



# Education Queensland International Guidelines for VET in schools delivered to overseas students

Implementation date: 25 September 2020

## Table of Contents

<b><i>Introduction</i></b> .....	<b>3</b>
<b><i>Relevant Legislation</i></b> .....	<b>3</b>
<b><i>Conditions of VET delivery</i></b> .....	<b>3</b>
VET delivered by ISP participating schools .....	3
External RTO arrangement .....	4
<b><i>Responsibility of schools</i></b> .....	<b>4</b>
<b><i>Disclosing delivery arrangement</i></b> .....	<b>7</b>
VET delivered by ISP participating schools .....	7
External RTO arrangement .....	7
<b><i>Record Keeping</i></b> .....	<b>8</b>
VET delivered by ISP participating schools .....	8
External RTO arrangement .....	8
<b><i>Responsibility of EQI</i></b> .....	<b>9</b>

## Introduction

---

These guidelines provide state schools accredited under Education Queensland International's (EQI) Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) registration with information about delivering Vocational Education and Training (VET) components to overseas students holding a Subclass 500 (schools) visa.

The VET qualification, or component of a VET qualification, can be delivered as part of an overseas student's QCE program either:

- by the school in its capacity as an RTO; or
- by an external RTO engaged by the school.

A school participating in the International Student Program (ISP) that is registered as an RTO can offer VET (Certificate I-IV) to an overseas student as part of the student's main course of study without the need of additional procedural steps other than [attendance](#) and [course progress monitoring](#). When a school chooses to engage an external registered RTO (either with or without CRICOS registration) or chooses to offer a school delivered diploma they must provide additional information regarding the arrangement to the Designated State Authority (DSA). EQI and the DSA have co-developed an [online form](#) to assist ISP participating schools disclose these external arrangements.

***ISP participating school providers should not offer VET in Schools as an option to overseas students unless they are able to meet their obligations under the ESOS Act with respect to that component.***

These guidelines provide information on:

- Relevant legislative requirements
- The conditions under which a school may deliver VET to overseas students
- Requirements for delivering VET in schools to overseas students
- Ongoing accreditation and reporting requirements

## Relevant Legislation

---

- [Education Services for Overseas Students \(ESOS\) Act 2000](#)
- [ELICOS Standards 2018](#)
- [National Vocational Education and Training Regulator Act 2011](#) (NVETR Act 2011)
- [National Code of Practice for Providers of Education and Training to Overseas Students 2018](#)

## Conditions of VET delivery

---

VET delivered by ISP participating schools

ISP participating schools who are registered as RTOs can offer any VET qualification registered on its scope to an overseas student who wishes to study the VET qualification to accrue points towards a QCE.

It is at the discretion of ISP participating schools as to what courses are offered to international students. Where a school offers VET to domestic students, there is no obligation to offer the same options to overseas students. Schools must clearly communicate VET options available to overseas students through the school's marketing material.

The ISP participating school is not expected to register these VET qualifications as separate courses on CRICOS or with EQI. Where the school intends to deliver a full VET qualification, such as Certificate III, the school must ensure the method of course delivery, including the amount of training provided, will enable the student to complete all the units of competency necessary to gain that qualification during their secondary school studies.

RTO registered ISP participating school course costs must be covered by tuition, with no further costs to the student.

## External RTO arrangement

ISP participating schools may partner with an external RTO (with or without CRICOS registration) to deliver the VET components. An external RTO would be either:

- a Registered Training Organisation, approved by the Australian Skills Quality Authority (ASQA);  
or
- another school that is a Queensland Curriculum and Assessment Authority (QCAA) approved RTO.

The external RTO is not required to be CRICOS registered or hold CRICOS registration for the course (or component of the course) that is delivered to an overseas student as part of the student's QCE studies, so long as the VET components are within the scope of the ISP participating school course CRICOS registration.

Both, RTO and non-RTO ISP participating schools must clearly communicate VET options available to overseas students through the ISP participating school's marketing material under [Standard 2.1](#) of the National Code.

## Responsibility of schools

---

Regardless of whether the school delivers the VET component, or partners with an RTO to deliver the VET component, the school will be responsible to meet the requirements under the [National Code of Practice for Providers of Education and Training to Overseas Students 2018](#).

### General VET Delivery Checklist (all)

Department of Education  
*Trading as* Education Queensland International  
CRICOS Provider Code 00608A



□	<b>Update school marketing material with information about VET courses available to overseas students</b>	ISP participating schools can meet this obligation by outlining courses available for overseas students on the International tab of their website or the Senior Secondary Curriculum handbook, including additional costs if not covered by tuition.
□	<b>ISP participating school based monitoring and reporting</b>	Regardless of who is delivering the course, in accordance with accreditation requirements, the school must monitor and report on: <ul style="list-style-type: none"> <li>• <a href="#">course attendance</a></li> <li>• <a href="#">course progress</a></li> </ul> <p>ISP participating schools must also provide appropriate support services for students.</p>

### External RTO Arrangement Checklist

In addition to the above, ISP participating schools who have engaged an external RTO to deliver any VET components (partially or in their entirety) to overseas students, must ensure they have completed the following.

BEFORE engaging overseas students with an external RTO arrangement		
□	<b>Formalise arrangement with VET provider</b>	An external RTO arrangement can be made with: <ul style="list-style-type: none"> <li>• a Registered Training Organisation, approved by the Australian Skills Quality Authority (ASQA); or</li> <li>• another school that is a QCAA approved RTO.</li> </ul> <p>ISP participating schools must consider accreditation and reporting requirements when creating an MoU with the provider.</p>
□	<b>Declare the VET delivery arrangement to the DSA</b>	Complete the “CRICOS – registration of delivery arrangements with partner RTOs” form after submitting an expression of interest <a href="#">online here</a> .
□	<b>Provide course information to student and parents</b>	Information including cost, course credits, QCE eligibility and National Code (Standard 2.1) must be provided to the student and their parents. <p><a href="#">Standard 2.1</a> of the National Code requires providers to ensure overseas students have access to comprehensive information about:</p> <ul style="list-style-type: none"> <li>• the content of the course (i.e. the school’s Senior Secondary program including any subjects or VET</li> </ul>

		<p>qualification options that the school offers overseas students); and</p> <ul style="list-style-type: none"> <li>any delivery arrangements that apply to any part of the student's intended course of study.</li> </ul>
<b>AFTER registering the external RTO arrangement</b>		
□	<b>Notify EQI to update student agreement</b>	<p>Where a student elects to incorporate a VET component into their Senior Secondary studies, and the VET component is outside of the school's approved RTO scope, the additional component must be reflected as an amendment to the written agreement in the form of an email to the parent, providing details of the VET component that the student will be undertaking.</p> <p>Contact EQI at <a href="mailto:EQInternational@qed.qld.gov.au">EQInternational@qed.qld.gov.au</a> with student VET enrolment details so that EQI can update the student enrolment agreement with details of VET study.</p> <p>The ISP participating school should keep a record of all correspondence as evidence that the parent agrees to the amendment in OneSchool. Where additional fees apply for the VET components, these must be detailed in the student's written agreement or as an amendment to the student's agreement issued by EQI.</p>
□	<b>ISP participating school to invoice parents for additional costs</b>	<p>Any additional fees the student may incur as a result of the VET component should be paid directly to the school by the student to ensure that the school can meet its obligations under the ESOS Act in the event that the school's partner RTO closes or is otherwise unable to deliver the VET component.</p> <p><i>As the VET component falls under EQI's CRICOS registration, the student's tuition fees for the course (including the VET components) are protected by virtue of the school's CRICOS registration</i></p>
□	<b>Enrol student in course</b>	<p>Enrol student in VET course that they wish to include in their Senior Secondary studies.</p> <p>Information about the VET arrangements must be provided <u>before</u> an overseas student can be enrolled in the course.</p>

□	<b>ISP participating school to inform VET provider of overseas student arrangement</b>	ISP participating schools should inform the RTO partner of any overseas students enrolled in the course to improve compliance monitoring.
---	--	---

Given that ISP participating schools are responsible for the actions of the partner RTO in regard to VET delivery for overseas students, schools should consider formalising the agreement with any RTO that they may partner with.

- Where the VET components are delivered at another location, the school may be required to demonstrate to the International Quality Schools Unit (the DSA for Queensland schools) that the delivery site is an approved delivery location for the purposes of providing the VET training. The school must also ensure that the partner RTO, if delivering VET components at a separate location, has adequate facilities and equipment to deliver these components.
- If the school provider is no longer able to deliver the school course to the student, they will be in provider default, as under [Section 46A of the ESOS Act](#).
- If the RTO the school has partnered with closes or is otherwise unable to deliver the VET component, the school must ensure that the student is still able to complete the secondary school course for which their visa has been issued. This could mean engaging an alternative VET provider to deliver the VET components or if this is not possible, offering alternative secondary school subjects which meet the requirements for completing the school qualification.

## Disclosing delivery arrangement

---

### VET delivered by ISP participating schools

Where the ISP participating school is offering a VET qualification, or components of a VET qualification, in its capacity as a QCAA approved RTO, there is no need for the school to provide further information about the arrangement.

However, if the ISP participating school chooses to extend its VET course offerings by partnering with an external RTO or another school RTO, then the delivery arrangement with that RTO will need to be declared to the DSA and EQI.

### External RTO arrangement

Where an ISP participating school partners with an external RTO, or another school (ISP or non-ISP) that is a QCAA approved RTO, to offer an overseas student the opportunity to incorporate a VET component into their Senior Secondary (QCE) program, the school will need to declare the delivery arrangement with the DSA and EQI. The following details are required:

- the full legal entity and trading name of the RTO
- the RTO code
- a list of qualifications offered to overseas students

- where the school chooses not to offer a full qualification, a list of units of competency offered
- the delivery location of each VET qualification / component (i.e. onsite at the school's registered location or at the RTO's business location).

The school will also need to confirm that:

- it has processes in place to meet its obligation to monitor course progress and attendance for all overseas students while they are studying with their partner RTO; and
- where the VET component is being delivered at a location external to the school, the school has confirmed that the RTO is approved by the Australian Skills Quality Authority (ASQA) to deliver the course at the nominated location.

ISP participating schools must provide information about their VET delivery arrangement by completing the "CRICOS – registration of delivery arrangements with partner RTOs" form by submitting an expression of interest [online here](#).

VET arrangements must be declared before an overseas student can be enrolled in the course.

## Record Keeping

---

Schools are responsible for keeping the following documentation that should be made available at audit:

### VET delivered by ISP participating schools

- evidence that the school has monitored the student's attendance and course progress for all subjects, including any VET components / qualifications, and taken steps to advise the students of any attendance or course progress concerns; and
- evidence that the school has advised the student of any associated costs involved with the student's enrolment in any VET qualification or component that contribute towards the student's QCE.

### External RTO arrangement

- a copy of the agreement or MoU between the school and the partner RTO;
- evidence that the school has monitored the student's attendance and course progress while studying with the school's RTO partner and taken steps to advise the student of any attendance or course progress concerns; and
- evidence that the school has advised the student of any associated costs involved with the student's enrolment in any VET qualification or component that contribute towards the student's QCE.

## Responsibility of EQI

---

As the registered provider of the course, EQI can be held responsible for any breaches of the ESOS framework with respect to that course whether the breaches arise from actions by the school or the partner RTO it has engaged. As such, any VET arrangements within schools will be monitored as part of ongoing accreditation requirements.

### EQI Checklist

<input type="checkbox"/>	<b>EQI to check VET list</b>	Before proceeding to make contact with the parent, ensure that the course and provider is on the VET list. If the course information isn't available, for the school location direct the school to provide the relevant information at this point.
<input type="checkbox"/>	<b>EQI to update student agreement</b>	<p>Where a student elects to incorporate a VET component into their Senior Secondary studies (other than RTO school registered), the additional component must be reflected as an amendment to the written agreement in the form of an email to the parent, providing details of the VET component that the student will be undertaking.</p> <p>Once the school has provided details of the enrolment agreement, EQI staff are to amend the agreement as per <a href="#">Ongoing enrolment – Subclass 500 (schools) visa procedure</a>.</p> <p>All correspondence between schools and parents should be recorded in OneSchool and placed against the student file.</p>
<input type="checkbox"/>	<b>EQI to monitor accreditation</b>	EQI to check schools meet requirements under <a href="#">National Code of Practice for Providers of Education and Training to Overseas Students 2018</a> as part of accreditation monitoring.