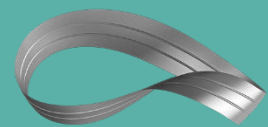

OVERSEAS STUDENT
HEALTH COVER
CONSULTATION
PAPER - IMPROVING
THE OVERSEAS
STUDENT HEALTH
COVER PROGRAM -
MAY 2024

ISA SUBMISSION

24 June 2024



INDEPENDENT
SCHOOLS
AUSTRALIA

Acknowledgement of Country

Independent Schools Australia acknowledges the traditional custodians of country throughout Australia and recognises the continuing connection to land, waters and community. We pay respect to Elders past and present, and commit to the ongoing journey of reconciliation.



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1. ABOUT ISA

Independent Schools Australia (ISA) is the national peak body for Independent schooling in Australia. ISA represents the sector on national issues and engages with the Australian Government, national agencies, media, key stakeholders, and the wider Australian community.

Working with the eight state and territory Associations of Independent Schools (AISs), ISA represents 716,800 students, over 1,215 schools and a workforce of 122,000 people.

The Independent sector encompasses considerable diversity in size and location of schools, and the types of students enrolled. The latest available data shows that more than one in six Australian school students attends an Independent school. For secondary students, it is over one in five. Students at Independent schools reflect the full diversity of Australian society – including those who experience one or multiple forms of disadvantage.

Most families with children enrolled in non-government schools are middle-to-low-income earners, increasingly from culturally diverse backgrounds, and residing in outer-suburban and inner-suburban communities. Many of these families are currently facing economic stress and are making substantial sacrifices for their children's education.

Many Independent schools provide a religious or values-based education. Others promote a specific educational philosophy or interpretation of mainstream education. Some have been established by community groups seeking to meet particular needs or to reflect the religious values of a community. Independent Catholic schools are a significant part of the sector, accounting for eight per cent of the Independent sector's enrolments.

Most Independent schools are set up and governed independently on an individual school basis. However, some schools with common aims and educational philosophies are governed and administered as systems, for example, Lutheran schools. Systemic schools account for 20 per cent of schools in the sector.

Independent schools are long-established partners in Australia's education system, alongside government and Catholic schools. They make a valuable contribution to society and the learning and wellbeing of all children. ISA also represents the National Catholic Education Commission (NCEC) in matters relating to International Education.

2. OVERSEAS STUDENT ENROLMENTS IN NON-GOVERNMENT SCHOOLS

Non-government schools generally enrol relatively small numbers of overseas students compared to domestic students and often do so to achieve diversity in their student cohorts. Their focus in International Education programs is on their students and student outcomes, not on profits. They are generally considered to be low-risk providers.

While the non-government school sector has a large number of individual providers registered on the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS), the overall student numbers in the sector are small. The school sector enrolls two per cent of total overseas

student enrolments¹ with the non-government school sector enrolling less than one per cent of total overseas students. Most overseas students in the non-government school sector are enrolled in the secondary years of education and most will be enrolled in schools while they are under 18 years of age.

According to Year to Date (YTD) overseas student enrolment data for December 2023,² non-government schools enrolled 4,744 overseas students.

3. BACKGROUND

The Australian Government Department of Health and Aged Care has published an Overseas Student Health Cover (OSHC) Issues Paper (May 2024).

Overseas Student Health Cover (OSHC) is health insurance specifically available to overseas students and their dependants and is a mandatory requirement under the Department of Home Affairs' Student Visa conditions whilst the student is in Australia.

The Department of Health administers the [Deed for the Provision of Overseas Student Health Cover](#). This is a signed agreement between Australian-registered private health insurers and the Commonwealth which sets out the conditions that insurers must comply with in offering OSHC products and services. The current Deed expires on 30 June 2025.

The Department is requesting input from stakeholders to assist with improving the Overseas Student Health Cover program before the next Deed is signed.

Three consultation areas are outlined in the Issues Paper:

- Publication of product information on privatehealth.gov.au website using templates similar to Private Health Insurance Statements to allow consumers to more easily compare coverage.
- Caps on payments by insurers to third party agents for non-healthcare services to reduce the cost of these services to the consumer.
- Removal or reduction in waiting period for pregnancy related care for some or all policies to enable better access to reproductive services.

4. CHANGE 1: PUBLICATION OF OSHC PRODUCT INFORMATION ON PRIVATEHEALTH.GOV.AU

ISA supports this change. Design of the product comparison tool or webpage should take into account the mandatory requirement for a student to pay for OSHC for visa length, which may vary from a few months to five years.

5. CHANGE 2: CAPS ON CERTAIN PAYMENTS BY INSURERS TO THIRD-PARTY AGENTS

ISA supports this change in principle, providing educational institutions are not disadvantaged by the change if they have good reasons for recommending a preferred provider, such as minimising

¹ <https://www.education.gov.au/international-education-data-and-research/international-student-monthly-summary-and-data-tables#toc-international-student-data-for-the-year-to-date-ytd-march-2024> accessed 13 June 2024

² From pivot tables available in Austrade's registered user content at: [Download student data - Education Data and Insights | Austrade](#), accessed 30 May 2024.

administrative burden if assisting students, or parents of students (if students are under 18 years), to apply for or renew OSHC policies.

6. CHANGE 3: WAITING PERIODS FOR PREGNANCY-RELATED CARE

ISA supports this change. In particular, ISA supports the recommendation of the Senate Standing Committee on Community Affairs inquiry into the universal access to reproductive healthcare *Ending the postcode lottery: Addressing barriers to sexual, maternity and reproductive healthcare in Australia*, “that the Australian Government work with relevant overseas health insurance providers to amend Schedule 4d of the Overseas Student Health Cover Deed to abolish pregnancy care related wait periods”.

7. CONCLUSION

ISA supports the proposed changes as outlined in the Overseas Student Health Cover (OSHC) Issues Paper (May 2024) noting the caveats outlined above.

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