INDEPENDENT HIGHER EDUCATION AUSTRALIA

# IHEA SUBMISSION

# SENATE INQUIRY INTO EDUCATION SERVICES FOR OVERSEAS STUDENTS AMENDMENT (QUALITY AND INTEGRITY) BILL 2024

1 July 2024

## TABLE OF CONTENTS

# IHEA Submission

# Senate Inquiry into the Education Services for Overseas Students Amendment (Quality and Integrity) Bill 2024

Independent Higher Education Australia (IHEA) welcomes the Senate Inquiry into the Education Services for Overseas Students Amendment (Quality and Integrity) Bill 2024 (ESOS Bill), for which submissions are due by 13 June 2024.

## OVERVIEW OF SUBMISSION

IHEA is concerned that the proposed amendments to the ESOS Bill represent a regulatory overreach, are overly restrictive, will further reduce the number of international students who choose to study in Australia and will have a deleterious impact on Australia's reputation.

The amendments will allow the Minister for Education absolute discretion in controlling international student numbers. We have serious concerns about the Minister being unilaterally (with advice from the Minister for Skills and Training) solely able to cap international student enrolments; at a provider level; by education provider category; by class of courses; by location; and with "reference to any matter". Such discretion is unprecedented. In the absence of further detail, or at a very minimum, criteria, including consultation with the sector in making such decisions, the proposed Bill raises legitimate and real concerns about objectivity, as opposed to arbitrariness, of how decisions will be made.

While the Bill purports that regulatory changes are necessary to ensure the quality and integrity of providers that are operating in the international education sector, the approach is highly questionable. Given that

the Tertiary Education Quality and Standards Agency (TEQSA) and the Australian Skills Quality Authority (ASQA) are the national regulators responsible for ensuring the quality and integrity of higher education and vocational education and training (VET) providers that they register, the broad–brush approach will not be able to specifically address and target exploitative behaviour, without having a significant impact on genuine students and high quality providers.

A better approach would be to rely on the sanctions, such as suspensions and cancellations, imposed by TEQSA and ASQA on providers as a measure of quality and integrity. Neither the entire tertiary education sector nor the entire independent sector should be subject to the same constraints and regulatory burden that should be focussed on targeting the providers that are actually doing the wrong thing. It should consider the diverse landscape of providers and tailor integrity measures accordingly and specifically. We note that of over 1400 registered Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) providers, only 34 letters have been issued under the ESOS Act.

Increased transparency is a matter of great importance to IHEA. While we support the provision of education agent data to providers to inform decision making about which agents to partner with, we do not support the publication of education agent commissions, as this information is commercial–in–confidence, which has the potential to negatively impact individual providers as well as Australia’s competitiveness. To do so, may also be a breach of some countries' privacy and data collection requirements.

With respect to the allocation of international student enrolments, IHEA's position is that independent higher education providers should not be subject to this arrangement, since the key objective of such an approach must be to curtail the significant growth that has occurred in some public universities. This has occurred while many providers in the sector, including independent higher education providers, have been subjected to blanket student visa refusals. Further, between 2019 and 2023, there has been very strong growth in VET, in which onshore international student enrolments increased by 16.5 per cent, during which time onshore international student enrolments decreased by 5.1 per cent in higher education. These imbalances need to be corrected.

This has already had a significant and adverse impact on independent higher education providers who make a significant contribution to their local economies through creating employment opportunities and demonstrating a dedication to serve students, staff and the wider community. Independent providers are often established with private funding and at personal risk and investment, without the Government support afforded to public institutions. In spite of this, they have built a reputation based on quality and achieving excellent outcomes, however, the impost of the current measures is directly impacting these providers and the hard working Australians, and their families, who are behind these providers.

The introduction of allocations should be subject to a transition period of more than 12 months to allow for the management of existing pipelines and forward offers of enrolment – which are often focused on an intake two years into the future. Allocations should be specific providers that have experienced significant growth in international student enrolment during 2024, while the rest of the sector, including independent higher education providers, has experienced reductions. It is important that any allocation process has as its primary goal to rebalance the international student enrolments that are presently skewed following the application of blanket visa refusals.

We are also concerned about narrowing study undertaken by international students to align with Australia's skills needs. International students should be able to access the courses that fulfil their needs and ambitions and imposing courses on students will undoubtedly shrink Australia's valuable international education market further as students seek other destinations to study what they require. Given the vast majority of international students (approximately 80 to 90 per cent) return home at the end of their studies, it is not clear what this proposed amendment will achieve, other than to further harm Australia's international reputation; the result will be a decline in confidence in Australia as a destination for students as well as with reputable education agents with extensive experience, who will turn their attention to other markets.

Diversification should be critical to the sustainability of Australia's international education landscape. This goes to the source countries of students – significant efforts over the last two decades are being undermined by current policy settings that are putting greater focus and dependence on students from China. The approach of dictating what courses international students undertake is counter to the stated importance of student experience and being student–centric, as it takes choice away from the student. The diversification of higher education providers is also critical to the Australian international education landscape, which ensures students have choice and can have the opportunity of a high quality student experience.

In considering the importance of students and the student experience, this process should consider providers' regulatory record, their registration as a self–accrediting authority, and their performance in the annual Quality Indicators for Learning and Teaching (QILT) student experience surveys and Graduate Outcomes Surveys (GoS). Independent higher education providers demonstrate year after year outstanding QILT results for domestic and international students. This is direct feedback from students about their experience while studying. This needs to be considered in terms of supporting these providers to continue enrolling international students, based on the views of the people who matter most – the students.

To that effect, it is perplexing and challenging to reconcile the government’s claim that raising the quality of the sector is a priority while simultaneously announcing an $8 million reduction in funding for the QILT surveys, which are among the instruments best suited to exposing the sector’s most nefarious operators.

However, the important role independent higher education providers perform in supporting students to achieve their goals and to realise their ambitions through a second to none experience is often ignored and overlooked. Of deep concern is a provision within the ESOS Bill, which will require new providers seeking registration to demonstrate a two year track record of quality education delivery to domestic students before they are allowed to recruit international students.

Once a provider is registered with TEQSA, they are able to apply to the Department of Education (DoE) for approval to offer Higher Education Loan Program (HELP) loans, such as FEE–HELP. In doing so, DoE may consider if

the provider has sufficient experience in the provision of higher education and whether the body/provider has been a registered higher education provider for three or more years. It is our understanding that it is DoE's practice to take these matters into consideration. The effect of this is that for the first three years of operation, an independent higher education provider will need to operate without enrolling students with access to FEE–HELP or international students. During this period, they would only be able to enrol domestic students paying full fees – who cannot access a loan for those fees – and competing against providers who can offer loans, which makes their operation unsustainable and effectively puts a stop to new independent higher education providers entering the market.

There have been a number of recent regulatory changes, including increased visa refusals; increasing financial capacity requirements by 41 per cent since 1 October 2023; and increasing the non–refundable student visa application fee by 125 per cent from 1 July 2024 (of which IHEA's view is that a percentage should be refundable to the student). Against this backdrop, IHEA believes the proposed provisions under the ESOS Bill and the draft of Australia's International Education and Skills Strategic Framework (the Framework) represent an overreach of what is needed to address genuine issues of integrity given the existing regulatory frameworks (i.e. TEQSA and ASQA). It also sets up a puzzling and unnecessary contradiction. The Minister can cancel registration for specific courses or class of courses that TEQSA has approved a provider to deliver. Such Ministerial discretion only serves to sideline and undermine TEQSA, which will also create confusion and over–regulation. It is not clear what advice the Minister will seek to make these decisions. If it is based on perceptions or active regulatory actions by the regulator, then this is clearly best left to the regulator as it is part of their key role and function.

Rather than further burdening the sector with additional regulation, the Government would be better served by directing resources toward existing systems that would serve as more reliable quality assurance indicators if they were made more efficient. More specifically, TEQSA produces an annual Provider Risk Assessment for every registered higher education provider, but as acknowledged by the CEO of TEQSA at IHEA's Annual General Meeting in May 2024, the data upon which the risk assessments are based is anywhere between six months and two years out of date, thereby rendering it as a barely relevant lag indicator – and certainly not current.

The consequence of an overly prescriptive Bill, which also lacks critical detail, is that it will adversely impact providers that are delivering high quality courses and the best possible student experience, while denying prospective international students of what is supposed to matter most – their experience, choice and the right to pursue their own interests and fulfil their aspirations. It also reduces the likelihood of providers delivering important, cutting edge, niche programs of study that need enrolments from both the domestic and international markets during their early years of delivery to be sustainable. The impact could be significant, leading to job losses, provider closures and further collapsing the international education market. There is a real danger that these measures will cause lasting, and potentially irreparable, damage to Australia's fourth largest – and largest services and non–resources – $47.8 billion export industry.

Please note that as outlined in the Explanatory Memorandum to the ESOS Bill, 'ESOS Agencies' refers to TEQSA, ASQA and the Secretary of DoE. The term ESOS Agencies is used throughout this submission.

## PROHIBITING AGENT COMMISSIONS ON STUDENT TRANSFERS BETWEEN PROVIDERS IN AUSTRALIA TO REMOVE INCENTIVES FOR AGENTS AND PROVIDERS TO FACILITATE STUDENTS MOVING BETWEEN PROVIDERS

*Part 1 of the Bill includes amendments to require providers to give information about education agent commissions, if requested by the Secretary. Education agent commissions may, in some cases, incentivise agents to facilitate student enrolments and course transfers for maximum profit, rather than in the best interests of the student. This amendment specifically relates to amendments in Part 2 of Schedule 1 to the Bill.*

*It is stated that defining 'education agent commission' in the ESOS Act will allow the Minister to make complementary amendments to the National Code of Practice for Providers of Education and Training to Overseas Students 2018 to ban commissions from being paid by providers to education agents for onshore student transfers.*

IHEA is concerned that the banning of all onshore commissions would also impact and disrupt current, legitimate arrangements that are in place. It may not necessarily resolve the issue of concern and may lead to direct engagement between students and agents without the protections afforded under the ESOS Act, which come into effect when a provider is involved, as well as Consumer law. Further, prohibiting all agent commissions for onshore transfers fails to recognise the appropriate and valuable role that agents generally play in supporting students to appropriately transition to new courses. It does not acknowledge that for quality agents, their relationship with students often continues throughout the life of their study in Australia through delivering a significant range of services other than simply assisting in selecting a course and provider.

There are many legitimate reasons why an international student may wish to transfer to another higher education provider (or why VET students want to move into higher education courses to better meet and fulfil their skills and knowledge requirements and meet their identified needs):

- The original course is no longer suited to them and as such they wish to transfer to a more relevant course at the same Australian Qualifications Framework (AQF) level.
- The student was not academically successful at their original provider and now need to pursue alternative study options at a more supportive provider where they can receive the type of attentive and responsive support they require.
- They are enduring a poor experience with their original provider since they incorrectly assumed there would be a positive correlation with high research–based rankings and a strong student experience; or
- They simply need to relocate to another state in which their original provider does not have an established campus.

The proposed commission ban would deny these students access to a reputable education agent who could support them appropriately and as such would be consequentially denied the opportunity to benefit significantly via a transition to a provider with an exemplary reputation for high–quality education. We fear this will create unprecedented vulnerabilities for international students, particularly those released by their provider under the 'compelling and compassionate' circumstances that are detailed in the National Code. Given the focus on the welfare of students, student choice and student experience, which is also clearly articulated in DoE's draft Framework, the withdrawing of student choice – and removing legitimate assistance to support students moving away from a poor experience with a provider – is at odds with this mission. It may present an easy, bureaucratic fix to apply a blanket ban, but it does not target or address the root cause of the issues and will have a negative impact on legitimate students and high quality providers. It also limits consumer rights on the part of international students as they are not afforded the best and most appropriate advice.

Further, there is the potential that 'black market' agents could be inadvertently incentivised following the removal of the direct relationship between provider and the agent, resulting in a loss of the current safeguards and responsibilities that exist through the ESOS Framework. It would mean there is no visibility of this sort of exploitation, which would be conducted outside of the system. This could result in students' safety and wellbeing put at risk and vulnerable to exploitation. This has the potential to damage Australia's reputation as a destination for international students.

While we understand that the commission ban is being proposed to limit 'course hopping' and 'poaching', it could actually increase instances of this happening if unscrupulous providers feel they are no longer required to act within current contractual commission obligations. This may lead to offering even more significant discounts directly to students, which would place downward pressure on tuition fees at the expense of quality education providers and the establishment of 'in–house' agencies to recruit students.

We also believe it is very important that other forms of onshore recruitment through agents (such as recruitment of non–student visa holders or following completion of a program – i.e. between undergraduate and postgraduate) are not unintentionally prohibited based on how the changes are designed and drafted. It would be beneficial to understand how compliance and enforcement of a blanket ban would occur as it is not apparent how enforceable such an arrangement would be.

IHEA does not support the proposed amendment but suggest other more nuanced and risk–based approaches that are more likely to address the issues of 'poaching' and 'course hopping', such as:

- An approach that prohibits agent commissions during the six month restrictive period (as per the ESOS Act) but does not prohibit commissions for transfers during other periods of time. Some IHEA members support the extension of this period to 12 months; and/or
- That the banning of onshore commissions only applies when the student is moving to a course at a lower AQF level. It is this option that we expect will most directly meet the Government's core objective since it would effectively arrest the illegitimate outflow of students from higher education to VET. It is worth noting that students have the right to unilaterally withdraw from a course and enrol somewhere else, including at a lower AQF level and usually as a direct outcome of 'poaching' by a VET provider. This has been known as an issue since 2021 and reported to regulators by quality providers, but without action.

## PREVENTION OF EDUCATION PROVIDERS FROM OWNING EDUCATION AGENT BUSINESSES

*Part 1 of Schedule 1 to the Bill proposes amendments to the fit and proper provider test, the ESOS agency (TEQSA or ASQA) or designated State authority for a provider must, in deciding if the provider is fit and proper to be registered, have regard to whether:*

- *The provider, or an associate of the provider, has any ownership or control of an education agent and if so, the value or extent of the ownership or control; and*
- *An education agent, or an associate of the education agent, has any ownership or control (whether direct or indirect) of the provider, and if so, the value or extent of the ownership or control.*

In–principle, IHEA supports the overarching objective of this measure, but it is important that legitimate business activity is not arbitrarily excluded. We are heartened that this measure will only be a consideration in determining if the provider is fit and proper for registration and it won't be cause alone for deregistration.

We are aware of a number of scenarios, as outlined below, which represent legitimate provider operations and which should not be captured by the proposed legislative changes.

- Scenario 1: Providers that partner with universities to deliver managed campus or joint venture arrangements. In some partner arrangements, independent providers act as a 'parent' or a 'master' agent with a university. This enables the university partner to efficiently access the independent provider's agent network. The alternative would require the university to partner individually with each agent that the independent provider engages with. The provider is likely to be undertaking a range of other activities on behalf of the university, including managing the marketing, recruitment, campus facilities, admission of students and delivery of programs for the managed campus on behalf of the public university.

  In line with the current requirements of the ESOS Act and National Code of Practice for Providers of Education and Training to Overseas Students 2018, the university partner will identify the independent provider as a partner agent, despite the independent provider not separately owning any independent recruitment agencies. Such an arrangement clearly does not meet IHEA's understanding of the intent of this measure.

- Scenario 2: Ownership of education agents by the parent company of a provider. For multinational organisations, a parent company of a provider may own education agents in offshore markets, but which do not have a focus on promoting – and recruiting for – higher education providers in Australia. Clearly this type of arrangement should not be captured by the reforms.

- Scenario 3: Legitimate ownership and operation of an education agent and advisory business by a provider that is registered on the Australian Stock Exchange. An exemption of such an arrangement should be ensured as it is low–risk, as outlined below – and does not involve predatory or unscrupulous conduct that the proposed changes seek to remedy, even though it may meet the technical definition:
  - The parent company is listed on the Australian Stock Exchange, which ensures a high level of transparency.
  - The revenues generated from the arrangement are small, i.e. approximately 5 per cent of the gross revenue.
  - The ownership structure means there is a high level of transparency and governance focus from directors and senior executives of the independent provider.
  - The independent provider has sufficient funds to invest in a quality student recruitment experience, which removes any potential for pressure to be placed on employees to participate in unscrupulous behaviours.
  - Only approximately 10 per cent of the international students the agent recruits are enrolled into courses with the independent provider and students are not poached from other Australian

education providers. This would impact on their sector reputation and diminish their capability of generating 90 per cent of the revenue.

- The agent recruits international students from its offices in established and low risk markets.

While IHEA agrees with the principle and intent of the proposed measure, there is also an opportunity to consider a risk–based and nuanced approach that will achieve the intended outcome without impacting the business operations of legitimate providers. Alternative factors that may help to inform a determination about whether to allow or prohibit a provider–education relationship include:

- The track record of governance and compliance of the provider.
- Evidence of 'poaching' students from other providers.
- Source countries targeted for recruiting international students.
- The percentage of international students the provider takes from any ownership, operation or co–ownership of an education agent.
- Visa rejection rates of both the provider and agent.

Definition of education agent

*For the purposes of understanding the scope of coverage of an 'education agent', the ESOS Bill introduces a new definition of an education agent as an entity (whether within or outside Australia) that:*

*(a) engages in any one or more of the following activities in relation to a provider:*

*(i) The recruitment of overseas students, or intending overseas students.*

*(ii) Providing information, advice or assistance to overseas students, or intending overseas students, in relation to enrolment.*

*(iii) Otherwise dealing with overseas students, or intending overseas students; and*

*(b) is not a permanent full–time or part–time officer or employee of the provider.*

While IHEA supports clarity through the definition of an education agent, the references to people who "provide advice or assistance" to overseas students or are "otherwise dealing with overseas students" seems quite broad, far–reaching and may capture people who are not engaged in a financially beneficial relationship with a provider. While we understand the intent is to capture all situations where there are monetary and non–monetary agreements and benefits to agents, it is not clear how a compliance regime will support the identification of non–monetary benefits.

It is worth noting that part ii) as drafted above may capture Australian and State and Territory Government agencies, such as Austrade and Study NSW, which reinforces the need for a narrower definition.

## IMPROVING THE SHARING OF DATA RELATING TO EDUCATION AGENTS

*Part 2 of Schedule 1 to the Bill proposes to amend the ESOS Act to enable providers to have better access to education agent information to assist them with making informed decisions about the particular education agents they want to engage with to deal with overseas students.*

*It is stated that the Secretary of DoE, or an ESOS agency, will give providers information, via a secure channel, relating to the number of transfers of accepted students dealt with by an education agent, from one provider to another and from one course to another, as well as information about commissions (fees, charges or other consideration) that are paid or payable to an education agent relating to the recruitment of accepted students.*

IHEA supports increased transparency around agent performance data. The existing arrangements severely impact the ability of providers to actively and effectively manage their agent network. While information is available on the performance of existing agents for students applying for/attending a provider's own institution, information on agent performance is not shared with other providers. This can be detrimental to understanding – and having visibility of – the broader field of agents' actions, performance and inappropriate behaviours. This makes it challenging for a provider to assess new potential agent partners. Data needs to transparently identify which providers an agent is working with as well as the country of origin of the international students they are recruiting. The sector has been advocating for this level of transparency for many years.

The specific education agent performance data that should be made available is as follows:

- Visa success rates that would provide information to providers to make informed decisions in a form that is familiar to all providers.
- Information on visa rates for individual agents for the whole sector, acknowledging that an agent that has a good visa rate for one provider, may not necessarily have a good visa rate overall, but should be considered in decisions.
- Transparency on agent agreements that have been terminated. This should include information on the reasons for termination, with this information not currently available to providers.
- Access to agent performance measures for not only agents in existing relationships, but also other agents. This will support decision–making for providers when signing new agent partnerships.
- Details on agents that are on the migration agent list and any breaches/negative performance. This includes where agents are dual–sector agents, visa rejection rates for other visa types and when agents have been struck off the migration list.

IHEA is aware that there is some advocacy around the publication of agent commissions. We do not support the publication of agent commissions, given this information is commercial–in–confidence, which has the potential to negatively impact individual providers as well as Australia's competitiveness in a global market. The likely outcome is that quality agents will turn away from Australia as a destination in favour of our major competitors in the United Kingdom, the United States of America and Canada.

## PAUSE APPLICATIONS FOR REGISTRATION FROM NEW INTERNATIONAL EDUCATION PROVIDERS AND OF NEW COURSES FROM EXISTING PROVIDERS FOR PERIODS OF UP TO 12 MONTHS

*Part 3 of Schedule 1 to the Bill will allow the Minister for Education powers to make determinations, via legislative instruments and with the agreement of the Minister responsible for administering the National Vocational Education and Training Regulator Act 2011 (NVETR Act) (currently the Minister for Skills and Training), to specify up to a 12–month period where ESOS agencies are not required to, or must not, accept or process initial applications for registration by new providers and for the registration of new courses by registered providers.*

*The stated intent of these proposed amendments is to manage the system to deliver sustainable growth over time in the international education sector, and, if required, divert resources to addressing integrity issues that arise. The Ministerial determinations may apply to all initial applications or apply to a particular class or classes of providers or courses, so that there is flexibility to allow some providers and/or courses to progress*.

IHEA is concerned at the wide sweeping power this provides the Minister for Education, without setting out any criteria to be considered to inform such decisions. This has the real potential of making such decisions very subjective. As outlined elsewhere in this submission, such powers have the potential to significantly further damage Australia's international education sector and its reputation as a destination of choice for international students.

Denying the entry of new providers, who will already be registered by the national regulator for higher education (TEQSA) or VET (ASQA), is confounding. Both regulators are charged with ensuring the integrity and quality for providers that they register and this additional bureaucratic overlay serves only to undermine their role and place unnecessary barriers on providers that lacks rigour and transparency.

The further denying of adding new courses to registered providers again places an inappropriate limitation on student choice. The courses will be added by new providers to address the needs of students – denying this also denies innovation in the system to deliver courses that, for example, respond to evolving technologies, which address cybersecurity and manage disruptions from artificial intelligence.

For these reasons, IHEA does not support such a discretionary and unnecessary overlay that will negatively impact students and providers, leading to a lack of certainty, clarity, objectivity and transparency and damage Australia's reputation as a destination for international students.

## REQUIRE NEW PROVIDERS SEEKING REGISTRATION TO DEMONSTRATE A TRACK RECORD OF DELIVERY TO DOMESTIC STUDENTS BEFORE THEY ARE ALLOWED TO RECRUIT INTERNATIONAL STUDENTS

*Part 4 of Schedule 1 to the Bill will impose a new registration requirement on providers to deliver one or more courses to domestic students (i.e. not overseas students) for consecutive study periods totalling two years, in order to be eligible to apply for registration to provide courses to overseas students under the ESOS Act.*

*It is stated that this amendment will deter non–genuine providers from entering the international education sector purely for facilitating migration outcomes, to ensure that a provider is genuinely intending to deliver educational outcomes for students. Providers that are listed in Table A of the Higher Education Support Act 2003 and providers that are seeking registration as standalone English Language Intensive Courses for Overseas Students providers or standalone Foundation Program providers will be exempt from the new registration requirement.*

The application of this proposed amendment will almost certainly have the effect of precluding the entry of new independent higher education providers to the market.

Once a provider is registered with TEQSA, they are able to apply to DoE for approval to offer Higher Education Loan Program (HELP) loans, such as FEE–HELP. The provider can do this immediately after receiving TEQSA approval. However, under section 16–25(1)(fb) of the Higher Education Support Act 2003, DoE may consider if the provider has sufficient experience in the provision of higher education. Further to this, in assessing an application for FEE–HELP under section 16–25(2A) of the Act, DoE may consider whether the body/provider has been a registered higher education provider for three or more years. It is our understanding that it is DoE's practice to take these matters into consideration.

The effect of this, when combined with the proposed new arrangements under the ESOS Bill is that for the first three years of operation, an independent higher education provider will need to operate without enrolling students with access to FEE–HELP or international students. During this period, they would only be able to enrol domestic students paying full fees – who cannot access a loan for those fees – and competing against providers who can offer loans, which makes their operation unsustainable and effectively puts a stop to new independent higher education providers entering the market. The arrangement is discriminatory, anti–competitive and disadvantages independent higher education providers.

The presumption that all new higher education providers – since this is a blanket arrangement – are non–genuine is completely false. It is perplexing that after receiving registration from the national regulator, other hurdles are put in place to prevent the provider from operating and completely undermines the role and decision making of TEQSA, which has registered the provider. Further the delivery of higher education courses to domestic and international students differs, and these arrangements do not recognise the benefits of providers who are specialists in a field as being important and beneficial.

It is confusing as to why Table A and ELICOS providers have been singled out for exemption, which further illustrates the arbitrariness of this arrangement and that it is not premised around risk–based decision making – in fact it goes against a decision made by the national regulator. Given the majority of ELICOS providers are also higher education and/or VET providers it raises the question of how such an exemption can work in practice. As such, IHEA does not support this amendment, which at an absolute minimum should provide a mechanism for exemption of other providers, including independent higher education providers, to meet the same benefit that is afforded to all Table A and all ELICOS providers.

## CANCELLING DORMANT PROVIDER REGISTRATIONS

*Part 5 of Schedule 1 to the Bill will enable the automatic cancellation of a provider's registration under the ESOS Act, by force of law, in circumstances where the provider has not delivered a course to overseas students in a period of 12 consecutive months.*

*It is stated that the intent of this amendment is to address integrity issues posed by dormant providers who may be using their registration under the ESOS Act for non–genuine or fraudulent purposes, and providers that are not demonstrating a genuine commitment to the delivery of courses to overseas students.*

*Where a provider may have a legitimate, reasonable justification for not providing a course or courses during this period, they may apply to their ESOS agency for an extension to ensure that the registration will not be cancelled until the end of the extension period. An extension can be granted more than once, but the total period of extensions must not exceed 12 months. Legitimate circumstances may include that the provider is newly registered under the ESOS Act and there are operational challenges in commencing the delivery of courses, or there is a natural disaster such as fire, flood, or a pandemic event.*

*The Bill also proposes amendments to ensure that extension decisions are subject to internal and external merits review (via the Administrative Appeals Tribunal or, subject to the passage of legislation, the proposed Administrative Review Tribunal) in line with other reviewable decisions under the ESOS Act.*

There are a number of legitimate reasons why a provider has a registration that is dormant. For example, it allows flexibility whereby a provider may temporarily pause their operations due to various reasons, such as restructuring, market changes, or unforeseen circumstances. By maintaining a dormant registration, a provider can easily re–activate it when circumstances improve without going through a costly registration process again.

For example, in response to widespread visa refusals that we have seen occur under the Migration Strategy, which has included and impacted high quality providers and genuine students, some providers may choose to pause their enrolment of international students given that visa refusals can impact their Evidence Level in the future. Cancelling their registration would seem to be a needless burden under such circumstances as re–registration will incur additional costs to the provider. Cancelling the registration of dormant providers may also discourage smaller or specialised providers from entering the market, who may offer unique but valuable programs and/or service niche markets.

We are pleased to see that there are grounds for the extension of the period in which a provider is dormant as well as opportunity for merits review. All decisions should be made consistently, transparently and with clear communication to providers.

## PREVENTING PROVIDERS UNDER SERIOUS REGULATORY INVESTIGATION FROM RECRUITING NEW INTERNATIONAL STUDENTS

*Part 6 of Schedule 1 to the Bill includes another amendment to the fit and proper provider test aimed at providers who are under investigation for specified offences. The stated intent is that where an ESOS agency, or designated State authority, has determined that a provider does not meet the fit and proper provider test because the provider is under investigation for a specified offence, the provider's registration will be automatically suspended under section 89 of the ESOS Act. This amendment expands the circumstances which could result in a provider's registration being automatically suspended.*

IHEA supports measures that actually target providers that are doing the wrong thing. It is important that such measures are based on evidence and transparency and delivered without prejudice or presumption of wrongdoing.

Our position is that TEQSA and ASQA, as the national regulators for higher education and VET, should take primary carriage of ensuring the integrity and quality of providers through setting standards and requirements/benchmarks for achieving registration and re–registration. Both regulators have the authority to issue suspensions and cancellations to ensure quality and integrity. Neither the entire tertiary education sector nor the entire independent sector should be subject to the same constraints and regulatory burden that should be focussed on targeting the providers that are actually doing the wrong thing. It should consider the diverse landscape of providers and tailor integrity measures accordingly and specifically. We note that of over 1400 registered Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) providers, only 34 letters have been issued under the ESOS Act.

## ALLOCATION OF INTERNATIONAL STUDENT ENROLMENTS

*Part 7 of Schedule 1 to the Bill will enable the Minister for Education to make a legislative instrument specifying the number of overseas students that may be enrolled with a class of providers (total provider enrolment limit) and the number of overseas students that may be enrolled in courses or classes of courses at providers (course enrolment limit). Alternatively, the Minister can give a notice to a provider setting out its total provider enrolment limit or course enrolment limit. This would enable the Minister to set multiple enrolment limits for different courses for the one registered provider within the overall total provider enrolment limit. The Minister must obtain agreement from the Minister responsible for administering the NVETR Act (currently the Minister for Skills and Training), prior to setting limits for VET providers. Providers that exceed their enrolment limit will have their registration automatically suspended in relation to the courses covered by the enrolment limit. If a provider exceeds their course enrolment limit, they will be suspended for the courses that are covered by the course enrolment limit as specified in the legislative instrument or notice.*

*It is stated that this power will enable the Minister to proactively manage overseas student enrolments to deliver sustainable growth over time. In setting enrolment limits, the Minister will take into account the relevance of courses to Australia's skills needs. An additional consideration for the Minister when setting university limits will be the supply of purpose built student accommodation available to both domestic and international students.*

IHEA's approach to the allocation of international student enrolments

Under the proposed ESOS Bill, the Minister can impose an enrolment limit on:

- An education provider.
- A specified class of education provider.
- A specified course.
- A specified class of courses.
- A class of courses specified by reference to any matter, including course location.

The wide sweeping power the Bill bestows on the Minister is understandably concerning. As such, and in the absence of greater detail, IHEA is concerned that a regime for allocating international student enrolments will adversely impact independent higher education providers. As such, IHEA's position is to remain opposed to allocations of international student enrolments at a provider level, including to course level or linked to Australia's skills needs. Any allocations should only occur to redress the imbalance that has resulted through the recent visa processing outcomes, which has led to a very small number of public universities experiencing unprecedented growth in international students – at a time when independent providers are contracting. Rather than reduce international student numbers equitably and transparently, the Government appears to be protecting only a small number of elite universities, such as the University of Sydney where it has been reported that 32,800 international students are enrolled this semester, which accounts for 47 per cent of their student body. Further, between 2019 and 2023, there has been very strong growth VET, in which onshore international student enrolments increased by 16.5 per cent, during which time onshore international student enrolments decreased by 5.1 per cent in higher education. The Government now has the opportunity to correct this uneven growth and the issues they have caused.

However, in the event that provider wide allocations are implemented, IHEA proposes: (i) a transition period of more than 12 months, followed by a time–limited allocation of two years; (ii) maintaining 17.6 per cent of the independent higher education sector's share of international students; (iii) utilising 2019 international student enrolment data as a provider's base level; (iv) providing for 10 per cent growth; and (v) for allocations not to be linked to courses or for growth to be limited by linking it to the provision of purpose built accommodation. This approach will ensure that independent higher education providers are not subject to further, arbitrary reductions

in international student enrolments and ensure that independent providers are not left behind or disadvantaged in any allocation process.

Provider Registration and International Student Management System (PRISMS) data produced by DoE shows the percentage of onshore international student enrolments in non–government (independent) providers was 19.0 per cent of the total number of onshore international student enrolments in higher education providers in 2023 (143,651 out of 757,651). This percentage was 17.6 per cent in 2019 (140,640 out of 798,580), which is the year we are proposing to be the baseline in any allocation process. As such, it is recommended that independent higher education providers' share of onshore international student enrolments be no less than 17.6 per cent. Between 2019 and 2023, there has been very strong growth VET, in which onshore international student enrolments increased by 16.5 per cent, during which time onshore international student enrolments decreased by 5.1 per cent in higher education. These uneven growth patterns should be corrected and the model put forward by IHEA provides an opportunity to correct these issues.

IHEA maintains its strong position of opposing caps or other quotas/allocations of enrolments. However, recognising that both the Australian Government and Opposition are intending to implement them, the starting position for allocating international student enrolments should be as follows:

- The focus on allocation of international student enrolments should be to rein in recent growth of a small number of public universities. To date, the Government appears to have protected only a small number of elite universities, such as the University of Sydney where it has been reported that 32,800 international students are enrolled this semester, which accounts for approximately 47 per cent of their student body. Further between 2019 and 2023 onshore international student enrolments increased in VET by 16.5 per cent and decreased by 5.1 per cent in higher education. It is recommended that are–balancing student enrolments, including within the higher education sector, needs to occur without imposing a blunt allocation or quota on every CRICOS provider.
- Allocations should not occur at a local or jurisdictional level (as is occurring at the provincial level in Canada) and/or at a provider level. This would be restrictive and almost certainly disadvantage independent providers, which we are concerned will be disadvantaged compared to public universities in terms of receiving quotas. Further, directing students to study at, for example, regional universities, restricts their autonomy to study what and where they require and impacts their choice and disadvantages them.
- However, if the Australian Government pursues allocations for every provider, the criteria should be as follows for independent higher education providers:
    - Any arrangements for allocations should build in a transition period of more than 12 months to allow the sector to adjust and to re–set through revising their business and strategic plans. This will be critical for planning purpose, as well as the management of forward enrolments, without the risk of provider default or breaches to enrolment contracts, which may result in possible legal action from both students and agents.
    - Any arrangements for allocations should build in a transition period of more than 12 months to allow the sector to adjust and to re–set through revising their business and strategic plans. This will be critical for planning purposes.
    - During this period (of more than 12 months), the focus should be on correcting and addressing where growth in student enrolments has occurred in a small number of public universities by allocating – or restricting – enrolments to these specific providers.
    - The period that the allocations last for should be temporary and time–limited to up to two years, and should cease at the end of this period.
    - The independent higher education sector maintains its share of onshore international student enrolments at 17.6 per cent, which reflects recent full year percentages.

- Each independent provider is no worse off than they were in 2019, which should be their baseline allocation. For higher education providers that were registered after 2019, other, more recent arrangements will need to be put in place.
- Allocations should not be at a course level.
    - However, if this is a fait accompli, it is essential that allocations be applied only to future enrolments so that current enrolments that commence prior to the 1 January 2025 commencement date are sequestered (i.e. grandfathered), and that the pause on new courses excludes those already under review by the regulator at the time of the introduction of the legislation.
- Allocations should not be aligned to Australia's skills needs.
    - However, if this is a fait accompli, courses related to areas of skill shortage should be determined not by their field of education but by their learning outcomes since the associated field of education can be misleading when considering the perceived overlap among numerous narrow and detailed fields.
- Allocations should not be based on location.
    - However, if this is a fait accompli, such allocations should be informed by region–based skill shortages rather than a bias against Australia's three largest capital cities.
- A provision to grow up to 10 per cent over the period of the allocation (i.e. up to two years, which is the maximum period that the allocation should apply for).
- Growth should not be linked to the provision of purpose– built accommodation since very few independent providers do not have the resources to invest in and build such accommodation. This is in part due to not being beneficiaries of the generous government funding afforded to the public university sector.

IHEA is not supportive of the allocation arrangements without seeing the detailed plan for implementation and unless they address the actual problem. That is to control the significant growth of a small number of public universities, while most providers have experienced significant reductions in visa approvals which are adversely affecting student numbers. Unless corrected, the pipeline of students in future years is uncertain. This makes sensible business planning very difficult. A whole of sector response under the guise of integrity is not the answer. It also raises the question of how this proposed new regime will work with, or alongside, the CRICOS cap that all providers are allocated. Further clarity about this interplay will be vital for providers.

As raised in consultation on the draft Framework, schools, ELICOS and non–award sectors/courses should not be subject to any processes to manage growth and allocations of international student enrolments. These sectors often provide a valuable pathway for students to study higher education and/or VET qualifications. However, if higher education and VET are subject to the allocation of international enrolments, and schools, ELICOS and non–award are not, this could also cause some logistical issues. For example, some ELICOS courses are packaged with higher education or VET, which may cause misalignment between sectors that have allocated enrolments and those that don't. Further, in the schools sector unless the enrolment is linked to VET courses there is no guarantee of a continuing place studying at a higher education provider. The proposed strategy will result in a further demise of a valuable pathway to higher education.

This is another reason why IHEA believes there are significant issues with the proposed provider level allocation process, which if pursued, should be implemented according to the IHEA model using 2019 enrolments as the baseline.

## Alignment with Australia's skills needs

IHEA is concerned about – and opposed to – the overreach of directing international students to study courses that are aligned to Australia's skills needs, as opposed to the courses they want to study, which in many cases may instead pertain to areas of skill shortage in their home country. First and foremost, this diminishes student choice by aiming to direct students to study a particular course, and potentially in a location that is undesirable to them. The likely outcome of this is that students who can't study what they want in Australia will go to another country where they can study the course of their choice. The alternative is that the student will fail to complete their course of study, which may also lead to 'course hopping'. This impacts the students, providers and Australia's international education sector – further harming such a critical industry to Australia's economy.

The process for determining and allocating enrolments at a course level is also unclear. If this is a whole of sector response to rein in growth at a small number of public universities, then the strategy and its application should reflect this. Otherwise, it is concerning as to how a situation will operate. For independent providers, we are concerned that this will further impact their ability to enrol international students following a process of visa refusals that has already caused an uneven playing field.

Further, directing international students to study courses that align with Australia's skills needs presumes those students will ultimately work in those areas of skills need. This seems confusing given other policy settings. The withdrawing of the extra two years of post–study work rights is counter to providing avenues and opportunities for students to work in the areas of skills needs. Further, if those students exercise their right to return home, as the vast majority do at the end of their study, it is unclear what has been achieved by having forced these students to study the courses they did. Expectations may have been raised about a pipeline and supply of workers that ultimately does not materialise. Students who return to their home country should be able to study what they want and the proposed allocation down to course level would disrupt this, most likely through incentivising these students to study in a country other than Australia, to Australia's detriment. This will be significant as the economic benefit of the international education sector was $47.8 billion in 2023 and was responsible for a 0.8 per cent increase in Gross Domestic Product (GDP), which was more than half of the 1.5 per cent economic growth recorded.

There are other issues that would need to be addressed in terms of practicalities of aligning with Australia's skills needs. Teaching and nursing are traditionally occupations where there are skill shortages. Both of these professions have a practical component to the studying of a degree, with nursing requiring clinical training. In allocating practical and clinical placements to international students, who with few exceptions return home, this may be at the detriment of domestic students who will complete the qualification and pursue a career in their chosen field in Australia. This would be particularly problematic and exacerbate the skills shortages in such professions and/or have the effect of turning away international students to pursue their ambitions in a destination country other than Australia.

Directing international students to areas of skill shortages in Australia ultimately diminishes the limited efforts available to address skills needs, which should first be directed at domestic students. Driving international students into these places is unlikely to result in improved onshore capability in the years to come.

## Transition period

The Bill specifies that the Minister needs to set provider enrolment limits and course enrolment limits by 1 September to take effect from 1 January in the year immediately following. The exception to this is 2025, for which the Minister has until 31 December 2024 to set the limits. Given the planning, recruitment and certainty required by providers and students, 1 September is quite late to be putting limits in place and the day before, in the case of 2025, is totally unworkable and sends a very negative message to the sector. While IHEA is opposed to the setting of limits, if this is to occur, sufficient time needs to occur before the limits take effect, especially as there are significant penalties for breaching the limits. A transition period of more than 12 months is appropriate for the first year, with timing for setting limits in future year(s) to be developed in consultation with all of the

international education sector, with a view to limits being set by no later than 1 July in the preceding year.

IHEA's view is that the arrangements should be time–limited to a period not exceeding two years and settings need to be able to be corrected within that time if adverse and unintended outcomes are occurring. After two years, we believe that the balance in the international education market should have been restored.

## Legislative instrument and notices

In addition to tabling a legislative instrument to set provider limits, the Minister for Education can give a notice to a provider setting out its total provider enrolment limit or course enrolment limit. It is stated that this would enable the Minister to set multiple enrolment limits for different courses for the one registered provider within the overall total provider enrolment limit. IHEA's concern with this approach is that it lacks even greater transparency and raises the question as to why two separate processes or mechanisms are in place to ostensibly achieve the same outcome. We concede that the issuing of a notice would allow the Minister to directly and specifically address the growth in international enrolments that a small number of public universities have experienced during 2024 without imposing limits on every provider. If this is the intent of how a Minister will issue a notice, we would support it to rein in the growth of a small number of providers to re–balance international student enrolments.

Caps made by legislative instrument must be tabled in Parliament and can be disallowed, whereas a specific notice is not a legislative instrument and not subject to any disallowance. As such, further detail and transparency is needed about the different processes, which can be utilised to ostensibly achieve the same outcome.

## Intersection with the Department of Home Affairs and visa processing

Furthermore, it is clear that the Government's intention going forward is to use Ministerial discretion in placing enrolment limits on providers to control international student numbers. This is a changed approach to what we have seen since the Migration Strategy was released on 11 December 2023, whereby wide scale visa refusals were the vehicle for reducing international student numbers. As such, it will be important to ensure that DoE and the Department of Home Affairs work together to ensure connectedness in the approach to international student numbers. If management of international student numbers is to be through the allocation of/limits to enrolments for every CRICOS provider, Home Affairs will need to step back their approach of blanket visa refusals, which would be unnecessary in a system under the control of the Education Minister.

Greater transparency and understanding is needed about how visa processing, as well as the designation of Evidence Level (EL) risk ratings for providers and Assessment Level (AL) risk ratings for source countries of international students, will work alongside provider wide allocations of enrolments. There is a question as to whether the proposals in the ESOS Bill will render EL and AL ratings superfluous. Irrespective, it is critical to ensure that decisions are made in harmony and do not create a doubling of measures that are adverse for students, providers and Australia's international education sector.

## Fixing the actual problem

IHEA is concerned that independent providers will be adversely impacted by the measures outlined in the proposed Bill. Independent providers enrol approximately 15 per cent of the international education market. However, this is likely to be less based on recent visa processing arrangements that have skewed the distribution of students. Some public universities have further, and significantly, grown their international enrolments from the highs of the 2023 numbers. This has occurred while many providers, including independent providers, are experiencing significant reductions, that will lead to job losses and potentially provider closures. Any capping regime needs to specifically focus on the public universities that are growing their enrolments.

Linking international students to housing shortages and rental unaffordability is misleading, especially when it pertains to international students enrolled at independent providers. A recent report by the Property Council has challenged the notion that international students are the cause of the nation’s housing shortage. In summary, international students make up only four percent of Australia’s rental market and other long term structural

issues within the housing market are the principal causes of shortages. As such, it is a significant risk, and a somewhat unjust correlation to link student numbers to housing, as there are many factors that have impacted the housing market.

With this in mind, a focused response to the application of caps needs to be applied and independent higher education providers, with their relatively small, and declining percentage of international enrolments should not be further punished.

### Implementation

IHEA notes that imposing enrolment limits, including down to the course level, represents a significant challenge and workload for both the Government and DoE, unless it is an approach that will be used sparingly for a small number of public universities that have grown their student numbers significantly during 2024. Caution and due consideration needs to be applied to these processes, which needs to be developed in consultation with the international education sector, including independent higher education providers, to ensure that a rushed implementation does not lead to further impact on students and providers as well as damage to Australia's international education sector.

### Right of review

There is no general right of review on the merits of determining providers' international enrolment caps. However, the Minister's decision could be appealed through judicial review on some specific grounds, such as whether the discretionary power was exercised without regard to the merits of a particular case. While this puts a level of responsibility on the Minister, it puts the onus on ensuring a fair outcome on the provider. Undertaking a judicial review is costly and time consuming to reach an outcome, all the while the Minister's original decision has been in place. We believe a fairer outcome is to build in the rigour and equity upfront. This can be achieved through consultation, a period of transition, and as outlined above specific actions to fix the actual problem.

## SUSPENSION OR CANCELLATION OF COURSES

*Part 8 of Schedule 1 of the Bill enables the Minister for Education to make a legislative instrument specifying certain courses that will be automatically suspended and cancelled. The Minister for Education must obtain agreement from the Minister responsible for administering the NVETR Act (currently the Minister for Skills and Training), prior to making an instrument that includes VET courses.*

*It is stated that the Minister may specify classes of courses if satisfied that there are systemic issues in relation to the standard of delivery of the course, or the courses provide limited value to Australia's skills and training needs and priorities, or if it is in the public interest to do so.*

IHEA has significant concerns about the proposed amendment for reasons stated elsewhere in this submission, specifically under 'Allocation of international student enrolments at a provider level'.

Prescribing the courses that international students can study and which providers are able to offer those courses, does present as a deep micromanagement of the international education system. As previously mentioned, the approach will almost certainly drive students to study what they want at a destination country other than Australia, to Australia's detriment. History shows that even if international students do study courses that are aligned to Australia's skills needs, the vast majority will return home at the end of their study. They will, however, have taken a practicum (i.e. teaching) or clinical placement (i.e. nursing) that a domestic student could have taken up to subsequently work in the area of skills shortage.

In terms of cancelling courses, under the proposed ESOS Bill, the Minister can cancel registration for a course or classes of courses if:

- There have been systemic issues in the standard of delivery in the course.
- 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.

While the Minister must consult with TEQSA and the Secretary of DoE in making such a determination, there is no requirement to consult higher education providers. Although TEQSA is to be consulted, such an arrangement has the potential to undermine TEQSA, which has registered the provider and accredited the delivery of the course. This may lead to a situation where a course is suspended for new international students but remains registered with TEQSA for domestic students – such differentiation is confusing and discriminatory. The lack of transparency around decision making and the absence of a right of appeal is deeply concerning.

.Examples of 'systemic issues' have been stated as including:

- The completion rates of overseas students in these courses and the number of transfers to and from the course.
- Courses that are exclusively delivered to overseas students, excluding ELICOS courses and Foundation programs.
- Low–cost courses which are susceptible to use by non–genuine providers and students as a channel to work and extend their time in Australia. For example, the Joint Standing Committee on Foreign Affairs, Defence and Trade's interim report, Quality and Integrity – the Quest for Sustainable Growth: Interim Report into International Education identified that 'VET Business Leadership and Management' courses are generalist in nature and do not address Australia's skill needs.

However, these are only examples and the definition of 'systemic issues' is not restricted to these areas. Criteria for determining "systemic issues" will be critical to ensure clarity and understanding for students and providers. Similarly, how 'public interest' is defined will be critical. Such categorisation is vague and creates unlimited discretion and authority to the Minister, without providing appropriate clarity. We are concerned that under such

an unclear and general term, there is great scope for this authority to be misused.

The unilateral determination by the Minister of courses or classes of courses not to be offered is currently vague and lacks transparency and accountability. It raises the question as to the process and consultation that will be undertaken to support any such decision. It is imperative that this process be outlined, so that comprehensive consultation occur with the international education sector. However, as previously stated, IHEA's view is that to link courses of study to Australia's skills needs is significantly fraught and we strongly oppose such an approach, including the cancellation of courses.

## Who We Are

Independent Higher Education Australia Ltd. (IHEA) is a peak body established in 2001 to represent Australian independent (private sector) higher education institutions. Our membership spans independent universities, university colleges and other institutes of higher education, all of which are registered higher education providers accredited by the national higher education regulator, TEQSA or associate members seeking registration.

Our Vision is that: students, domestic and international, have open and equitable access to world class independent higher education in Australia, built on the foundations of equity, choice, and diversity.

Our Mission is to represent independent higher education and promote recognition and respect of independent providers as they contribute to Australian education, the Australian economy, and to society in general. We achieve this by promoting continuous improvement of academic and quality standards within member institutions, by advocating equity for their staff and students, and by delivering services that further strengthen independent providers' reputations as innovative, sustainable, and responsive to the needs of industry and other relevant stakeholders in both higher education and VET. IHEA's commitment is to excellence, productivity and growth in independent higher education being delivered through a trusted Australian education system underpinned by equity, choice, and diversity.

IHEA members have different missions, scales, and course offerings across the full AQF range (Diplomas to Doctorates). Members comprise:

- Four private universities (Bond University, Torrens University, University of Divinity, Avondale University).
- Five University Colleges (Alphacrucis University College, Moore Theological College, Australian College of Theology, Sydney College of Divinity and SAE Institute).
- Six self–accrediting institutes of higher education (Griffith College, Kaplan Business School, Marcus Oldham College, Excelsia College, The College of Law, and the Australian College of Applied Professions).
- Seventy four not–for–profit and for–profit institutions of higher education; and related corporate entities.

IHEA members teach approximately 74 percent of the students in the independent sector (i.e., more than 130,000 students) and educate students in a range of disciplines, including law, agricultural science, architecture, business, accounting, tourism and hospitality, education, health sciences, theology, creative arts, information technology, and social sciences.

IHEA holds a unique position in higher education as a representative peak body of higher education providers. Membership in IHEA is only open to providers registered with the Australian regulator – TEQSA. However, some IHEA members are dual and multi–sector providers who also deliver VET and/or English Language Intensive Courses for Overseas Students (ELICOS) courses.

**Contacts:**

The Hon. Dr. Peter Hendy
Chief Executive Officer
Email:
Phone:

Dr James Hart
Policy and Research Manager
Email:
Phone: