost, investment in time and resources, and increase in lead times that government schools are exempt from.

International Students

Competitive neutrality for international students is important when schools seek to enrol international students.

Prior to providing education to overseas students, an organisation must first be registered on the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) for the course and the state or territory in which delivery will occur.

Registered schools seeking CRICOS approval must comply with the requirements of the National Code of Practice for Registration Authorities and Providers of Education and Training to Overseas Students, the Education Services for Overseas Students (ESOS) Act

2000 (as amended in 2010) and other legislative requirements in order to obtain approval in Victoria and meet quality assurance requirements for the specified courses.

Independent schools have to obtain individual registration for CRICOS, with significant costs associated for each school. This differs from the Victorian Government Department of Education and Training, which has one registration for all government schools with international students.

The associated costs incurred by Independent schools does not allow for neutral competitiveness when attracting international students, as all costs are passed on to potential international students when they enrol.

In summary, Independent schools face regulatory, administrative and other obligations in town planning and in recruiting international students that are not required of government schools. These obligations impose additional costs in ways that undermine competitiveness and impede productivity.

Yours faithfully

A handwritten signature in black ink that reads "Michelle Green". The signature is written in a cursive, flowing style.

Michelle Green
Chief Executive