



# UNSW Submission – Senate Education and Employment Legislation Committee: Education Legislation Amendment (Integrity and Other Measures) Bill 2025

UNSW Sydney welcomes the opportunity to contribute to the Senate Education and Employment Legislation Committee’s inquiry into the *Education Legislation Amendment (Integrity and Other Measures) Bill 2025*. UNSW supports the Bill’s overarching objective to strengthen integrity, transparency, and accountability across Australia’s higher education system, while promoting equitable access and sustaining the global reputation of Australian education. By enhancing public confidence and institutional standards, the Bill will reinforce the credibility of Australia’s international education sector - both domestically and globally - ensuring that the economic, social, and cultural benefits derived from the sector continue to flow to the broader Australian community.

The Bill represents a constructive evolution of the existing legislative framework. Its measures build upon reforms to the *Education Services for Overseas Students (ESOS) Act 2000* and the *Tertiary Education Quality and Standards Agency (TEQSA) Act 2011*. These reforms respond to emerging challenges and opportunities in a dynamic education environment.

However, as the Bill is considered, UNSW encourages the Senate to ensure that the legislation remains fit for purpose by calibrating regulatory requirements to the level of risk posed by different categories of providers. In particular, this should recognise that highly regulated institutions, such as Table A and B providers, and their wholly owned subsidiaries (such as UNSW College), present a significantly lower risk than other provider types.

## Strengthening Integrity in International Education

UNSW endorses the Bill’s measures to enhance transparency in education-agent arrangements and strengthen oversight of international education delivery. Enhanced reporting and monitoring of agent commissions and referral practices will strengthen public confidence in the quality of Australia’s international education system and provide greater protection for students.

UNSW supports a balanced and proportionate approach to risk that upholds rigorous integrity standards without duplicating administrative processes. We encourage the Department to provide clear guidance, transitional support, and consistency across agencies as new reporting and compliance mechanisms are established.

## Supporting Indigenous Participation and Equity in Medicine

UNSW strongly supports the proposed removal of the cap on Commonwealth Supported Places (CSPs) for Aboriginal and Torres Strait Islander students in medical programs. This reform represents both a practical and symbolic step toward improving representation of First Nations peoples within the health professions and contributes directly to the *Closing the Gap* targets in health equity.

UNSW's Faculty of Medicine & Health hosts nationally recognised programs, including the Nura Gili Pathways Program and the Rural Clinical School, which demonstrate that equitable access must be supported by culturally safe learning environments, mentoring, and sustained community engagement.

We encourage Government to complement reforms with targeted investment in student support, retention, and initiatives to ensure that participation translates into enduring achievement.

## Strengthening Quality and Accountability for Offshore Delivery

The Bill's amendments to the *TEQSA Act* and *ESOS Act* clarify authorisation requirements and strengthen reporting obligations for offshore course delivery. UNSW supports these reforms as essential to maintaining the integrity of Australian qualifications in an increasingly interconnected, global education system.

As a globally engaged university with longstanding international partnerships, UNSW is committed to ensuring that offshore programs deliver the same quality and learning outcomes as those delivered onshore. Stronger quality assurance frameworks will reinforce the credibility of Australian higher education internationally and reinforces the principle that an Australian degree must always uphold Australian standards, wherever it is delivered.

However, as universities are already among the most closely regulated entities in the sector, additional compliance measures should be applied only where there is demonstrable risk or limited existing oversight.

We recommend that implementation be informed by close consultation with providers that have established transnational operations, including UNSW College, to ensure that approval and reporting requirements remain proportionate, practical, and outcomes focused.

## Implementation, Partnership, and Continuous Improvement

UNSW notes that the Bill introduces changes across multiple legislative instruments within the higher education regulatory architecture. To support effective implementation, we recommend:

- **Clear and consistent guidance** on the interaction between new and existing ESOS and TEQSA obligations;
- **Adequate transition timelines** to allow alignment of institutional systems and processes;
- **Ongoing consultation** with the sector and the co-design of regulations, ensuring the development of practical compliance tools and reporting mechanisms; and
- **Regular review mechanisms** to evaluate the effectiveness of reforms against their intended policy outcomes.

The success of the Bill will also depend on coordinated implementation and adequate resourcing across government agencies. Integrity reforms should be supported by investment in regulatory capability, digital infrastructure, and transparent communication with providers and students.

### **Advancing Australia's Global Education Reputation**

The *Integrity and Other Measures Bill 2025* reinforces Australia's standing as a trusted provider of world-class education. A transparent and high-quality higher education system is central to national prosperity, international collaboration, and Australia's global influence. UNSW stands ready to work in partnership with Government, TEQSA, and the wider sector to ensure that integrity reforms enhance, rather than constrain, the innovation and excellence that define Australia's higher education sector.

### **Conclusion**

UNSW welcomes the Bill as a timely and forward-looking reform that strengthens the foundations of integrity, equity, and quality in Australian education. We particularly commend:

- The strengthened integrity measures for international education;
- The removal of caps on Indigenous medical student places; and
- The reinforcement of quality assurance in offshore delivery.

We encourage the Government to continue working collaboratively with the sector to implement these measures in a manner that is both proportionate and consistent with Australia's reputation for educational excellence.

Should you wish to discuss any aspect of this submission, please contact: **Duncan McDonald, Senior Manager, Government Relations and Policy** – [Duncan.mcdonald@unsw.edu.au](mailto:Duncan.mcdonald@unsw.edu.au) | 0422 447 674