



The University of Queensland's response to the *Draft Australia's International Education and Skills Strategic Framework*

Objective 1: A sector built on quality and integrity

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

Australia's higher education sector is built on a foundation of quality and integrity and, as outlined in *Australia's International Education and Skills Strategic Framework: Draft for Consultation*, there is already 'rigorous protection for international students through a robust legislative framework'. The University of Queensland (UQ) agrees that non-genuine students and a small number of unscrupulous providers have eroded public confidence in international education. As noted in the [Review of the Migration System](#), quality and integrity issues are primarily concentrated in the private VET market – rather than in higher education – where course costs are relatively low and there has been rapid growth in the number of small providers. In the last three years alone, 215 new private RTOs have been registered (see [CRICOS data](#)).

For this reason, UQ is supportive of recent reforms including the closing of the 'concurrent enrolment' loophole to ensure international students do not move from one provider to another within six months of arrival. We would be supportive of a strengthening of this provision, requiring students to remain at a provider for at least twelve months, unless they are released for compassionate or compelling reasons, as well as a more rigorous enforcement of visa conditions.

However, we caution against significant further reforms for the university sector as instability and uncertainty would undermine Australia's global reputation as a provider of world class higher education. Instead, we suggest that quality and integrity issues should be addressed through the powers that agencies such as TEQSA and ASQA already have to grant or remove a provider's CRICOS registration.

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

The University of Queensland's (UQ) international education strategy is focused on responsibly sustaining managed growth with a focus on quality and diversity. This is achieved through a range of mechanisms including:

- High entry standards including the requirement that students must have achieved a minimum of 6.5 overall and at least 6.0 in each sub-band of the IELTS test (with higher requirements for some courses).
- Close management of our agent networks to ensure we enrol only high quality, genuine students. This includes best-in-class practices relating to counsellor training, performance monitoring and commission clawbacks.
- A focus on strategic institutional partnerships to support the recruitment of students from a diverse range of markets into a diverse range of programs.



UQ also invests in ensuring the quality of our international student experience, including:

- A guaranteed accommodation scheme for commencing students supported by the provision of dedicated student accommodation, with a new student residence complex currently being planned. This new student residence will double the number of places available in UQ-owned accommodation.
- Supporting inclusivity with dedicated strategies that engage international students. This includes connecting students to on-campus academic support forums and workshops to enable success throughout their studies, supporting students to engage with the local community to build genuine connections, and further strengthening our support in relation to English language proficiency.

Objective 2: A managed system to deliver sustainable growth over time

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

The proposal to give the Minister for Education powers to limit international enrolments at an institution, course and location level will result in a concerning loss of autonomy for universities, restricting their ability to set and advance their own financial and strategic direction.

Moreover, international education is one of Australia's great success stories. Recent [analysis from the National Australia Bank](#) shows that international students contributed to over half of Australia's GDP growth in 2023 (0.8% out of 1.5%). International student revenue also contributes very significantly to the strength of our research ecosystem, an outcome that has considerable benefits for Australia's profile and reputation, more broadly.

We recognise that there are significant pressures on Australia's housing market and that the sector's social licence can be undermined by growth that is seemingly unmanaged. However, a centralised micro-managed approach to addressing these issues runs the risk of undermining the sector's global reputation and, as a consequence, having adverse economic effects.

The government should consider the financial sustainability of the institution, the quality of the education it provides and the contribution the institution makes to the public good with regards to both teaching and research

Universities are not-for-profit institutions with clear missions to deliver for the public good. All revenue is invested back into teaching and research and so any constraints on a university's ability to generate revenue will have significant implications for what can be delivered here and now, and what investments can be made for the future.

Analysis undertaken at UQ shows that international student revenue helps support the indirect costs of externally funded research that are not fully covered by the Research Block Grant. At 1.68%, Australia's spending on research and development is already substantially below the OECD average of 2.7%. Restricting growth in international student enrolments within the university sector will undermine the goal of increasing R&D expenditure to 3% of GDP, and have detrimental effects on the quality and impact of Australia's research ecosystem.

International student revenue also supports the delivery of high-quality education. It helps us to upgrade our teaching infrastructure, invest in scholarship funds to support students from under-represented backgrounds (both domestic and international), and introduce new co-curricular opportunities to benefit the entire student cohort.



Moreover, educational outcomes for all of our students are enhanced by the opportunity to engage with peers from a diverse range of backgrounds, exposing them to a range of cultures, ideas and alternative perspectives and providing opportunities to foster global connections. We closely monitor the perceptions of our students through mechanisms such as the Student Experience Survey. Recent results show that more than 80% of both our domestic and international cohorts give positive ratings in relation to teaching quality and the quality of the student experience.

In setting university level enrolment limits, the government should ensure growth is not restricted to the extent that it undermines investments in teaching and research. We are also of the view that any limits should not require 'negative' growth and that a safety net should be written into the proposed legislation to ensure that universities will not be required to reduce international enrolments from where they were in the prior year.

The government should consider other areas of government policy, particularly those arising from the Universities Accord process in relation to Commonwealth Supported student numbers

The Government has recently announced that, from 2026 onwards, a managed growth target approach will be used to allocate Commonwealth supported places (CSPs) to universities as part of their mission-based compact discussions. Our view is that the setting of managed growth targets for international student load should occur as part of these compact discussions so that the optimal size and shape of each institution can be considered holistically.

The government should recognise the complexities of managing student admissions and enrolments and provide appropriate flexibility.

Managing student enrolment numbers is complicated. Historical trends are used to predict commencing and returning student numbers, but final enrolments are influenced by a range of factors outside of an institution's control. UQ is therefore concerned with the proposal to automatically suspend CRICOS registration for the year if enrolment limits are exceeded given the precision that this mechanism requires. A regime of automatic suspensions is likely to have unintended consequences and its feasibility would also be challenged by the practicalities of managing enrolment numbers in an environment of multiple intakes and graduation points across the year. As an alternative, the mission-based compact process could be used to manage international student numbers within individual universities.

Furthermore, institutional enrolment limits will create significant uncertainty for applicants. Their likelihood of obtaining a place at their preferred institution will no longer simply be a factor of their ability to meet admission and visa requirements but will also be affected by restrictive institutional caps. This could become a significant disincentive for students to choose Australia as a study destination, an outcome that would have significant impacts on the strength of our economy.

The impact on global educational partners and efforts to grow enrolments from emerging markets and diversity the discipline mix should be considered

UQ has a range of longstanding and newly developed global partnerships to support our efforts to diversify our international student cohort and discipline mix. Under these arrangements, students complete the first semesters of their degree at their home institution before transitioning to UQ for their final years.

These partnerships align to countries that are strategically important for Australia, leveraging on UQ's areas of strength. They include high quality institutions such as Universitas Indonesia, Indian Institute of Technology Delhi, Ochsner Health, Technical University of Munich and University of Exeter. We are concerned that such agreements could be undermined by the uncertainty of government set enrolment limits.



Enrolment limits and further visa processing delays will also undermine diversity efforts more directly as they are likely to encourage institutions to focus on the markets with a greater conversion and the capacity to withstand higher fees. At UQ, we currently offer a range of fee scholarships and awards to support high achieving students from emerging markets and from key partner institutions. If international enrolments are restricted, there is a risk that such mechanisms will be curtailed.

The impact on Australia's foreign policy and bilateral relations

Student sponsorship schemes, such as the Colombo Plan, have created a global network of leaders in government, industry and academia who remain actively engaged with Australia. These networks provide a strong foundation for establishing trade, diplomacy, national security and academic alliances. In 2023, UQ welcomed close to 1000 international sponsored students from 70 countries, the majority coming from Indonesia, Malaysia, Colombia, Saudi Arabia and China. Such partnerships align with Australia's strategic engagement goals in India, the Indo-Pacific and the ASEAN region.

Sponsored students enrol in courses that align with the capacity building and socio-economic priorities of their home countries and are usually required to return home after graduating to apply their newly acquired knowledge and skills. UQ recommends that sponsored students be considered carefully in any new arrangements to manage international student growth in order to ensure that universities can continue to support Australia's strategic engagement goals.

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

Australia's higher education international education system is fundamentally demand-driven and operates in a competitive global market. It benefits from a strong reputation, however we are concerned that this will be impacted by government intervention into international enrolment numbers. Students can and will opt to study in another country if Australian Government policy locks them out of their preferred provider/course or they perceive their plans may be unexpectedly blocked. The loss of momentum in international student attraction would be difficult to recover from, risking the "growth" element of the government's managed growth objective.

We also argue that higher degree by research students should be excluded from any enrolment limits as these students provide a significant contribution to Australia's research capacity and capabilities, at the same time as fostering global research relationships. As previously stated, we recommend that sponsored students be excluded to ensure that universities can continue to support Australia's strategic engagement goals.

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

Many of the impacts on individual providers are outlined in our response to Q1. Our overarching concern is that the proposal to introduce government control over institutional, course and location level enrolment numbers will result in a loss of autonomy for universities, at the same time as being very difficult to manage given the complexity of the system. Using the mission-based compact process is recommended as a more effective and manageable way to responsibly manage the growth and diversity of student load at each of our universities.



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?

The school and ELICOS systems provide pathways for international students into higher education and vocational education. These onshore pathways are important for maintaining quality within the tertiary education system. We therefore do not think the school and ELICOS systems should be included in any strategy to manage growth, however the quality of their outcomes should be appropriately monitored.

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

Post study work rights and graduate visa settings should be the primary mechanism for leveraging international education to address skills shortages. Pathways to permanent residency will attract students to study in areas of national priority more so than relaxed limits on enrolments in specific courses. Furthermore, following the [Review of the Migration System 2023](#), there have been a number of policy changes to reduce the number of international graduates remaining in Australia and ensure those with a student visa are genuine. We believe it is important to understand the impact of these reforms before considering further changes.

Australia's International Education and Skills Strategic Framework: Draft for Consultation suggests that international students should be encouraged to enrol in national priority areas such nursing, but the limited availability and high cost of clinical placements impacts on the number of places universities can offer in these areas. Unless these issues are addressed any policies aimed at growing international student numbers could have the unintended consequence of reducing the number of places available to domestic students.

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

We understand that there are currently significant pressures on the housing market. For this reason, the provision of student housing is a priority for UQ. We have a student accommodation program that guarantees first-year domestic and international students secure, suitable accommodation. We provide more than 4390 places on campus through UQ-owned and operated student accommodation and 10 affiliated residential colleges. We also work closely with student accommodation providers and vetted student housing to facilitate a further 16500 places. Our records suggest that a third of our international students currently live in purpose-built student accommodation. UQ is also looking to invest in a new student residence complex in order increase the number of university-owned accommodation places.

While universities have an important obligation to help students with their accommodation needs, there is a long lead time required to design and build new accommodation facilities. In this context, limits on enrolments could discourage private investment and reduce the capital available to universities to invest in their housing. As has been recently highlighted in the [media](#), the plan to introduce international student caps, and the suggestion that international students are a key driver for the housing shortage, is already undermining investor confidence.



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

At UQ, we strongly recommend that the introduction of enrolment limits not commence until 2026 at the earliest so that adequate notice can be given to prospective students, noting that universities accept international student applications a year or more in advance of an intake. A 2026 start date also has the advantage of aligning with the proposed date to introduce managed growth targets for Commonwealth supported students, enabling a holistic approach to centralised enrolment planning.

Objective 3: Taking Australian education and training to the world

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

Onshore, offshore and transnational delivery of education typically service different segments of the international education market. At the university level, offshore and transnational delivery can help facilitate bilateral relationships with countries of strategic national importance, develop capabilities and capacities in those countries, advance global research partnerships, build global branding and reputation, and support market diversification. However, key barriers for universities exist – they include:

- the significant financial investment required to set up and maintain such arrangements;
- the challenges and costs associated with establishing mutually beneficial partnerships with reputable institutions that have aligned strengths in education and research;
- socio-political factors, for example concerns about academic freedom, geo-political relations, government stability and economic outlook;
- managing the regulatory environments in both Australia and the host country; and
- the fact that repatriation of funds from offshore operations may not be allowed.

While the introduction of international enrolment limits will drive some interest in considering TNE delivery offshore, the financial considerations and inherent risks, especially in the start-up phase, is likely to limit such activity.

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

UQ welcomes government support in the form of intelligence, due diligence assistance and direct access to regulatory advice through diplomatic channels when pursuing transnational opportunities. Navigating the compliance requirements in other countries can be challenging. Support could also be provided through a funding/startup scheme for universities that wish to establish a campus or physical presence in priority countries with the backing of trusted local service providers.

If student visa caps are implemented, consideration could be given to exempting students who have studied at offshore campuses of Australian institutions from the caps. This would strengthen the business case for new TNE campuses.