

Griffith University

Objective 1

1. Are there further reforms governments should consider that will improve the quality and integrity of the sector?

Griffith University supports improving both the quality and integrity of the broader international education sector, and notes there is already a high degree of compliance activity undertaken by universities and auditing of international recruitment activities and operations. Clear, consistent and effectively communicated policy and requirements will all be critical to Australia's reputation as a quality provider of international education. Recent significant changes have created a high degree of uncertainty within the sector, but also in the minds of prospective students and recruitment partners globally. With a regulatory framework and relevant legislation already in place, there is much that could be leveraged to manage quality and compliance issues that have arisen in recent years.

With respect to public institutions (universities and TAFEs) it would be preferable to rely on these existing mechanisms and good faith discussions rather than include these institutions in overly broad legislation that has the potential to undermine the regulated, quality element of the international education sector. It will be important that providers and sub-sectors delivering a high quality international student experience and recruiting students in a sustainable and ethical manner are not caught up in the reaction to significant growth in private RTOs set up to capitalise on Australia's hard earned reputation as a key study destination (noting that private RTOs now account for 11% more commencements each year than universities.) With 1400+ CRICOS registered providers, there is scope to use compliance records, and those currently under investigation or that have had conditions imposed by the regulator, as a primary indicator of where a reduction in international student numbers could be achieved. Similarly, AQF course levels could be used as a guide to allocating numbers. A relatively simple formula based on one of the 'lost' recommendations of the Knight Review (p.vii and Chpt5.) should be adopted.

The focus on onshore student transfers is welcomed and further consideration of increasing the 6 month restriction on transferring to 12 months is recommended. This would ensure students make decisions when they have had a chance to develop social networks and understand the academic system, leaving less chance of vulnerability to incentives offered by unethical providers and recruitment activities. This change would strongly signal to prospective applicants our focus on student genuineness at the time of application. Requiring a student to apply for a new student visa before enrolling at a new provider would act as a deterrent to both non-genuine students and disreputable actors in the sector. There would be the additional benefit of ensuring the risk associated with that student visa was the responsibility of the new provider, rather than staying with the original recruiting institution.

The focus of student visa processing should be the genuineness of the individual student and, should enrolment limits be introduced, the need for reform of the current SSVF is heightened. Direction 107 should be removed should the Bill pass, together with the provider risk framework. With formal caps in place, there is no need to use informal mechanisms and visa refusals to reduce numbers and reject genuine students based on the provider they want to study with. Caps, together with other recent ESOS-related moves, render much of the current visa priority processing legislation pointless and will impact providers' ability to use the full capacity of their allocated cap as it distorts the market due to students choosing providers based on a visa priority basis rather than the institution best suited to them. The current duplication of visa assessment at the provider level and then by DHA has created a resource intensive system using resources that should be put towards the provision of support services to international students.

The draft Framework calls for strong partnerships with employers and industries to create more internship and job opportunities for international students but Student Visa 8105 condition limits the capacity for students to undertake non-mandatory work integrated learning opportunities as part of their academic program. This restriction should be removed to allow international students to engage equitably with WIL opportunities. Enhancing international students' ability to develop their employability skills as well as opening up further opportunities for them to engage with local communities will benefit all involved.

Finally, the proposed definition of 'agent' is so broad it potentially includes government staff who promote Australian education offshore, through to staff in overseas partner institutions with which we offer joint programs as well as service providers. A clearer and more specific definition, if not the current one, should be adopted.

2. What more can providers do to improve the integrity of the international education sector?

Universities such as Griffith already invest significant resourcing in assessing student genuineness according to DHA requirements, in addition to the core work of assessing the ability of applicants to undertake study in our institutions and meet their academic goals, based on their academic background and level of English language proficiency. Recruitment-related resources at Griffith are allocated in a way that supports the recruitment of a diverse international student cohort, both in terms of citizenship and program of study. This contributes to enhanced interaction with domestic students, providing them with the chance to build their own international network and expand their understanding of the world.

Ongoing investment in a comprehensive network of student support services and the provision of opportunities for students to engage both across the University and in the wider community ensure our international students have the best chance of success in their studies while developing their understanding of Australia, its culture, lifestyle and values.

A commitment to diversification currently brings with it some level of risk, especially in the development of new and emerging markets, with advice from some parts of the government conflicting with that of another (e.g. Austrade may encourage and support the opening of diverse markets but the DHA takes a highly risk averse approach to assessing applicants from those markets.) It would be good to see a more consistent approach to market development and support for providers that are genuinely committed to diversification on their campuses, both in terms of how provider risk is assessed (if at all) as well as the provision of quality market research and information to support well-informed market entry strategies. Any limitation imposed on enrolment should support quality providers with a history of diversification to recruit the students that will thrive both at that institution as well as in the community within which it is hosted.

While the importance of accessible and appropriate accommodation is recognised, there are also other options and partnerships that education providers should be encouraged to develop and maintain, recognising both the timeline involved in the construction of new PBSA, the limitations on where PBSA investments can be made and, most importantly, that PBSA will not always be the optimal choice if we are to focus on recruiting a diverse student cohort in terms of background and aspirations, as well as citizenship (see further below).

Providers should be held accountable for a failure to act with integrity or provide a quality academic experience, but the current approach to categorising markets in terms of risk does not differentiate by the academic quality of the students recruited by different parts of the sector, nor support providers in developing new and emerging markets. Recent changes that support increased data sharing regarding recruitment agents are welcomed as they enable providers with additional information with which to assess new agent contracts as well as in the management of existing agents.

Objective 2

1. What factors should inform government's approach to allocating international student enrolments across sectors, providers, and locations in Australia?

Griffith University supports students right to choose the education provider that best enables them to achieve their academic goals and aspirations for studying in Australia. Given the overwhelming majority return home on completion of their program, there is limited basis for considering them as migrants.

However, should limitations on enrolment eventuate, the focus should be on reducing the numbers in low quality providers that offer courses of no benefit to Australia nor the students themselves. CRICOS caps already enable the management of the number of students recruited in individual education providers and it is noteworthy that much of the recent growth in CRICOS registrations has been at the lower end of the quality scale. Conversely, international tuition fee revenue generated in the university system supports Australia's research capacity as well as enabling institutions to offer academic programs to domestic students that may otherwise not be viable.

Imposing limits on certain cities will not see students choosing less popular destinations in Australia, with most applicants considering universities in two or more countries. If city limits are to be applied, they should not apply to Brisbane. As host to just 10% of international student visa holders in 2023, across several universities that are geographically spread across the city and making up less than 4% of the city's population, Brisbane is not subject to the same issues as Melbourne and Sydney. In 2021, the Brisbane LGA did not appear in the list of top 20 locations by share of temporary visa holders in the rental market.

Consumer choice is an important underlying principle of the ESOS Act and the suggestion that government intervention can shift student demand to different providers and regional areas of Australia is unrealistic and contrary to that principle. International students have access to a wide range of institutions and destinations beyond Australia, and retention rates are highest when there is accurate advice and a good match between what a student is seeking, and a provider and host community offers. Australia's reputation risks long-term damage if international students' choices are restricted or they are seen as a commodity that can be managed at will. That being said, if the government were to substantially reduce international students coming to Australian universities, it would be sensible to ensure that the limited visas available were distributed in a many that disperses the benefits of such visas across Australian States and regions.

Australian universities offer quality education experiences in a well-regulated environment, and are sought after by students from a range of backgrounds. While two markets have dominated recruitment numbers, that is in part due to the sheer scale and demographic profile of both countries (in which over a third of the world's population live), and a change in demand is already evident from China. Many universities have invested in the diversification of both the source of students and the programs they enrol in, but financial capacity and academic background combine with patterns of demand to determine the nature of the student cohort. The imposition of limits at the course level would be both difficult to manage given visa grants and other factors that determine actual commencement dates as well as creating market uncertainty that would see Australia lose out on quality, genuine students. Given the overwhelming majority of international students return home, it also makes no sense to give the Minister this power with respect to universities. It may be more defensible to ensure that lower-level providers are not established to train students in areas where there is little domestic demand.

The proposed ESOS changes give the Minister - current and future - an inappropriate level of authority and send a signal of political intervention at a level that would be considered a warning flag under our own Foreign Relations Act when dealing with a prospective overseas partner institution. International education in Australia is already one of the most highly regulated sectors in the world and the handing of power to determine not only the size but also the composition of the international student cohort in every individual education provider and in every academic program to one Minister poses considerable risk and would adversely impact many of our long term international partnerships. For universities, there is the opportunity to have more sophisticated conversations regarding their international student cohort and

recruitment activity as part of the compacts that will be managed by ATEC, which can then be considered alongside the strategic mission and objectives of the individual university, as well as the needs of the communities it serves.

2. What considerations for government should inform the overall level of international students in Australia?

The most important consideration is economic impact to Australia from potential damage in the short and long term to an industry that contributed \$47.8 billion to the Australian economy in 2023, accounting for more than half of Australia's growth. \$31.7 billion of this was contributed by the Higher Education sector. International education was the fourth largest export industry, surpassed only by mining exports.

The Universities Accord report acknowledged the broader value international students offer, highlighting that the Migration Strategy recognises that international students play an invaluable part in Australian communities, bringing new ideas and skills. The social, economic and cultural value of the work undertaken by universities is vital to Australia's global reputation, development of a knowledge economy, and our sovereign capability. With limited government funding, universities are highly reliant on the income generated through international education to support teaching, research and infrastructure. Our universities are key to the innovation agenda, as articulated in Australia 2030 – Prosperity through innovation. International fee revenue is fundamental to public sector research and development, basic and applied research.

Australia's university sector is relatively small but has produced exceptional results. In 2023 global university rankings, Australia was the 10th most represented higher education system in the world out of more than 100. With just 0.3% of the world's population, Australia produces about 3% of the world's research. Ranking agencies have been warning for some years of the risk of Australia's universities losing ground in global rankings due to decreasing government funding, and this proposal to potentially cap international student numbers would accelerate that rapidly, eroding a hard-won reputation for excellent research outcomes, high levels of international research collaboration, and excellence in the provision of education for international students. As Australia seeks to strengthen our relationships and profile in the Asia-Pacific region, we risk becoming a less attractive option for collaboration.

'The proposed cap to the number of international students will be detrimental to the standing of Australian universities and it will further accelerate the rise of Asian universities. The cap also threatens the viability of Australian universities, erodes Australia's educational quality and knowledge production capacity, and runs contrary to addressing skills shortages.' (Angel Calderon, QS rankings article, Future campus 5/6/24)

Australia's universities have educated many international government and business leaders, particularly from our region, and there is a strong global network of alumni. At home, international students and graduates offer an opportunity for Australia to meet its skills needs, including in critical skills areas, although this should not be the sole driver for hosting international students or for determining course offerings or post-study work rights.

A reduction in international student numbers will adversely impact the visitor economy, at a time when, through the THRIVE 2030 Strategy, there is a goal of growing Australia's visitor economy to \$230 billion by 2030 from an anticipated return to \$166 billion in 2024. In 2019, international students were responsible for visitor expenditure of \$40 billion, with VFR contributing another \$4 billion, together accounting for 75% of international visitor expenditure. International students not only contribute a high proportion of visitor economy spending, they are also highly represented in part-time work that services the visitor economy; 2021 census data indicated that 58.3% of the temporary resident workforce in tourism related industries were student visa holders. This is particularly important for key tourism destinations such as the

Gold Coast, where Griffith has its largest campus. International students also play a critical part in the care economy, which is already plagued by staffing shortages.

At the operational level, any enrolment limits will need to be easy to implement and communicate, including a mutual understanding of what is an international student 'enrolment' – headcount, visa holder or equivalent full-time load?

3. How will this approach to managing the system affect individual providers?

'Setting international student caps is in fundamental conflict with principles of student choice and university autonomy.' (Andrew Norton, 20 May 2024)

We value our international student community for the way they enrich our classrooms, our research efforts and our communities, but the most significant impact on Griffith of the proposed approach is financial. In 2019, the international student fee margin for Griffith University, once cost of teaching is taken into account, was 36% of fee income, or \$59.7 million. This contributed directly to funding teaching, research and capital development. Any reduction in international enrolments would impact our capacity to support successful outcomes for all of our students and meets our domestic access and equity goals, research to address significant challenges which will impact both local and global populations, and our ability to serve our local communities. The economy and social fabric of our host communities would also be affected - in 2019, international students, both short term and long term, contributed over \$13 billion to the Gold Coast tourism economy, with an average tourism spend of \$22,000+ each.

International education in Australia is estimated to support 250,000 jobs. At Griffith University, that includes academic and professional staff. Changes in migration settings and DHA processing priorities and outcomes as well as market responses to the volatile policy environment are already driving a decline in demand, and putting jobs at risk.

Our capacity to provide a comprehensive range of study offerings that support the domestic student body and the development of an educated and skilled workforce, undertake vital research that addresses the needs of both our local community and the world more broadly, and support economic development and social wellbeing for our local communities would all be adversely impacted. We have invested significantly in world leading international student engagement programs and support services for our international students and in developing strong partnerships with institutions and governments around the world, including for research. Likewise, hosting international students enables us to provide internationalisation experiences to Australian students, both within the classroom, on campus and around the world.

A reduction in international student numbers and consequent decreased investment in research will result in poorer performance in global rankings, which are already affected by sustained high levels of overseas government investment in higher education, especially in the Asia Pacific. Placement in these rankings enhances an institution's reputation and enables us to develop collaborations and funding partnerships with overseas partners and governments, a virtuous cycle that enables even greater collaborative output.

We strongly oppose caps at course level. We know from experience with a small number of quota-bound programs, particularly in professional health programs, that managing course-specific limits is exceedingly time consuming and resource intensive, as well as fraught with the possibility of inequitable decision making. For example, differing educational systems around the world and their correlation or lack thereof with the Australian study calendar means there may be an over-representation of students from some countries being in a position to apply for and accept offers to study before other, equally genuine and eligible students. Such practices undermine diversification and are inequitable. Course-level caps would also require extensive systems changes, which are complex, expensive and take time to implement. The difficulties with managing numbers within an institutional cap and the many factors that influence student decision-making, including visa application outcomes, would be significantly exacerbated by course-level caps.

4. Should sectors other than higher education and vocational education and training, such as schools, ELICOS and non-award be included in approaches to manage the system for sustainable growth?

If the Government elects to proceed with provider enrolment caps, Griffith University advocates for the exclusion of international student enrolments in schools, ELICOS, non-award programs (including Exchange and Study Abroad), and Higher Degree Research

5. How should government determine which courses are best aligned to Australia's skills needs?

Aligning course offerings with skills needs undermines the autonomy of universities and their ability to innovate and meet the broad needs of students, industry and society over time. It also relies on the false assumption that all international students intend to remain in Australia post-study, (when over 80% of students return home or to a third country) whilst limiting student choice and ignoring our role in developing the capacity of neighbouring countries. While our higher education system has a key role to play in preparing students for future careers, we cannot ignore the value of a diverse portfolio of study disciplines and courses that prepare students not only for their graduate career but for changes of career over time and for being able to make a broad contribution to workplaces and society.

Australian universities all commit to graduate attributes such as independent thought, critical thinking, strong communication skills, collaboration, entrepreneurship, and awareness of social and environmental issues. We continue to develop strong links with industry that provide our students with opportunities for work integrated learning that supports career readiness and enhances their value to future employers. It is these learning experiences and skills development that attract international students, as they seek opportunities that are less accessible in their own education systems.

Constraining international enrolments by focusing on Australia's skills gaps fails to recognise the world-leading expertise many universities have built in specific disciplines which make that provider and program a much sought-after program by students in other countries. In some cases, these disciplines may not align with identified skills needs within Australia and attract fewer domestic students. A diminished ability to attract international students will compromise the furtherance of academic expertise and research in these disciplines.

The Universities Accord Report recognised the opportunity for international students to "alleviate national skills shortages, making an ongoing contribution to Australia's communities and ways of life." For those students who seek an opportunity to undertake post-study work or to potentially migrate to Australia, there is benefit in being explicit regarding courses that will best enable this. However, this can also work counter to diversification strategies – by nationality and course – and risks failing to meet changing skills needs into the future, both in Australia and in the home countries of international students.

While it may seem expeditious to consider the opportunity presented by international students to fill particular skills gaps at different points in time, the reality is that this can be extremely challenging. Recognising the current and future needs of the health sector for nurses, universities offering nursing courses already work closely with state health systems and AHPRA to enrol and support international students. However, the provision of required placements for nursing students is a challenging and expensive exercise that necessarily limits student numbers, and most universities already fill their international quotas in these programs. By contrast, teacher education meets state-based registration requirements and has not generally been attractive or accessible to international students as a result of visa and immigration settings. In addition, international teacher education graduates from non-English speaking backgrounds tend to be less competitive for post-study employment and are likely to face particular challenges in regional schools and communities where there are limited diaspora populations for cultural support.

However, international students could be key to addressing the issue at the heart of the Government's current concerns, that of housing supply. We produce many international graduates who are engineers,

architects, construction managers, quantity surveyors, and project managers, who could help Australia to address its housing and infrastructure needs.

Before they even graduate, many international students contribute to Australia's skills needs, with part-time employment in areas such as hospitality, healthcare and cleaning that are less attractive to Australians.

6. How should government implement a link between the number of international students and an increased supply of student housing?

Access to appropriate and affordable accommodation is an important component of an international student's experience. International students are not immune to the increased rental prices and shortage of suitable housing that has impacted many Australians in recent years. However, their accommodation needs are different to those of the average Australian, as evidenced by the Property Council of Australia's (April 2024) report showing international students make up only 4% of the Australia's private rental market. Capping international student enrolments will not resolve Australia's housing crisis.

Of the various providers recruiting international students, universities are the most invested in the provision of student housing but the draft Framework fails to recognise this. Rather, it places responsibility for student accommodation solely on universities, ignoring the fact that 32% of international student visa holders in 2024 are enrolled in VET, for example. Depending on the domestic:international student ratio, and the characteristics of the domestic student cohort, some universities have a long history of providing on-campus accommodation, while for others there is less demand and a less viable financial case.

Purpose-built student accommodation (PBSA) is one important model and more than 76,000 beds are available through private PBSAs in Australia with almost 8,000 more due to become available in 2026, as the result of significant investment in the development of such properties, often in collaboration with universities. If PBSA stock is to be increased, local governments need to provide the settings and incentives to drive investment, and the timeframes involved need to be acknowledged. A major PBSA provider in Australia indicated that the time period between inception of a PBSA project and delivery of final product is a minimum of seven years, so providing additional student accommodation is not something that can easily be addressed nor linked to the lifting of enrolment 'caps' at the individual provider level. Importantly, the government's current stated intent to limit international student numbers and ever changing student visa settings are already impacting PBSA investor appetite to further develop provision in Australia. Imposing international student caps is antithetical to encouraging further investment in student accommodation to meet the needs of both international and domestic students (this is feedback we are already receiving from PBSAs who are seeing diminished interest in Australia from investors), while the reduction in international fee revenue will mean universities will not be in a position to lead or contribute to the development of PBSA or their own accommodation.

While PBSA will be the right choice for some students, it is not necessarily the preferred model for many international students for myriad reasons. These may include cultural norms oriented towards communal living, the location and impact of location on the overall student experience, accompanying family members, community diaspora, duration of time in Australia, and budget constraints. For example, an Australia Awards Scholar studying a degree in Australia fully funded by DFAT receives an annual living stipend of \$34,500. If such a student were to live in standard PBSA housing, they would spend 2/3 of their stipend on accommodation which is neither feasible nor encouraged. PBSA, with the inclusion of all amenities, may be an ideal option for some students, but many are better served by other options, such as private rentals or homestay, that offer a more sustainable option and enable greater immersion with local communities, allow for family members to accompany the student, and can be more cost-effective. In addition, a substantial part of the economic benefit to the community of international students is that provided to residents who host them in their homes or rental properties, and this is an important component of maintaining social license for international education as an activity that offers significant benefit to all of Australia and not just the education providers that collect their fees.

7. What transition arrangements would support the implementation of a new approach?

The international student recruitment cycle varies markedly from the domestic student recruitment cycle, and the time between enquiry and enrolment for a university international student is typically at least 18-24 months. This can be longer if language and/or academic pathways are required, or they are involved in a jointly delivered program with the first two or three years delivered offshore. Thus, there are already many students in formal pathway and joint programs, as well as direct entry students holding offers or having accepted a place for 2025. The imposition of international student commencement caps from 1 January 2025 may place institutions in provider default if the number of commencing students already committed to exceeds any caps applied, and this would be further complicated should caps be imposed at the course level. Any reduction in student numbers from 1 January 2025 would require significant recalibration of all elements of the recruitment, application and enrolment processes, and may involve high numbers of revocation of offer and acceptances already received, placing us at risk of provider default under the ESOS Act. Beyond managing student enrolments, a reduction at relatively short notice in international student numbers may impact the viability of delivering some academic programs and research activities, affecting domestic students and staffing requirements, as well as international students.

Given the establishment of ATEC and the significant role that international students and the revenue they generate plays in universities' ability to undertake a range of mission-related activities, and the complex metrics on which any enrolment limits might be based (e.g domestic:international student ratio, capacity of provider and host community to provide an outstanding student experience, economic impact on the broader community, skills gaps and future workforce needs), it is important that adequate time is given to developing and communicating to all stakeholders the implications of any limits. For providers, there will be a need to ensure they are recruiting and admitting students in a way that ensures they do not inadvertently breach any 'cap', while for prospective students and partners, there will be the need for clear communication as to the chances of getting the place they are seeking, visa implications and so on. Depending on the exemptions put in place, as noted above there may well be a large number of students and partners to whom commitments have already been made and they are enrolled in offshore programs with the intent of transferring onshore.

For those reasons, it is recommended that 2025 is seen as a year of transition, ensuring that any limits on enrolments are negotiated in a thoughtful and nuanced way. The alternative risks damaging Australia's reputation in what is an increasingly competitive market for global talent, with new study destinations and changing demand patterns already affecting the size and shape of the market interested in studying in Australia. Shorter courses in many private providers may not have the same extensive lead time and could be considered separately.

Objective 3

1. What are the barriers to growth in offshore and transnational delivery of Australian education and training?

The primary barrier in relation to growth in offshore and transnational delivery of Australian higher education is the cost and the relatively low return on investment compared with hosting international students onshore. The costs of developing, implementing and sustaining TNE offerings are substantial, with challenging up front investment requirements and time required to achieve break-even point, i.e. it requires deep pockets for an uncertain return in an increasingly fiscally challenging environment. In addition to the financial costs, there are challenges in determining market demand as, for providers that have established a brand presence and reputation for delivery in Australia, offshore delivery means very different competitors, student and academic experience. The regulatory framework and tax and legal environments within which the TNE offering will be delivered is also more complex, and has often been

relatively volatile. At a time when onshore international tuition fee revenue is under threat, many universities will not be in a financial position to invest further in the development of TNE programs.

Australia has a globally recognised higher education quality assurance system and applies the same level of scrutiny and regulatory rigour to TNE activities as it does to activities carried out in Australia. This protects the reputation of our education system, but carries associated cost and challenges when providers are operating in very different environments. Our ongoing quest to ensure a diverse international student community that benefits all students, staff and community, cannot be matched in TNE activities which are often, by their nature, attracting only one, or a small number of student nationalities. The goals and objectives that underpin the establishment of TNE are inherently different to those that determine the offering of programs onshore.

While offshore branch campuses are the more visible form of TNE, many Australian universities have successfully established partnerships with international universities and private providers that have delivered programs taught jointly and comprising both an in-country and onshore component e.g 2+2, 3+1. The long history of many of these programs and the partnerships that have supported them need to be taken into consideration when determining exclusions to any limits on international enrolments, as will providers need to review the financial costs of supporting them.

In recognition though of changing demand patterns and the large number of university-age students for whom traveling to Australia to study is not an option but that seek an international education, Griffith is a member of an IRU consortium exploring the development of a campus in India. The support of both the local and Australian governments is critical in such developments, including both the Department of Education and Austrade. Practical support through the provision of high quality market research regarding the demand side, as well as tax, legal and regulatory advice as well as an understanding of the geopolitical relationship between the two countries and any likely changes in higher education policy settings are all required, and the lack of such support or high cost are often barriers that prevent individual universities progressing plans further. This is an area where more assistance could be provided if the government wants to see further TNE investment. Government should be very clear, however, as to what benefit it seeks to obtain through offshore provision of teaching as many of the benefits that onshore teaching brings (clearer financial returns for universities, tourism dollars, participation in the workforce while studying, impact on Australia's economic growth) are not present in wholly offshore teaching.

2. Where can government direct effort to support transnational education?

Traditionally, Australian TNE efforts have been entirely driven by individual institutions, particularly in higher education and the public university sector. Efforts have thus been fractured and highly individualised, missing the opportunity for a cohesive Australian presence. If the Government is serious about supporting TNE, it will provide funding support and high level legal, regulatory and viability advice that will enable all institutions to consider TNE opportunities and have access to the required information to engage in them judiciously. Given the variation in university missions, and compacts that will be negotiated with ATEC, as well as differing financial capacity and risk appetite, TNE delivery will not be uniformly adopted. It should not be seen as a magic bullet, providing funding to the sector while limiting the international student numbers in Australia.

As noted previously, there are many forms of TNE and a clearer understanding of those different forms needs to be developed and shared between providers and the relevant parts of government. Further clarification as to whether students transferring onshore as part of joint programs or coming through a pathway from qualifications delivered offshore are included or excluded in any limitations on international enrolments is also required so that a comprehensive evaluation of the financial model as well as the risks and benefits can be undertaken.

TNE is not a cheap nor short term undertaking. With already constrained financial resources, there is likely to be a contraction rather than expansion in many public universities' investment in TNE offerings if their capacity to earn revenue from international students is further limited.