



Australian Government

Australian Government Response to the
*Joint Standing Committee on Foreign Affairs,
Defence and Trade*
report:

*'Quality and Integrity - the Quest for Sustainable Growth':
Interim Report into International Education*

MARCH 2026

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Overview

On 20 October 2022 Senator the Hon Don Farrell, Minister for Trade and Tourism, asked the Joint Standing Committee on Foreign Affairs, Defence and Trade (JSCFADT), through its Trade Subcommittee (the Committee), to inquire into Australia's tourism and international education sectors (the Inquiry).

The Inquiry explored the challenges and opportunities presented to both sectors since the reopening of Australia's borders in February 2022.

The Terms of Reference (TOR) for the Inquiry were focussed on capturing the challenges in international education associated with recovery from the COVID-19 pandemic and future opportunities to support innovation, a positive student experience for international students, and strategic and foreign policy objectives. The TOR in full is available on the [Inquiry's home page](#)).

The Committee tabled its interim report on 19 October 2023. The report includes 29 recommendations for the international education sector, addressing issues raised through the hearings. Key themes include education and migration agents, skilled-work pathways, new and expanding markets and market development, regulation and accreditation bodies, data and reporting, transparency, and communication with students. The majority of recommendations focus on the integrity of the sector.

Government response

The Australian Government welcomes the interim report titled 'Quality and Integrity - the Quest for Sustainable Growth': Interim Report into International Education'. The Government notes the recommendations broadly align with its priorities and recent reforms to strengthen the quality and integrity of the international education sector.

International education is a great Australian success story. It is Australia's fourth largest export sector, behind coal, iron ore and natural gas¹. International students bring significant value to our communities, classrooms and campuses. Our international education system must have the right settings to provide the highest quality experience for all students and maintain Australia's world-class reputation for delivering education.

The Australian Government released the Draft International Education and Skills Strategic Framework (draft Framework) on 11 May 2024. Under the draft Framework, the Government committed to implementing a managed system for international education, to support sustainable growth and ensure that Australia remains a prestige, high-quality, high-integrity provider of international education. Government remains committed to finalising the Framework in cooperation with the international education sector.

On 18 December 2024, the Government introduced *Ministerial Direction 111 (MD111)– Order for considering and disposing of offshore Subclass 500 (Student) visa applications*. MD111 supported a more sustainable international education sector through changes to the prioritisation of resources for student visa processing under the 2025 National Planning level (NPL) of 270,000 New Overseas Student Commencements (NOSCs).

On 14 November 2025, MD111 was replaced with *Ministerial Direction 115 (MD115) – Order for considering and disposing of offshore Subclass 500 (Student) visa applications* to guide student visa processing priorities for 2026, in line with indicative NOSC allocations.

The Hon Julian Hill MP was appointed as Assistant Minister for International Education in May 2025, in recognition of the important role international education plays for Australia. In August 2025, Government announced policy settings for a managed international education system, underpinned by an NPL of 295,000 NOSCs for 2026 and incentives for providers who make a genuine effort toward greater diversification and improved student wellbeing, including through the provision of adequate student accommodation.

In November 2025, the Education Legislation Amendment (Integrity and Other Measures) Bill 2025 (the ELA Bill) was passed by Parliament, improving protection for genuine international students who have chosen to study in Australia and securing the sector's reputation both domestically and overseas. The ELA Bill reintroduced integrity amendments from the Government's lapsed Education Services for Overseas Students Amendment (Quality and Integrity) Bill 2024. It also introduced new measures that will enhance the Tertiary Education Quality and Standards Agency's (TEQSA) oversight of offshore course delivery by registered Australian higher education providers.

¹ [Education export income - Financial Year - Department of Education, Australian Government](#)

In the interim report the Committee recognised the need for determined and focused actions against unscrupulous providers to combat the systemic exploitation of Australia's education and migration systems and better regulate education agents, ensuring Australia remains a place where the best and brightest students can come and get the best education in the world. Government will continue to act to prevent the exploitation of students and protect Australia's reputation as a high-quality international education provider. This Australian Government Response outlines several key reforms which address issues raised in the interim report.

Recommendations and Responses

Recommendation 1

The Committee recommends the Government lead a 'Team Australia' program to build a stronger national international education brand and platform and agree on a five-year prioritised Market Diversification Plan. An enhanced Team Australia approach will:

- better coordinate through shared agreements, Australian Government agencies (Department of Education, Department of Home Affairs, Department of Employment and Workplace Relations and Austrade), state and territory governments and the sector
- build and maintain a national platform and approach to promote Australia's quality education within a fiercely competitive international arena
- address issues of fragmentation, duplication, and divisive competition in the current marketing of Australian education to the world.

Team Australia should prioritise the development of a five-year Market Diversification Plan into new and emerging geographic markets. The five-year plan should have shared governance and be resourced across the sector including federal, state and territory contributions. The plan should:

- identify and agree on a limited number of priority countries for joint focus in sub-Saharan Africa, Southeast Asia and South and Central America (considering for example Nigeria, Kenya, Botswana, Zimbabwe, Indonesia, Vietnam, the Philippines, Brazil, Colombia and Chile)
- consider innovative ways to fund places for students of the Blue Pacific to study in Australia and seek to deepen international education ties within the Pacific Island Development (PID) Forum to advance democracy and support peace and prosperity within our region
- form agreed migration and education settings to enable and encourage the best and brightest international students from identified priority countries to study in Australia, including Department of Home Affairs permitting lead providers to take approved and calculated risks in the early phases of market development without affecting their visa ratings
- drive diversification of education offerings in traditional markets, with a focus on India
- be jointly resourced by both the Government (via Austrade) and the sector, potentially via a light touch time-limited marketing levy on Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) providers subject to shared governance so those who pay a levy have influence over how it is spent.

The Australian Government **notes** this recommendation.

Team Australia

The Government is committed to a 'Team Australia' approach, encompassing Commonwealth departments and agencies, states and territories, peak bodies, and education providers.

The Australian Trade and Investment Commission (Austrade) is the Australian Government agency with responsibility for promoting Australian education globally. Austrade is the

custodian of Australia's Nation Brand and uses this branding when promoting Australia's education sector internationally, as Study Australia, including through supported use of the Study Australia Marketing (and Brand) Toolkit. Austrade also aggregates and disseminates whole-of-government information to global audiences via the Study Australia website, digital, and social channels. Additionally, Austrade is the policy, program, and official statistics lead for tourism, which incorporates international education as a significant source of travellers.

Austrade's work in international education is complemented by close engagement with the Australian Government Department of Education, including leveraging the department's role in driving policy development with priority partner countries to support qualifications and course recognition, greater systems alignment, and addressing barriers to growth. Austrade works closely with the Department of Foreign Affairs and Trade (DFAT), including on the implementation of education and skills sector recommendations in *Invested: Australia's Southeast Asia Economic Strategy to 2040*; recent collaborative activities include Southeast Asia Business Exchange (SEABX) business missions focused on education, skills, and transnational education.

Austrade also works with states and territories through the Study Australia Partnership – a formal collaboration between Austrade and all state and territory study destination agencies, to co-design and execute projects that support and promote Australia's international education sector.

Diversification

The Government recognises the critical importance of market diversification to the sustainability of Australia's international education sector. Engagement with Southeast Asia is an Australian Government priority and policy settings in the managed growth approach incentivise international education providers to increasingly diversify to this region.

Diversification of international education markets also supports the visiting friends and relatives' (VFR) segment of Australia's visitor economy. As noted in the International Diversification Strategy for the Visitor Economy Discussion Paper and related industry consultations, a proposed focus on growing VFR travel from the new and emerging markets of India and Southeast Asia would have strong synergies with international education diversification.

In line with the Government's Southeast Asia 2040 strategy, Austrade is supporting engagement with Southeast Asia through SEABX, with regional trade missions involving 72 Australian education and skills providers to date.

International education sector diversification extends beyond student source countries, encompassing learner types, courses and fields of study, modes and models of delivery, and locations of study within Australia and internationally (for example, transnational education or building on the collaborative foundations of the Study Australia Partnership).

The Government will continue to work closely with the regulators, the Tertiary Education Quality and Standards Agency (TEQSA) and the Australian Skills Quality Authority (ASQA), to guide education and training providers expanding and diversifying their operations through offshore (in-country) delivery. The Government will also continue to support the sector to engage with international governments on accessing opportunities through qualifications

recognition and in-country delivery provisions enabled by bilateral trade agreements and cooperation.

Diversification opportunities will also be considered in the context of the Australian Government's International Education and Skills Strategic Framework, once finalised.

Recommendation 2

The Committee recommends the Government work with the sector to develop a more systemic approach to tracking and supporting alumni networks, including graduates of Australian education scholarships and programs, with the explicit aim of fostering enduring connections to Australia, with a focus on priority countries and strengthening Australia's international research networks and partnerships.

The Australian Government **agrees** with this recommendation.

The Government is committed to working with the sector (with its buy-in being essential) on improving approaches to alumni networks, in line with recommendations outlined in Invested: Australia's Southeast Asia Economic Strategy to 2040 and the Australian Universities Accord Final Report.

The Government recognises the value in enhancing personal and professional relationships forged between international scholars and the Australian community. It will continue to build on the success of alumni networks such as the Australia Awards alumni, New Colombo Plan (NCP), and other programs to identify more systematic and engaging ways to work with scholarship and self-funded alumni to deepen engagement in the Pacific and Southeast Asia.

The recent reforms to the NCP will deepen the program's business engagement and provide more ways to foster scholar and alumni engagement through relationship building with the private sector and business stakeholders. NCP initiatives, including the Alumni Representative Program and Alumni Consultative Group, provide support to engaged NCP alumni to promote the program and foster networks across the Indo-Pacific.

Work is ongoing to consolidate existing IT systems into a single solution or to strengthen existing systems to better support current needs.

DFAT has established an 'Australia Awards Global Support Mechanism' to deliver a coherent suite of Australia Awards services, including dedicated long term advisory support to bolster alumni engagement across the network of overseas posts. In addition to supporting the development of consistent and measurable alumni strategies at posts across Southeast Asia, the Government will further explore 'opt-in' approaches to tracking and convening alumni.

Recommendation 3

The Committee recommends the Government examine opportunities to expand programs that deliver development support to Australia's near neighbours and contribute to Australian skills needs through practical on and offshore education and training 'International traineeships', with an initial focus on aged care and allied health in regional Australia. International Traineeships should be limited to Technical and Further Education providers (TAFEs) and approved Registered Training Organisations (RTOs) and companies to maintain integrity.

The Australian Government **agrees** with this recommendation.

The Government will examine opportunities to expand skills-related support through international traineeships where critical skills shortages exist in the region. Skills and technical and vocational education and training (TVET) are integral to economic success and improved development outcomes. In March 2023, the inaugural Conference of Pacific Education Ministers agreed that developing skills pathways is a collective priority for the region.

The Government supports this priority in the Pacific. DFAT's pilot of on-the-job training of Pacific Australia Labour Mobility (PALM) scheme workers in the aged care sector in the Northern Territory and Queensland, informed the expansion of training through the PALM scheme. In April 2025, DFAT's Office of the Pacific introduced a new, regional skills program, Pacific Australian Skills, continuing Australia's longstanding support for skills and training in the region, following the conclusion of the Australia Pacific Training Coalition (APTC, 2008 – 2025). Pacific Australian Skills builds on the strong legacy of APTC, focusing on skills for employment and links with industry.

The Government's development partnerships in Southeast Asia include a strong focus on education and skills in Official Development Assistance (ODA) eligible countries such as Indonesia, Vietnam, the Philippines and throughout ASEAN. These partnerships build links with Australian institutions through the International Development Policy framework and programs such as Australia Awards scholarships, fellowships and short courses, and the New Colombo Plan. The Policy guides investment in partner-led initiatives that improve schooling, vocational training, and employment services. This will help build regional capacity, develop future leaders and leverage Australia's education institutions to further connect the region to Australia.

The Government is also establishing a new specialised scholarship program complementing Australia Awards, as well as expanding Australia Award Scholarships to Brunei, Malaysia, Singapore and Thailand. Additionally, a new Placements and Internships Pilot Program for Young Professionals (an initial \$6 million over four years) to help build enduring links between Australian and Southeast Asian businesses.

Under a system of managed growth, universities will be able to grow their student allocation where they demonstrate continued investment in Southeast Asia through their education

offerings, partnerships, campuses, alumni and scholarships. This will help drive Australia's economic, people-to-people links and two-way cultural exchange.

The Government exempts students from the Pacific and Timor-Leste from the prioritisation of offshore Subclass 500 (student) visa applications under Ministerial Direction 115, in recognition of Australia's commitment to strengthening education and employment pathways with the region. This exemption extends to other visa applications, including those students with an Australian Government sponsored scholarship and key foreign partner government scholarship holders, and students studying at an Australian education provider delivering education services internationally under a transnational education agreement.

Recommendation 4

The Committee recommends the Government engage with the international education sector and industry bodies to develop and implement targeted campaigns to educate employers on the opportunities to hire international student graduates in sectors with high skilled job vacancies. Campaigns must combat employer confusion and misinformation about graduate work rights, visa conditions and pathways to permanent residency (where available). The first campaign focus should be for engineering, information technology and health industries, followed by other skilled occupations identified in high demand.

The Australian Government **agrees in-principle** with this recommendation.

The Government notes the proposal for further information strategies and campaigns as outlined in this recommendation, as well as Recommendation 20.

The Government currently engages with the international education sector, industry bodies and employers to support awareness of rights and opportunities in the sector. The Government recognises there is value in improving employers' understanding of the benefits that international graduates can provide, including through addressing confusion or misinformation about graduate work rights, visa conditions and pathways to permanent residency.

The Government supports improving clarity around rights, obligations, and employment opportunities for the international education sector, and will continue to consult with the sector to develop information products in line with recommendations outlined in the Migration Strategy, Working Future: The Australian Government's White Paper on Jobs and Opportunities (Employment White Paper), and the International Students Pathways and Outcomes Study by Jobs and Skills Australia.

Recommendation 5

The Committee recommends the Government establish a national work-integrated learning framework to oversight work-integrated learning placements. The work-integrated learning framework and any accompanying system changes should be developed in consultation with the international education sector, industry peak bodies and accreditation bodies and the work-integrated learning peak body, taking into consideration Fair Work Requirements and ensuring robust oversight of providers and businesses to prevent student exploitation and integrity loopholes.

The work-integrated learning accreditation system should support the integration of accreditation placements into the work-integrated learning program, where appropriate. Further sandwich courses, higher education apprenticeships and other paid work and learn integrated models of study are increasingly common in jurisdictions with whom Australia competes for international students. These models offer better integration between industry and educational entities, and should be given immediate consideration by a taskforce established by the Government.

The Australian Government **agrees** with this recommendation.

The Government recognises the importance of work integrated learning to support international students to enhance their workplace and employability skills and graduate employment outcomes, while also ensuring that there is appropriate oversight of providers and businesses to comply with workplace relations laws including the *Fair Work Act 2009*, and to prevent, detect and remedy the exploitation of students.

The benefits for international students of work experience and volunteering during their studies is well documented. Through these experiences, international students build networks, develop their English language skills, and build the skills and attributes necessary to find work in their field of study.

This recommendation aligns with the 2022 Post Study Work Rights Working Group Report to the Ministers for Education and Home Affairs which notes that “additional work experience during their studies can also assist graduates to be more work ready upon graduation”.

The Government agrees to establish a work integrated learning working group to consider this recommendation in the context of other key government reforms, including the Employment White Paper, the Australian Universities Accord Final Report, the Migration Strategy, Invested: Australia’s Southeast Asia Economic Strategy to 2040, and the International Students Pathways and Outcomes Study by Jobs and Skills Australia. The Government has also committed to deepen engagement in Southeast Asia through *Invested: Australia’s Southeast Asia Economic Strategy to 2040* including encouraging universities and vocational education providers to offer work-integrated learning internships as part of course offerings to Southeast Asian students.

Recommendation 6

The Committee recommends the Government take a pro-active, interventionist approach in reviewing unreasonable barriers to qualified international student graduates filling skills shortage roles that are imposed by professional accreditation bodies, to identify opportunities to streamline and remove unnecessary requirements while preserving quality assurance. The Committee recommends these reviews target and assess, as a matter of priority, accreditation barriers and issues encountered by qualified international graduates in health and allied health professional fields. There should be a specific focus on accreditation issues in nursing, midwifery, and psychology, then professional trades and other critical skills shortage areas, as they emerge.

Consideration should be given to improving pathways to apprenticeships and work placements for both vocational education and training and university degrees for international students where skills shortages cannot be met domestically.

The Australian Government **agrees in-principle** with this recommendation.

The Government notes this recommendation aligns with work undertaken by DFAT on Mutual Recognition Agreements for Professional Qualifications. The Government will further consider matters relating to priority skills areas in line with the Migration Strategy, Australian Universities Accord Final Report, the Employment White Paper, and the International Students Pathways and Outcomes Study by Jobs and Skills Australia.

The Government recognises that occupations are generally subject to state and territory licensing and regulatory oversight, with health and allied health professions being nationally regulated by the Australian Health Practitioner Regulation Agency (AHPRA).

The Government recently released the *Guiding Principles and Standards for Skilled Migration Assessing Authorities* (the Guide) (effective 1 October 2025) to improve the approach to skills assessments for migration purposes. The Guide will be supported by new legislative powers to impose conditions on assessing authorities. The completion of this work represents a significant milestone in the journey towards greater integrity and assurance measures in skills assessments. The Government will continue to work closely with industry, migrant representatives, assessing authorities and other stakeholders to understand the opportunities for systemic changes to lift the sector and strengthen its role within the broader skills, employment and migration system.

As noted in the response to Recommendation 5, the Government recognises that work placements more broadly are critical to post-study employment outcomes, and will consider opportunities to further improve access to placements for international students, including in the context of other key government reforms.

Recommendation 7

The Committee recommends, in light of the highly dynamic nature of the international education sector and global markets and the continuously evolving policy and regulatory frameworks, an appropriate Parliamentary Committee hold a regular annual or biennial 'check-in' inquiry, either stand-alone or as part of a routine annual report inquiry by the Trade Subcommittee of the Joint Standing Committee of Foreign Affairs Defence and Trade.

The Australian Government **notes** this recommendation.

Recommendation 8

The Committee recommends the Government develop an International Education Compact for the endorsement of National Cabinet, to clarify the roles and responsibilities of respective levels of government regarding the quality and integrity standards of Australia's international education system and to improve international student experience. Such responsibilities, for example, may confirm:

- the Federal Government has lead responsibility for visa policy and processing, quality regulation (with states and territories referring Vocational Education and Training (VET) regulatory powers where necessary), agent regulation, leading the international marketing of Australian education (in collaboration with states and territories), consumer protection (including tuition protection schemes) and prevention of workplace exploitation for students
- state and territory governments have lead responsibility for domestic transport including committing to uniform public transport concessions, accommodation, student welfare, community integration measures such as volunteering and participation in Australian community life and celebrating the contribution that international students make to Australian society, and destination marketing in collaboration with the Commonwealth
- local council mayors have a special leadership role in fostering a culture of welcoming students into Australian communities and championing community inclusion
- a proposal that the Governor-General, State Governors and Territory Administrators host an annual reception with leading international students or sector and civic awards to recognise the contribution that international students make to Australia and champion greater community inclusion
- shared responsibility to support the Council of International Students Australia (CISA) and similar international student organisations to build their capabilities as a support and resource bridge between domestic and international students, and for new international students to acclimatise to Australian life.

The Australian Government **agrees in-principle** with this recommendation.

The Government works closely with states and territories through the Study Australia partnerships and regular meetings of the Commonwealth States and Territories International Education Stakeholder Forum to ensure a quality student experience for international students and enhanced community engagement. States and territories also celebrate the contribution that international students make to Australian society through annual international student award ceremonies. The Government notes the utility in confirming the roles and responsibilities of different levels of government.

The Government recognises the importance of a sustainable and representative student voice in policy development and implementation as well as within individual institutions.

Recommendation 9

The Committee recommends the Government use its convening power to encourage state and territory governments, local government authorities and universities to develop appropriate local accommodation models including home stay in their respective jurisdictions to help alleviate pressing student accommodation issues and deepen connections between international students and Australian society, highlighting the tax advantages for Australians who host up to two international students.

Best Practice Home Stay models should be informed by the Gold Coast Council's 'Host for Coast' program and developed in consultation with established reputable homestay organisations such as the Australian Homestay Network and international education peak bodies and include:

- formal eligibility review processes and ongoing quality assurance
- strong risk management focus in the lower end of the education provider market to prevent accommodation exploitation, and forms of worker exploitation such as rental debt bondage
- focus on home stay opportunities that support providers and communities in regional Australia
- a specific focus on home stay support for (domestic and international student) regional placements.

The Australian Government **notes** this recommendation.

The Government is working with state and territory, local governments and education providers to develop accommodation models to increase the provision of student accommodation, to ensure both domestic and international students have access to safe and secure housing.

Recommendation 10

The Committee recommends the Government urgently work to foster the expansion of the Purpose-Built Student Accommodation (PBSA) sector including:

- examining mechanisms to boost domestic and superannuation fund investment into PBSA (as the majority of capital invested at present is foreign) including support for a new asset class of PBSA, recognising that it is now a mature and specialist housing product
- engaging with state, territory and local governments to remove planning and development impediments to PBSA developments
- working with regional universities and considering incentives to support PBSA developments in regional Australia.

The Australian Government **agrees in-principle** with this recommendation.

The Government recognises the critical role of Purpose-Built Student Accommodation (PBSA) to alleviate accommodation shortages, particularly in the student market. There is a growing pipeline of additional PBSA, with more than 11,000 beds under construction, more than 15,000 with development approvals in place and over 12,000 in the planning process.

The Government has made clear to publicly funded universities that increasing the provision of safe and secure student accommodation for both domestic and international students, including through PBSA, is a priority. This priority is reflected in policy settings for a managed system of international education in Australia. In its settings for 2026, the Government established an application process for universities through which they can apply for an increase in their New Overseas Student Commencement (NOSC) allocation, with student accommodation as one of the key factors against which applications are assessed.

The Government will further consider this recommendation in line with other Government reforms, including the Housing Australia Future Fund, the measures from the National Housing Accord, the Australian Universities Accord Final Report, as well as guidance from the recently established National Housing Supply and Affordability Council.

Recommendation 11

The Committee recommends the Government review and consider the desirability of the widespread practice in the university sector whereby universities establish Central Business District (CBD) campuses largely comprising international students and sub-contract the teaching to private institutions. This could be considered as part of the University Accord process and may warrant adjustments to funding formulas to ensure genuine regional universities in particular are adequately funded and not forced in effect to chase revenue in this manner.

The Australian Government **notes** this recommendation.

The Government is committed to supporting regional universities, ensuring they are adequately funded and that the students receive a quality education.

The Government will further consider how to support regional universities to thrive in line with other Government reforms, including implementation of recommendations in the Australian Universities Accord Final Report with demand-driven Needs-based Funding for students studying at regional campuses commencing from 2026. Measures to guide the international education sector towards greater sustainability will continue through a managed growth approach, which is currently being implemented through changes to the prioritisation of resources for offshore student visa processing under a National Planning Level.

Where a provider delivers a course with a third party, the Higher Education Standards (HES) Framework requires higher education providers to remain responsible and accountable in all aspects of course delivery and support. TEQSA may apply a greater focus in ensuring compliance is effectively implemented by the higher education provider. TEQSA also expects students have equivalent opportunity to successfully transition into and through their course of study irrespective of educational background, mode, delivery arrangement or place of study.

Recommendation 12

The Committee recommends the Government significantly improve data sharing between agencies to address serious integrity concerns, including formal information and sharing agreements and platforms between the Department of Home Affairs, the Department of Education, Tertiary Education Quality and Standards Agency (TEQSA), Australian Skills Quality Authority (ASQA), and where appropriate, the Commonwealth Ombudsman, Austrade and the Department of Employment and Workplace Relations.

Government should form or utilise an existing cross agency expert group to oversee the development of these platforms to ensure:

- legislative basis and privacy considerations are appropriately addressed without preventing the effective sharing of information
- platforms are sufficiently resourced to rapidly identify and track high-risk behaviours by education providers, education agents and related third parties and have capacity to map such behaviours to international student movements and student visa data
- platforms can inform more effective and timely regulatory action to deter and disrupt international student exploitation and safeguard Australian international education and visa integrity.

The Australian Government **agrees** with this recommendation.

The Government is exploring further reforms around data expansion as outlined in Recommendations 12, 13, 18, 23, and 26, and notes the actions in this recommendation are being progressed.

The Government is committed to enhancing data sharing capability between regulatory agencies, in alignment with the Government’s response to the Nixon Review.

Broader data sharing detailed in this recommendation will be investigated over the longer term in line with the strategic priorities of Government and areas of responsibility for relevant agencies.

The Government regards agencies working together to share intelligence, identifying areas for regulatory action and treating shared risks in international education, as a critical component to ensuring integrity in the sector. Government has established a cross-agency committee consisting of ESOS agencies and Commonwealth departments, with a focus on information sharing on integrity risks to the sector.

Recommendation 13

The Committee recommends the Government use whatever means at its disposal to compel education providers to develop information channels across sectors to share credible information and concerns regarding education agents, entities and student movements to inform and support integrity in student recruitment and delivery of international education and to disrupt non-genuine students and other entities seeking to exploit the international education sector, the student visa system, and international students.

The Australian Government **agrees** with this recommendation.

The Government has positive working relationships with the sector and will continue to build conduits to share information related to risks to the integrity of Australia's international education system. The Government remains committed to ensuring the quality, integrity and sustainable growth of Australia’s international education sector and working with the sector to achieve this goal.

The ELA Act contains robust elements to increase information sharing on education agents to support providers to choose ethical, high performing agents. Integrity reforms in the Act complement the changes to the Student Visa Program through strengthening regulations for education providers and disrupting and deterring non-genuine education providers and students.

Recommendation 14

The Committee recommends the Government take firm action to address persistent and deep-seated integrity issues in the private Vocational Education and Training (VET) sector, understanding this will be a difficult and long-term reform program. Actions may require legislative changes to strengthen regulatory oversight and tough decisions and could include:

- structural reforms to improve the monitoring and assessment of current providers and increase vetting of new providers including a fit and proper person test to operate a VET provider
- a pause for at least 12 months by Australian Skills Quality Authority (ASQA) in processing new provider applications for Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) registered VET providers, with limited exceptions for legitimate applications such as industry linked entities, high economic value proposals or those endorsed by state and territory governments
- requiring new providers seeking CRICOS registration to have operated and delivered to domestic students for at least 12 months
- suspension of recruitment of international students to CRICOS VET courses identified with persistent quality and integrity issues and/or of limited value to Australia's critical skills needs, such as management and leadership courses.
- automatic suspension of new international student intake for providers under serious regulatory investigation
- cancellation of a provider's CRICOS registration if no training is delivered for a period of 12 months or more
- an ongoing boost to the resources available to ASQA for compliance and enforcement of VET regulatory and quality requirements over time.

The Australian Government **agrees in-principle** with this recommendation.

The Government is committed to ensuring integrity and quality in Australia's international and domestic VET sector. These issues are complex and require a coordinated approach across government agencies.

The ELA Bill passed by Parliament on 28 November 2025 included a range of integrity measures to strengthen the international education regulatory framework by amending the *Education Services for Overseas Students Act 2000 (the ESOS Act)*.

These measures directly address the recommendation, including by:

- strengthening the criteria for determining whether a provider is 'fit and proper' to include consideration of cross-ownership arrangements and any current investigation for specified offences;
- requiring VET providers, except for TAFEs, to first deliver courses to domestic students for two years before they can apply for registration to teach overseas students;

- automatically cancelling CRICOS registration of ‘dormant’ providers – that is, any provider that has not delivered any registered course to any overseas student at any onshore location for a period of 12 consecutive months;
- enabling the Minister for Education, with agreement of the Minister for Skills and Training for the VET sector, to pause the making or processing of CRICOS applications for new providers or courses for up to 12 months; and
- enabling the Minister for Education, with agreement of the Minister for Skills and Training for the VET sector, to suspend or cancel specified classes of CRICOS courses where:
 - there are or have been systemic issues in relation to the standard of delivery of the courses included in the class;
 - the courses provide limited value to Australia’s current, emerging and future skills and training needs and priorities;
 - it is in the public interest to do so.

In the 2023-24 Mid-Year Economic and Fiscal Outlook (MYEFO), the Government announced a package of \$37.8 million for measures to improve integrity in the VET system and protections for students. The measures have supported the national VET regulator, ASQA, to strengthen its regulatory activities by:

- establishing a new Integrity Unit within ASQA,
- upgrading ASQA’s digital and data systems to identify and respond to potentially illegal activity in the sector,
- establishing a confidential VET tip-off line for reports of serious non-compliance and illegal activity.

The Government has also taken swift action to strengthen the Fit and Proper Person Requirements under the *National Vocational Education and Training Regulator Act 2011* (NVETR Act). These changes provided ASQA with increased powers to scrutinise those who are in the business of managing or operating Registered Training Organisations (RTOs).

The Government is also lifting the quality and integrity of training within the VET sector through the release of revised Standards for Registered Training Organisations (RTOs) 2015 with 2025 Standards for Registered Training Organisations (2025 Standards). The 2025 Standards for RTOs came into effect on 1 July 2025 and strengthen the focus on quality outcomes for learners and employers, provide greater clarity around expectations, and allow for more flexibility and innovation in training delivery across the sector.

The Government made amendments to the NVETR Act in early 2024 to ensure ASQA has the necessary regulatory tools to take swift action to address integrity risks posed by non-genuine or unscrupulous RTOs and lift quality across the VET sector.

In the 2024-25 MYEFO, the Government committed \$7.7 million over four years from 2024–25 (and \$0.4 million per year ongoing) to enable ASQA to deliver additional integrity activities for Australia’s international vocational education and training sector, working closely with sector regulators.

Additionally, in the 2025-26 Budget, the government committed \$4.7 million in surge funding for ASQA. This funding will enable ASQA to immediately respond to fraud in the VET sector, particularly where providers are issuing fraudulent qualifications.

The Government is committed to ensuring Australia's VET system delivers world-class training while protecting students and quality providers. Government will continue to investigate further improvements to the regulatory framework and enhance quality requirements for VET delivery. Implementation of improvements would require careful consideration to ensure intended outcomes are achieved.

Recommendation 15

The Committee recommends the Government implement or at least trial major reforms to how international student learning is assessed, and education quality assured for high-risk Vocational Education and Training (VET) providers and courses by working with the States and Territories to consider the following options:

- developing a framework to assess all 932 Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) registered VET providers (excluding public Technical and Further Education providers (TAFEs)) to identify higher risk providers – the framework should be equitable and transparent, informed by both quantitative and qualitative information, though not all data sources and aspects may be public
- subjecting identified higher risk providers to stricter compliance and accreditation requirements which may include:
 - trialling external assessments of a random selection of students from high-risk providers / courses to accurately assess education training quality, identify systemic issues and provide Australian Skills Quality Authority (ASQA) with better evidence to respond with and cancel the registration of non-genuine poor-quality providers, more rapidly
 - a full re-accreditation process for providers identified as posing the highest integrity and quality risks where providers would have to reapply for their registration with ASQA
 - a mechanism to separate the training function from the assessment function in limited circumstances for high-risk providers and / or course, requiring students to be externally assessed by an independent body or by a provider approved (such as TAFEs or a proven high-quality private provider permitted to undertake external assessments).

All of the above initiatives would be provider funded on a cost-recovery basis.

The Australian Government **agrees in-principle** with this recommendation.

The Government is strongly committed to ensuring a high-quality vocational education and training (VET) sector with oversight by the national VET regulator, ASQA, delivering a risk-based approach to regulation.

ASQA manages the registration of all providers based on risk and has an ongoing risk focus on CRICOS providers. ASQA's measures to support greater integrity in the international education system, supported by a significant uplift in its digital and data systems continues to build ASQA's compliance, investigative and enforcement capabilities. The most effective approach is to engage with those providers on whether they meet the threshold for registration – at any stage in their registration cycle.

As outlined in Recommendation 14, Government is lifting the quality and integrity of training within the VET sector through the release of revised Standards for Registered Training Organisations (RTOs). The 2025 revised Standards for RTOs will strengthen the focus on quality outcomes for learners and employers, provide greater clarity around expectations, and allow for more flexibility and innovation in training delivery across the sector.

In line with a focus on quality outcomes, the 2025 Standards for RTOs support a more flexible approach to delivery and regulation and complement ASQA's risk-based approach. A significant and ongoing program of engagement has been undertaken to facilitate the transition to the 2025 Standards, including to build RTO understanding and capability for operating under the 2025 Standards. Commencing in October 2024, this program of engagement included the development of educative and supporting resources, policy guidance, and a significant program of face-to-face and virtual workshops conducted by ASQA with providers across the country.

The Government remains committed to managing the sector at sustainable levels, creating a better and fairer system, and addressing integrity issues in international education. Measures included in the ELA Act strengthen integrity and support quality in the sector.

Recommendation 16

The Committee recommends the Government consider differentiating visa applications for international students who choose to study at Technical and Further Education providers (TAFEs). Further considerations to support TAFEs should include:

- Disaggregating Vocational Education and Training (VET) immigration data so that TAFE applications are reported separately
- supporting the Department of Home Affairs to apply a risk regime that recognises TAFEs genuine commitment to providing a quality experience for international students, by providing TAFEs with the same benefits/recognition as universities under the Simplified Student Visa Framework (SSVF).

The Australian Government **notes** this recommendation.

The Government will further consider this recommendation, in line with its response to the Nixon Review, which advocates for several reforms to protect students from unscrupulous private VET providers.

Recommendation 17

The Committee recommends the Government review international education regulatory bodies to ensure the settings and frameworks empower proactive risk analysis, on-the-ground quality assurance practices and that individual complaints, especially complaints by students, are investigated within an efficient timeframe. The review should consider how:

- agencies could maintain a list of 'red flagged' individuals and entities subject to serious regulatory action or serious integrity concerns, increase the degree and scope of penalties, and regulators could be empowered to be able to investigate provider and education agent or equivalent relationships
- increase the capacity and resourcing of international regulatory bodies over time to enable the agencies to effectively conduct randomised provider checks including site visits and conduct scaled investigations into high-risk provider behaviour
- ensure resourcing is sufficient so that agencies are equipped and capably resourced to take full advantage of, and contribute to cross-agency intelligence data gathering, pursue individual student complaints/whistleblowing allegations, and be able to report annual monitoring and investigation KPIs to be set by Government.

The Australian Government **agrees** with this recommendation.

The Government notes that the actions responding to this recommendation are covered by its response to the Nixon Review. In its response, Government has undertaken significant uplifts of regulatory capacity.

In the 2023-24 MYEFO, the Government announced a package of \$37.8 million for measures to improve integrity in the VET system and protections for students. The measures have supported the national VET regulator, ASQA, to strengthen its regulatory activities by:

- establishing a new Integrity Unit within ASQA,
- upgrading ASQA's digital and data systems to identify and respond to potentially illegal activity in the sector,
- establishing a confidential VET tip-off line for reports of serious non-compliance and illegal activity.

The Government is continuing cross agency work to support ESOS agencies to share and integrate data holdings and to support ongoing development of evidence-based risk indicators to inform compliance actions by the education regulators.

Recommendation 18

The Committee recommends the Government amend Quality Indicators for Teaching and Learning (QILT) Surveys to include questions about education agents and equivalents that would provide more detailed information of the agent student interactions.

The Australian Government **agrees** with this recommendation.

The Government has worked with the QILT contractor to include questions about education agents and equivalents for the 2025 Student Experience Survey.

Recommendation 19

The Committee recommends the Government:

- review and improve protections for international students to safely report workplace exploitation, including reviewing the Assurance Protocol to ensure that students who report exploitation are protected from visa cancellation
- examine the scale and use of Australian Business Numbers (ABNs) by international students to ensure this is not being abused as a device by employers to exploit students
- consider a scheme of endorsement of ABN requests by international students that require oversight by their educational institution
- consider requiring employers to undertake a very light touch registration when they employ international students (or potentially any temporary migrant), for example a simple website registration, enabling the Fair Work Ombudsman to undertake more targeted enforcement and to fine businesses found to be employing unregistered workers.

The Australian Government **agrees in-principle** with this recommendation.

The Government has zero tolerance for exploitation of migrant workers, including international students.

In July 2024, the Government implemented a pilot to strengthen reporting protections for a range of temporary visa holders, including international students. This pilot was co-designed with a targeted group of unions and civil society organisations with expertise in workplace relations. The design recognised that without appropriate protections for both their current and any future visa, some temporary migrants have been too afraid to try to resolve workplace exploitation, or to support investigations or pursue litigation against dishonest employers. This is a key element of the package of reforms to address migrant worker exploitation announced by Government in June 2023, in line with commitments made at the 2022 Jobs and Skills Summit.

The Government has driven broader legislative reform to deter the misclassification of employees as independent contractors through its *Fair Work Legislation Amendment (Closing Loopholes No. 2) Act 2024*. The Act changes the defence to misrepresenting employment as an independent contractor arrangement (i.e. 'sham contracting') from a test of 'recklessness' to one of 'reasonableness'. The effect of this change is to impose a more objective test. This means that an employer's ignorance or unreasonable mistake will no longer allow them to make out the defence and avoid liability for sham contracting. The Act also substantially increases the maximum penalties for bodies corporate that are not small business employers that are found to have engaged in sham contracting in the *Fair Work Act 2009*.

For the purposes of examining the scale and use of ABNs, the Australian Business Registrar currently shares ABN non-public information with eligible government agencies. The Government will consider a scheme of endorsement of ABN requests by international students overseen by education institutions. The recommendation to have ABN requests to be overseen by educational institutions raises several policy and legal issues, including considering how such a scheme would fit with the existing ABN obligations, and whether it would achieve the desired outcome. The recommendation would also require policy and law change.

Consistent with the direction in the Migration Strategy and the development of a public register for employer sponsors in the temporary skilled program, Government will in future consider if this register can extend to businesses that employ other temporary migrants where workers are particularly susceptible to exploitation.

Recommendation 20

The Committee recommends cross government agencies and the sector intensify efforts in implementing a targeted communication strategy to educate:

- international students of their rights and obligations when studying in Australia
- providers and education agents of their obligations to international students studying in Australia
- employers and industries that are high employers of international students.

The Australian Government **agrees in-principle** with this recommendation.

The Study Australia website and social channels are official Australian Government sources of information and referral for international students, agents, parents, school counsellors and other stakeholders.

Study Australia channels aggregate and disseminate whole-of-government information to a global audience. Austrade works closely with Commonwealth agencies, as well as Australian state and territory study destination agencies, to ensure the provision of accurate and up-to-date information, including on rights and obligations, and relevant tools and directions to providers, students and other stakeholders. Austrade also actively engages with global education agents via the Study Australia Agent Hub, a dedicated resource for education agents.

Education providers are required under the ESOS Act and the National Code of Practice for Providers of Education and Training to Overseas Students 2018 to provide information on student rights and responsibilities, as learners and as employees in Australia. The Department of Home Affairs, as the responsible agency, disseminates information relating to student's visas and conditions for employment, while the Fair Work Ombudsman offers free advice and education, including a range of in-language resources, to all employees and employers.

Collectively, these whole-of-government activities provide current and prospective students with information about their protections and rights under the Education Services for Overseas Students Framework, assist education providers and their contracted agents to understand their responsibilities, and educate employers and industry on the benefits and processes associated with engaging international students and graduates.

Greater cross-government collaboration will be developed and delivered in the context of the International Education and Skills Strategic Framework, once finalised. Implementation will include additional targeted communication strategies to better inform and educate providers on their obligations, under both the National Code of Practice for Providers of Education and Training to Overseas Students 2018 and 2025 Standards for RTOs, along with further efforts to educate international students, education agents, and employers.

Recommendation 21

The Committee recommends the Government:

- better enforce the current rules prohibiting transfers within the first six months of commencement of a student's primary course
- if resources prohibit this from being enforced in all instances, at least take a risk-based approach and enforce where there is evidence of patterns of transfers linked to certain providers or agents
- consider adjustments to the student visa system so that visa risk follows the student, shifting to the receiving providers when students transfer onshore to other providers.

The Australian Government **agrees** with this recommendation.

The Government has removed the concurrent study functionality from the Provider Registration and International Student Management System (PRISMS), in line with Standard 7 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018 which restricts student transfers in the first 6 months of their primary course of study.

The government announced its intention to introduce new legislation to ban agent commissions for onshore transfers in October 2023 and remains committed to implementing this measure. The ban seeks to disrupt unscrupulous agents from facilitating non-genuine student transfers, including in the first 6 months of study.

The Department of Home Affairs will work with the Department of Education to identify and inform policy changes and risk settings for students changing education providers. Government will consider student wellbeing to ensure that students with legitimate reasons for requesting a transfer within the first 6 months of study are not disadvantaged.

The Government will further consider regulatory enforcement in line with this recommendation, including how non-compliance would be identified and enforced.

Recommendation 22

The Committee recommends the Government amend Education Services and Overseas Students regulations to provide that any medical letter or certification for consideration of early release can only be issued by a medical professional who is approved under the students' Overseas Student Health Cover.

The Australian Government **agrees in-principle** with this recommendation.

The Government will consider this recommendation in the context of work underway to increase integrity in Australia's international education sector.

Recommendation 23

The Committee recommends the Government tighten regulations to:

- require providers to record the details of all education agents or equivalent that they receive students from into Provider Registration and International Student Management System (PRISMS) Agents Dashboard
- require providers to have written agreements with all education agents or equivalent
- require providers to actively monitor agent conduct including annually reviewed key risk indicators
- enable mandatory requirements to report misconduct involving suspected trafficking to the relevant regulatory authorities.

The Australian Government **agrees in-principle** with this recommendation.

The Government supports increasing the transparency of education agent data to providers. The collection of information on education agent commissions will enable Government to share more information with providers on the education agents they engage. These changes are outlined in measures under the ELA Act passed by Parliament in November 2025, supported by complementary changes to the *Education Services for Overseas Students Regulations 2019*. The Government also supports increasing requirements for providers to actively monitor education agents including requiring providers to have written agreements with the agents from when they receive international students and will consider these measures in more detail in consultation with the sector.

The Government notes the part of the recommendation to implement mandatory requirements to report misconduct involving suspected trafficking and will consider this in the context of the work underway, in line with its response to the Nixon Review and commitments detailed in the Migration Strategy.

Recommendation 24

The Committee recommends the Government in consultation with the education sector and agent peak bodies develop model clauses for providers to use in their written agreements with education agents to improve integrity, consumer protection and enable more transparency of payments.

The Australian Government **agrees** with this recommendation.

The Government will consider how implementation of the recommendation on model clauses could align with its broader reform work on the Education Services for Overseas Students Framework.

Recommendation 25

The Committee recommends the Government use whatever regulatory levers necessary to mandate certain minimum requirements be included in all written agreements between providers and students to increase transparency and consumer protection including:

- standard refund conditions
- mandatory disclosure of agent commissions and all other payments to the agent, their employees or family, and all related entities (to avoid rorts and workaround payments that are not characterised as 'commissions') that are charged to the student.

The Australian Government **agrees** with this recommendation.

The Government recognises the importance of embedding transparency and consumer protection in written agreements between providers and students.

The Government will work with the sector to consider requirements to be included.

Recommendation 26

The Committee recommends an expansion of the current Education Agents Dashboard on Provider Registration and International Student Management System (PRISMS) to allow provider access to all education agents' information. Such an expansion should enable providers to consider an agent's performance before entering contractual arrangements and to be able to compare agent performance or integrity concerns about individual agents across the sector.

The Australian Government **agrees** with this recommendation.

Improving providers' access to education agent performance data will assist providers in choosing quality education agents to support their student recruitment activities.

The Department of Education has already made enhancements to PRISMS that align with this recommendation. In July 2024, the Department of Education expanded functions in PRISMS, allowing education providers to search for any education agent and view information related to the education agent, including the other education providers they work with as well as the incompleteness rates and visa refusal rates associated with that education agent.

As noted in the response to Recommendations 13 and 23, measures under the ELA Act give providers greater access to the performance data of all education agents, not just those agents with whom they have agreements. Improving providers' access to education agent performance data will assist providers in choosing quality education agents to support their student recruitment activities.

Recommendation 27

The Committee recommends, in implementing the decision to ban the payment of commissions by providers to education agents, migration agents or equivalent entities for all onshore international student transfers, the Government ensure this captures 'marketing' or equivalent payments to related entities and persons however they are characterised.

The Australian Government **agrees** with this recommendation.

As noted in recommendation 21, the Government is committed to implementing the ban on agent commissions for onshore transfers and will ensure that all relevant persons, entities and payment types are captured by the change.

The ELA Act includes a new definition of 'education agent' in the ESOS Act as well as complementary changes to the *Education Services for Overseas Students Regulations 2019*. These provide an activity-based approach to persons or entities considered to be education agents, in order to capture persons or entities who may not have formal agreements or relationships to providers.

Similarly, the new definition of 'education agent commission' includes both monetary and non-monetary considerations or benefits given by a provider to an education agent or associate in connection with the recruitment of overseas students or any other activity involved in being an education agent under the new definition.

These changes ensure that, in implementing the banning of agent commission payments for onshore transfers, all relevant persons, entities and payments are captured.

Recommendation 28

The Committee recommends the Government accept that regulation of education agents is essential and long overdue, and that a model must be determined and implemented. Government should consider the most effective way of ensuring scrutiny of education agents given their key role in providing temporary migration advice and dealing with often vulnerable consumers. Any model will need to ensure compliance with a single Code of Ethical Practice for Education Agents setting expected standards for all education agents who work with Australian education providers. Any scheme should be industry funded through cost recovery mechanisms and have adequate resourcing for compliance and enforcement.

The Australian Government **agrees in-principle** with this recommendation.

The Government is currently undertaking work to bring effect to this recommendation in line with previous recommendations from the Nixon Review and the Migration Strategy, and may consider further measures should this be required.

The Government recognises the importance of ensuring Australian immigration advice is provided by lawful providers of immigration assistance.

Recommendation 29

The Committee recommends the Department of Education and the Department of Employment and Workplace Relations are each empowered to take a lead approach as policy owners for International Education with respect to their relevant policy portfolios. The Minister for Education and the Minister for Skills and Training, and relevant departments, should ensure the ongoing coordination of policy development and implementation. The Departments should also ensure that appropriate and holistic measures are included in their annual performance statements.

The Australian Government **agrees** with this recommendation.

The Department of Education, the Department of Employment and Workplace Relations, and other relevant agencies continue to build strong working relationships to coordinate policy development and implementation with meetings at the working and executive level. The departments also work closely with the sector to ensure providers comply with the requirements of the ESOS Act.

The Council for International Education which includes as its members the Minister for Education, the Minister for Trade and Tourism, the Minister for Skills and Training, the Minister for Home Affairs and Minister for Immigration and Citizenship, the Assistant Minister for International Education and the Assistant Minister for Foreign Affairs, provides the framework to ensure whole-of- government strategic thinking, informed by input from the Expert Members of the Council.