



# Submission to legislation review of Education Services for Overseas Students Amendment (Quality and Integrity) Bill 2024<sup>1</sup>

30 June 2024

## INTRODUCTION

Monash University is unique in the Australian higher education sector for its international profile. In the first decade of its establishment (in 1961), Monash became one of the major destinations for international students coming to Australia under the Colombo Plan. Since then, it has remained deeply engaged in international education, and is very proud of alumni across the Indo-Pacific and beyond.

For over 25 years Monash has pursued a sophisticated and integrated approach to international education - within Australia and across the Indo-Pacific - inclusive of international students enrolled at Australian campuses, a committed diversification strategy, investment in the establishment of campuses across the region, scalable programs for Australian-enrolled students to study in the region, deep transnational education, and research partnerships - all in the Australian national interest.

Monash pursues excellence to create positive benefits for society and our communities around the world, in Australia and across our network of international campuses in Malaysia, Indonesia, India, China, and Italy<sup>1</sup>.

- In 2023 Monash University enrolled 77,500 students in Australia (64% domestic and 36% international), nearly 10,000 (including over 500 doctoral students) at the Malaysia campus (established in 1998), and smaller numbers in Suzhou, Jakarta and Mumbai.
- All campuses are research intensive and offer postgraduate education, and Monash Malaysia also offers undergraduate education.
- The quality and scale of international education and research offered in Australia is critical to the success of our international campuses.
- For some years Monash has pursued a strong international student diversification strategy.
- For Monash, and likely many other institutions, total onshore international enrolments have not yet returned to pre COVID levels. This continues to have a significant effect on revenue and university budgets.

Given Monash's history, scale and footprint, we have significant experience in the practical operation of the ESOS Act. This knowledge forms the basis of our response and some proposed amendments to the Bill. These are explained and described in the following pages, to assist the Committee to make recommendations that will ensure that the final form of the Bill will achieve the stated policy objectives, while avoiding predictable and undesirable consequences.

I would welcome the opportunity to engage directly with the Committee about the likely consequences of this bill on Monash's operations, and Australia's higher education system.

Professor Sharon Pickering  
Vice-Chancellor and President  
Monash University

*Monash University recognises that its Australian campuses are located on the unceded lands of the people of the Kulin Nations, and pays it respects to their Elders, past and present.*

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<sup>1</sup> Refer to supplementary material for additional information about Monash's footprint and operations.

## KEY POINTS

Monash University is deeply concerned about the future direction of Australia's international education sector as set out in the *Draft International Education and Skills Strategic Framework* (the Framework), to be implemented in part through this Bill<sup>2</sup>. The Bill covers higher education (comprising about 50 universities and university colleges), government vocational education and training (VET) (mostly TAFES), and other VET providers (about 1,400 private training providers). While in various ways the Bill does distinguish between the sectors, it nonetheless proposes extensive Ministerial powers for intervention into the operation of a leading Australian industry, which have the potential to cause stagnation or decline in the global demand for Australian university education.

The data for 2019-2024 provide clear evidence that the greatest risk for migration policy resulting from international education lies overwhelmingly in the non-government sector. Over this period, enrolments in the non-government VET sector increased by 54 per cent or 79,544 students, whereas enrolments in the public university sector increased by just 7 per cent or 20,752. These figures indicate where the legislation should be focused to achieve 'sustainable growth'.

### International enrolments in Australian higher education and vocational education and training, March YTD

Provider type	Enrolments		Change	
	2019	2024	No.	%
Government universities	294,083	314,835	20,752	7.1
Non-government universities	8,555	10,172	1,617	18.9
Government VET	11,435	8,368	-3,067	-26.8
Non-Government VET	148,008	227,552	79,544	53.7
Government Higher Ed + VET	309,447	326,247	16,800	5.4
Non-Government Higher Ed + VET	207,719	301,659	93,940	45.2
All Higher Ed	357,723	391,986	34,263	9.6
All VET	159,443	235,920	76,477	48.0

Source: *Austrade International Education Data*, registered-user content, updated 24/5/2024

The Bill introduces false equivalences of risk, value and regulation between the government and non-government sectors, that pose an unacceptable threat to the national interest.

**The government sector should not be elided with the non-government sector as the profile and risks associated are qualitatively and quantitatively different.**

**For example, as it stands now, a one year Certificate of Marketing and Leadership delivered by a private provider is 'counted' and considered as the equivalent of a Masters of Clinical Embryology delivered by Monash University (where IVF was invented) when clearly the value to Australia and the integrity risks are not comparable.**

Where there are concerns with any particular public provider, they should be dealt with directly with that provider.

We support amendments to address quality and integrity matters, if they are targeted towards the root cause - mostly unscrupulous agents and providers operating in the private VET sector, whose conduct is undermining the quality and reputation of Australian education.

- Universities are comprehensively regulated through an existing system of legislation and frameworks that governs registration and accreditation for both providers and the courses they offer.
- In addition, the *Migration Act* and instruments under it form an important regulatory regime that applies to international students.
- We note that since new regulations were introduced to improve the integrity of the student visa system, Monash University has seen no change in its visa refusal rate.

<sup>2</sup> Refer to supplementary material for Monash's submission in response to the *Draft International Education and Skill Strategic Framework*



We acknowledge that to achieve 'sustainable growth' of international student enrolments at universities, a certain degree of national planning is necessary.

**The economic, social, and geopolitical significance to Australia (and individual states and territories) of international education should be the paramount considerations in determining the overall level of international students in Australia. This should involve a matrix of considerations, not just a number or proportion of students.**

- For reasons of simplicity and efficiency, any Government concerns regarding the overall international student profile or quality of a particular university should be resolved directly through dialogue with the relevant provider, within the existing regulatory framework for universities and negotiation of mission based compacts. Mission based compacts are the most appropriate and efficient mechanism for the Government and individual universities to negotiate the shape and profile of the student body. This approach would achieve the desired outcome of sustainable growth and avoid inadvertently diminishing the value of international education to the Australian economy and community or adversely affecting high quality providers that are meeting regulatory and societal expectations.  
**To our knowledge the Government has not attempted to use these existing mechanisms and processes to achieve its current aims to manage student growth - this process should be used and exhausted before resorting to blunt legislative or regulatory instruments, considering the importance of the sector to state and national interests.**
- We note that this Government and the Parliament have acted decisively to restore transparency and independence into policy making and to reduce ministerial interference in decision making by the Australian Research Council, both in the introduction of a new independent Board and Chair, and by reducing the capacity for ministerial veto of grants.
- We do not support amendments to introduce unprecedented and unrestricted Ministerial powers to intervene in the operations of universities in a way that could in the longer term produce unpredictable and deleterious consequences for the nation.

The ESOS Act is complex, and changes require careful consideration. The development of the changes in the Bill has been rushed. Universities require a careful and considered framework to remove uncertainty and enable them to undertake crucial long term planning. The consultation period for the draft Framework has only recently closed. and yet this legislation has been introduced before the final Framework is settled.

**Accordingly, we urge the Committee to recommend that any application of the Bill to universities should be deferred to 2026 to avoid unintended consequences.**<sup>3</sup> The next pages contain suggested amendments to focus the Bill towards the policy goals.

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<sup>3</sup> We note that in October last year, the *Higher Education Support Act* was amended to include the new Support for Students Policy before consultation on the new policy occurred. This undesirable process resulted in subsequent changes to the start date of key aspects of the policy in the legislation and other issues relating to reporting that are still to be resolved.



## PROPOSED AMENDMENTS TO THE BILL

### 1A EXEMPT UNIVERSITIES FROM ENROLMENT LIMITS

Insert a definition in section 5 of the principal Act of a 'Table A provider' and 'Table B provider' as per s.16-15(1) of the Higher Education Support Act 2003.

Amend the Bill so that the Minister may only set a total enrolment limit or a course enrolment limit, on the number of overseas students for registered providers that are not Table A providers or Table B providers as defined, by excluding such providers from the operation of proposed ss.26B(1), 26C(1), 26E(1), and 26F(1).

Concerns regarding the overall international student profile or quality of a Table A or Table B provider under the *Higher Education Support Act* should be resolved through clear reference in the proposed ESOS Act amendments to the existing legislative and regulatory mechanisms and broader government processes. For reasons of simplicity, and efficiency, national planning to achieve sustainable growth of international student enrolments at public universities will be most effective through direct reference in the ESOS Amendment Bill to the existing regulatory framework, including requiring the negotiation of mission based compacts to include targets for international student enrolments.

**Inserting legislative reference to mission based compacts and sustainable growth is the most appropriate and efficient mechanism for the Government and individual universities to negotiate the shape and profile of the student body. This approach would achieve the desired outcome of sustainable growth and avoid inadvertently diminishing the value of international education to the Australian economy and community or adversely affecting high quality providers that are meeting regulatory and societal expectations.**

It would also be in line with community expectations about regulatory power and protect against unpredictable use of direct ministerial control in the longer term.

Guidance on international student enrolments in mission-based compacts would assist the Minister to set enrolment limits for other providers so that overall international student enrolments are consistent with Government policy settings for Net Overseas Migration and population growth.

Amend the Bill so that a mission based compact (within the meaning of Higher Education Support Act, s.19-110(3)) for a Table A provider or a Table B provider must include a statement of the provider's strategy for enrolling international students and its target levels of enrolment for international students.

This would require an amendment to the Higher Education Support Act 2003, s.19-110(3) , for example,

(3) The mission based compact must include:

...

(f) a statement of the provider's strategy and target levels for enrolling international students.

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OR

### 1B IF UNIVERSITIES ARE NOT EXEMPTED FROM ENROLMENT LIMITS, DELAY AND SUNSET THE SETTING OF ENROLMENT LIMITS ON UNIVERSITIES

If universities are not exempted from the enrolment limits provisions of the Bill, then in light of the limited analysis and consultation that has been undertaken prior to the imposition of enrolment limits, and because the adverse effects for Australia are likely to be largest for limits to enrolment at public universities, it would be appropriate to delay the imposition of enrolment limits on public universities until 2026, and to sunset their application at the end of 2027, pending a review of the impact in 2026 (a mechanism for requiring review of enrolment limits is suggested at [5]).



**The introduction of any enrolment limits for public universities in 2025 would be entirely unworkable. There would be less than six months from passage of the Bill to the intended implementation date. No other major industry, let alone the leading export industry of Victoria, the second largest industry in NSW and SA and the fourth largest national industry, would be subject to such rushed legislative changes with such far reaching economic consequences.**

Monash University has already offered places to international students to commence in 2025 in an entirely orderly, diversified and appropriate way. Imposing an enrolment limit at this late stage would create a substantial risk that Monash University would be forced to turn away particularly high-performing students in order to both honour existing offers and ensure compliance with enrolment limits.

Such rushed implementation would affect every aspect of the University's operations, with significant and lasting impacts for the quality of education, research and innovation for the nation.

[Amend the Bill so that the Minister may only set a total enrolment limit, including a tolerance \(refer below\), but not a course enrolment limit, on the number of overseas students for registered providers that are Table A providers, for commencing students only for the 2026 and 2027 calendar years \(but not for subsequent years when responsibility should reside with the Australian Tertiary Education Commission\).](#)

## 2 TOLERANCES FOR EXCEEDING LIMITS

The Bill effectively sets enrolment limits as 'hard caps'. The consequences for breaching an enrolment limit would be severe: the provider would be prevented from enrolling any additional overseas students for the course that year, and could not accept deposits from students seeking to enrol in the course for future years (cl.96 and 96A).

However, it is difficult for providers to manage international student enrolments with precision. International recruitment involves long lead times. Providers often make 'packaged' or 'conditional' offers which can include pathways for language and other prerequisites. Not all offers are converted to acceptances, and not all acceptances are converted into admissions. It is inherently impossible for a provider to forecast conversion rates precisely.

Consequently, providers would be forced to aim for substantially lower enrolments than the point at which penalties would apply in order to allow for these uncertainties. If enrolment limits were set to produce an optimal balance between the value of international students and the consequences of migration flows, penalties should only apply if these limits were materially exceeded, so that providers could treat the limit as a "target" rather than a "hard limit", that is, there should be a tolerance to account for the imprecision of load planning and unpredictability of conversion rates.

[Amend the Bill so that obligations relating to limits on total enrolments on the number of overseas students only apply if the relevant limit is exceeded by an amount that is clearly beyond a tolerance for load management.](#)

## 3 CONSULTATION OVER PROPOSED LIMITS

Enrolment limits for universities would likely have a range of undesirable consequences. International fee revenue contributes substantially to a wide range of university operations: it covers gaps between Jobs Ready Graduate funding and the cost of course delivery for domestic students; it supports provision of learning and teaching infrastructure; it contributes to research funding and infrastructure; and it enables strategic investment in transnational education. International student revenue also contributes to the fixed costs of course offerings, and provision of amenities. Changes to international enrolment numbers would affect all aspects of the university.

Very substantial impacts are plausible. Recent changes in the UK have led to a 63 per cent fall in deposits from international post-graduate students.<sup>4</sup> And changes in Canada's policy toward international students, including a planned 35 per cent reduction in post-

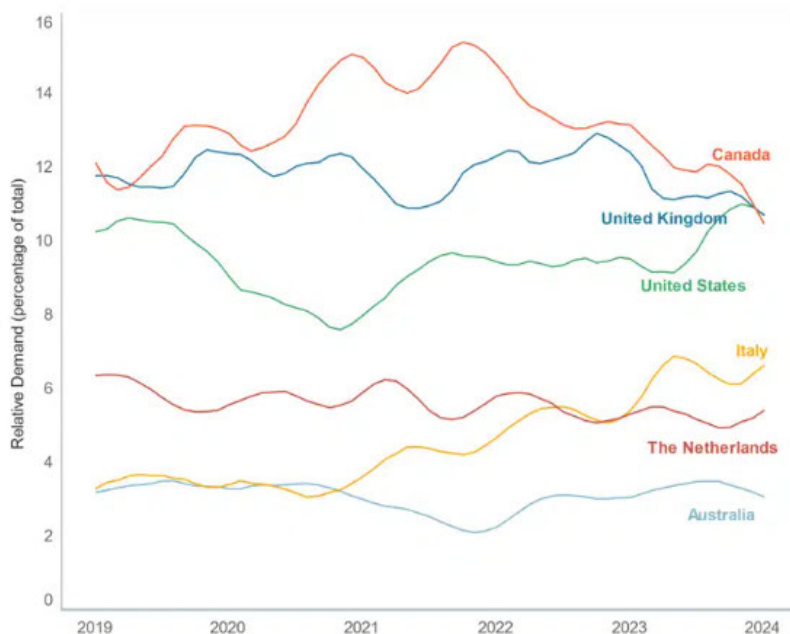
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<sup>4</sup> Migration Advisory Committee (2024), *Rapid Review of the Graduate Route*, <https://assets.publishing.service.gov.uk/media/6641e1fbbd01f5ed32793992/MAC+Rapid+Review+of+Graduate+Route.pdf>



secondary international student study permits, has resulted in Canada dropping from first to fourth country of choice for international students.<sup>5</sup>

Recent information aggregated by ICEF Monitor<sup>6</sup> indicates that international student demand for study in the UK, Canada and Australia is already dropping dramatically, with almost 50 per cent of potential students in a recent IDP survey considering study elsewhere; page searches by Studyportals show a sharp drop in interest in Canada and more recently the UK:



Demand for bachelor's and master's programmes in 6 study destinations, 2019-2024. Source: Studyportals

Cited in: <https://monitor.icef.com/2024/02/demand-for-study-abroad-in-australia-canada-uk-already-affected-by-new-international-education-policies/>

Because of this range of impacts, the consequences of constraining international fee revenue might not be transparent to the Minister. Consequently, it is reasonable to require that the Minister consult with the provider before setting a limit (with the associated tolerance).

[Amend the Bill so that it is mandatory for the Minister to consult with a Table A provider or Table B provider before setting \(whether by legislative instrument or written determination\) an enrolment limit \(with associated tolerance\) that will apply to that provider.](#)

#### 4 DECISION CRITERIA FOR LIMIT SETTING

As discussed in the previous section, enrolment limits would have a very significant impact on the financial outcomes for a university and the Australian economy. The Bill has no constraints on the Minister's power to set limits – the Minister could reduce a provider's permitted international student enrolment to zero. The Bill also provides no criteria for the exercise of the Minister's power.

Given the extent of these powers, it is appropriate for the legislation to set criteria and principles for the exercise of the Minister's powers to set enrolment limits (with the associated tolerance) and that this should be done through negotiation.

<sup>5</sup> <https://careers.idp.com/news/us-takes-pole-position-international-students>

<sup>6</sup> <https://monitor.icef.com/2024/02/demand-for-study-abroad-in-australia-canada-uk-already-affected-by-new-international-education-policies/>

Amend the Bill so that in determining a Table A or Table B provider's total enrolment limit, or the way in which such a limit is expressed or applied, the Minister or delegate must consult with the provider about all relevant considerations, including but not limited to

- Whether there are reasons to believe that the provider might be at risk of not complying with any of the Higher Education Standards Framework (Threshold Standards) 2021
- The overall level of quality of international student demand for the provider's courses
- The provider's overall international profile, including offshore enrolments and trans-national education arrangements
- The likely contribution to Australia's economy and society of the students likely to enrol
- The outcomes of any other discussions between the provider and the Minister or the Minister's agents or delegates
- The impact, including the financial impact, of the limit on the mission of the provider
- The impact of the limit on the provider's overarching approach to international education.

## 5 EXCLUSIONS

It is appropriate to exclude some international students from the calculation of enrolment limits, either because they are likely to be particularly high value to Australia's economic, international, or social goals, particularly high value to institutional mission, or relatively limited in their impact on migration and population growth. While the case for some exclusions is clear, there is also a need for consideration of these and other potential exclusions in greater detail.

Post-graduate research students tend to be particularly high value because they contribute to the research effort, and are typically selected because they are towards the top of their field. Students who are part of a transnational articulation agreement tend to have a significant impact on international relations. Inbound exchange students who study in Australia for less than 12 months have less impact on population growth because they do not stay for employment after completing their course. Similarly non-award courses for less than 6 months have a relatively small impact on population growth (and we note that the Australian Bureau of Statistics does not count them in its definition of Net Overseas Migration).

If such students are not excluded, providers may enrol students who are relatively lower value to Australia, or who have a relatively larger impact on population growth.

While such students might be specifically excluded from particular Ministerial determinations, it would simplify administration and add to transparency if the legislation excluded several classes of students from all limits.

We note that there is no need to exempt humanitarian students from enrolment limits because holders of a permanent resident humanitarian visa are not considered overseas students.

Amend the Bill so that certain categories of overseas students are not counted within total enrolment limits, including but not limited to situations where

- The student is enrolled in a higher degree by research course
- The student is part of a transnational articulation agreement between an Australian Table A or Table B provider and a foreign university
- The student is an inbound student (either enrolled to study in a course primarily provided at the offshore campus of an Australian Table A or Table B provider or the offshore campus of a non-Australian provider), and the student is taking part in study abroad in Australia for less than 12 months
- The student is enrolled to study in a non-award course that will not involve them studying in Australia for more than 6 months, or
- The student is from a country or studying a course that the Minister deems to be excluded.

## 6 INSTRUMENTS FOR SETTING LIMITS

Ministerial powers to intervene in a global competitive market, in a way that could have critical consequences for a provider's financial viability, with relatively limited criteria for their exercise, should be subject to suitable checks and balances. Basic principles of accountability require a high degree of oversight for such substantial powers. Given the extent and impact of the powers,

enrolment ranges should only be set through a disallowable legislative instrument. If Ministerial determinations are empowered, they should be accompanied by an explanation and be subject to review on the merits by the Administrative Appeals Tribunal.

#### 6.1 Legislative instrument only, with Disallowance by Parliament

Amend the Bill so that the Minister's determination of a total enrolment limit for a Table A or Table B Provider, can only be by a legislative instrument [not by ministerial determination] that may be disallowed by either House of Parliament.

or

#### 6.2 If Ministerial determinations are maintained, provide for Administrative Review

Amend the Bill to clarify that the Minister's determination of a total enrolment range imposed by a written notice given to a registered provider is a Reviewable decision (as defined by Division 2 of the Education Services for Overseas Students Act 2000) so that

- the Minister must provide a written notice containing the terms of, and reasons for the determination
- the registered provider may apply to the Administrative Appeals Tribunal for a review of the determination.

## 7 REVIEW

Enrolment ranges could have very great impacts on higher education providers and the Australian economy. These impacts have not been substantially analysed before this legislation was introduced. Consequently, it would be appropriate to review the actual impact of enrolment limits as soon as there has been sufficient time for evidence to accumulate so that the regime can be amended in the light of experience.

The Bill's Explanatory Memorandum foreshadows for the integrity and quality aspects of the legislation a 'proposed Independent Evaluation Plan ... at a projected timeframe of six months, one year and two-years'. However, this evaluation would not consider enrolment limits, even though they might well have affected providers more in practice than the integrity and quality measures. An explicit legislative requirement to review the impact of enrolment limits would be appropriate.

Changes implemented as the result of any review are unlikely to be introduced any earlier than two years from the limits coming into effect. Two years is required for

- some evidence to accumulate
- time to conduct the review
- government to consider the review, and
- sufficient notice for whatever changes to the regime are desired.

On this basis, if enrolment limits (with associated tolerance) commenced in 2026, the review would be early in 2027 and changes implemented for 2028.

Amend the Bill to require a review of the impact of enrolment limits (with associated tolerance)

- The Minister must commission the review after enrolment ranges have been applied for more than 12 but not more than 18 months
- The Minister must commission an independent expert to conduct the review
- The expert must have access to information from the Department and providers to conduct the review
- The review must consider
  - The impact of enrolment limits on providers
  - The impact of enrolment limits on Net Overseas Migration to Australia and housing availability, and
  - The impact of enrolment limits on the quality of education offered to international and local students
- The Minister must table the review in both Houses of Parliament within 15 sitting days of receiving the review.





## 8 COMMISSIONS – CONFIDENTIALITY

Monash University has no objection to collection of information about agent commissions in order to maintain system integrity. However, Monash is concerned that the public release of this information could have the perverse outcome of increasing agent commissions.

- Universities already supply information to the Commonwealth about the agents they use and the number of students recruited through them. Students and universities alike have access to this information and can use it in decision making.
- Transparency doesn't necessarily lead to better outcomes, since not all providers have equal capacity to negotiate, because of either the volume of students they take or the size of the commission they pay. For example,
  - University A pays a 40% commission to Agent 1 and receives Agent 1's highest ranked students. University B pays a 20% commission and receives Agent A's middle ranked students. University B could increase its commission and receive a greater share of the top students, but would pass on the increased cost to the student in the form of a higher fee.
- If the Government believes there is market failure in agent commissions, it could set a commissions cap, or otherwise regulate. However, the consequences of this might result in agents sending their best students to other countries.

However, we understand that transparency of agent commissions was supported by other stakeholders during the 2022 ESOS consultation (discussed in Ch. 7 of the Impact Analysis included within the Explanatory Memorandum). If this occurs, it should be backed by explicit legislative provisions that are currently not included in the Bill.

Amend the Bill so that information about education agent commissions paid by a registered provider must not be made public in a form that allows the identification of the commissions (monetary or non-monetary) or the number of accepted students for any particular provider or education agent.

Amend the Bill so that the Minister may provide information about education agent commissions paid by a registered provider to any other registered provider which provides similar courses, on the condition that the information must not be made public in a form that allows the identification of the commissions (monetary or non-monetary) or the number of accepted students for any particular provider or education agent.

Amend the Bill to impose a penalty on a registered provider that makes public information about education agent commissions of any other provider in a form that allows the identification of the commissions (monetary or non-monetary) or the number of accepted students for any particular provider or education agent.

## SUPPLEMENTARY INFORMATION

### ABOUT MONASH

### MONASH SUBMISSION TO CONSULATION ON DRAFT INTERNATIONAL EDUCATION AND SKILLS FRAMEWORK



**MONASH UNIVERSITY** recognises that its Australian campuses are located on the unceded lands of the people of the Kulin Nations, and pays its respects to their Elders, past and present.



# MONASH IS A GLOBAL UNIVERSITY WITH A 60 YEAR LEGACY OF QUESTIONING, CHALLENGING AND DRIVING IMPACT

We have built a reputation for excellence in research, education and enterprise, with an international reach and a global and inclusive perspective.

Our commitment to creativity, innovation and making a difference truly sets us apart.

We are focused on empowering our people to make positive and lasting impact.

ESTABLISHED IN **1958**  
**347** UNDERGRADUATE  
STUDENTS COMMENCED IN 1961

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**+84,000**  
STUDENT ENROLMENTS IN 2023

# OUR GLOBAL FOOTPRINT



## CAMPUSES AND LOCATIONS

### ENTITIES NOT FULLY OWNED BY MONASH UNIVERSITY

- Alfred Medical Research And Education Precinct (AMREP), Alfred, Australia
- Biocurate, Parkville, Australia
- Hudson Institute of Medical Research, Clayton, Australia
- Monash Partners Academic Health Science Centre, Clayton, Australia
- Neurosciences Victoria, Parkville, Australia
- Bendigo Primary Care Centre, Bendigo, Australia
- Open Universities Australia, Melbourne, Australia

### INTERNATIONAL PARTNERS DELIVERING MONASH COLLEGE PROGRAMS OVERSEAS

- Jakarta International College, Jakarta, Indonesia
- Sunway College, Johor Bahru, Malaysia
- Universal College Lanka, Colombo, Sri Lanka
- Virscend Education, Chengdu, China
- Timespro, Mumbai, Delhi, India

### INVESTMENTS

- Monash Commercial, Clayton, Australia
- Monash Investment Holdings, Clayton, Australia
- Monash University Foundation, Clayton, Australia

### INTERNATIONAL STRATEGIC PARTNERS

- University of Warwick, Coventry, UK
- King's College London, London, UK
- Newcastle University, UK
- Pennsylvania State University, Pennsylvania, US
- University of British Columbia, British Columbia, Canada
- European Molecular Biology Laboratory, Heidelberg, Germany
- University of Padua, Padua, Italy
- Southeast University, Jiangsu (Province), China
- Indian Institute of Technology Bombay, Mumbai, India

### MONASH COLLEGE, MELBOURNE, AUSTRALIA



9  
CAMPUSES AND  
LOCATIONS ACROSS  
6 COUNTRIES

2  
CAMPUS  
PARTNERSHIPS

100+  
PARTNER UNIVERSITIES

84,884  
STUDENTS

18,234  
STAFF

490,000+  
ALUMNI COMMUNITY  
ACROSS 156 COUNTRIES

# OUR RANKINGS

**37**

QS WORLD  
UNIVERSITY  
RANKINGS 2025\*

**=37**

US NEWS AND WORLD  
REPORT 2022-23 BEST  
GLOBAL UNIVERSITIES\*

**87**

TIMES HIGHER EDUCATION  
WORLD REPUTATION  
RANKINGS 2023

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**54**

TIMES HIGHER EDUCATION  
WORLD UNIVERSITY  
RANKINGS 2024

**32**

TIMES HIGHER  
EDUCATION IMPACT  
RANKINGS 2024\*

**77**

SHANGHAI RANKING  
ACADEMIC RANKING  
OF WORLD  
UNIVERSITIES 2023

# TOP 50 UNIVERSITY\*

# OUR SUBJECT RANKINGS

**#2**

**PHARMACY AND  
PHARMACOLOGY**

– QS RANKINGS 2024  
(GLOBAL)

**#1**

**PHARMACY AND  
PHARMACOLOGY**

– QS RANKINGS 2024  
(IN AUSTRALIA)

**#1**

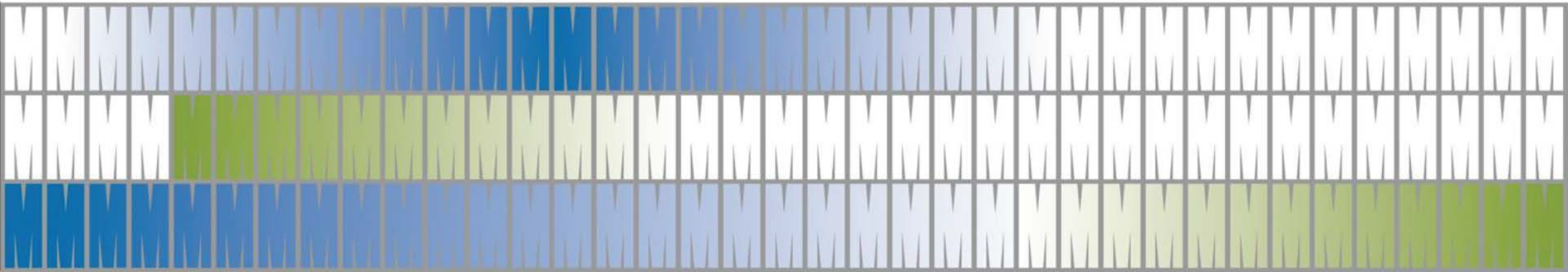
**COMPUTER  
SCIENCE**

– TIMES HIGHER EDUCATION  
RANKINGS 2023 (IN AUSTRALIA)

**#1**

**ENGINEERING**

– TIMES HIGHER EDUCATION  
RANKINGS 2023 (IN AUSTRALIA)



The further top ranked subjects globally are:

**RANKED IN  
THE TOP 50  
OF WORLD  
UNIVERSITIES\***

\*2022-23 US NEWS AND WORLD REPORT BEST GLOBAL  
UNIVERSITIES RANKINGS (=37TH) AND QS WORLD UNIVERSITY  
RANKINGS 2025 (37TH)

<b>17</b>	<b>ANATOMY AND PHYSIOLOGY</b>	<b>=17</b>	<b>MINERAL AND MINING ENGINEERING</b>
<b>21</b>	<b>NURSING</b>	<b>=23</b>	<b>PHILOSOPHY</b>
<b>=23</b>	<b>EDUCATION</b>	<b>=31</b>	<b>SPORTS RELATED SUBJECTS</b>
<b>=33</b>	<b>MATERIALS SCIENCE</b>	<b>34</b>	<b>DATA SCIENCE AND ARTIFICIAL INTELLIGENCE</b>
<b>34</b>	<b>CIVIL AND STRUCTURAL ENGINEERING</b>	<b>35</b>	<b>ACCOUNTING AND FINANCE</b>

QS WORLD UNIVERSITY RANKINGS BY SUBJECT 2024



# AREAS OF STUDY

Monash offers one of the broadest range of degree and double degree courses in Australia in the areas of:

- > ART, DESIGN AND ARCHITECTURE
- > ARTS, HUMANITIES AND SOCIAL SCIENCES
- > BUSINESS
- > EDUCATION
- > ENGINEERING
- > INFORMATION TECHNOLOGY
- > LAW
- > MEDICINE, NURSING AND HEALTH SCIENCES
- > PHARMACY AND PHARMACEUTICAL SCIENCES
- > SCIENCE

Australia's largest scholarship program:

**5148**  
SCHOLARSHIP  
RECIPIENTS  
IN 2022\*

**245**  
TYPES OF  
SCHOLARSHIPS  
AVAILABLE  
IN 2022\*

\* INCLUDES MONASH ABROAD GRANTS





# OUR RESEARCH VALUE

Monash has among the highest research revenues of any Australian University, totalling nearly:

**\$672M**  
TOTAL RESEARCH  
INCOMES

(HERDC - CATEGORY 1-4) 2022

**\$1.4B**  
INVESTED IN  
RESEARCH  
EACH YEAR

MORE THAN  
**161**  
ACTIVE FIELDS  
OF RESEARCH

**5700**  
HIGHER DEGREE  
BY RESEARCH  
STUDENTS

INFORMATION WAS CORRECT AT THE  
TIME OF PUBLICATION (MAY 2023)



# OUR ECONOMIC IMPACT

MONASH DIRECTLY  
ACCOUNTED FOR  
**\$5.74 BILLION**  
WORTH OF ECONOMIC  
ACTIVITY FOR  
AUSTRALIA IN 2022

WE DIRECTLY CONTRIBUTED  
**\$1.39 BILLION**  
TO AUSTRALIA'S  
GDP IN 2022

IN 2022, MONASH  
GENERATED  
**\$2.27 BILLION**  
IN EXPORTS

WE DIRECTLY SUPPORTED  
ALMOST  
**17,007**  
JOBS IN 2022

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**94**  
**SPINOUTS  
LAUNCHED**  
USING MONASH OWNED IP

**\$982M**  
**IN INVESTMENT**  
RAISED FOR  
MONASH SPINOUTS  
OVER THE PAST FIVE YEARS

**170**  
**COMPLETED  
LICENCED  
DEALS**  
OVER THE PAST FIVE YEARS

**33**  
**SPINOUTS**  
IN THE MONASH  
EQUITY PORTFOLIO

# MONASH TECHNOLOGY PRECINCT

The Monash Technology Precinct is an epicentre of inspired innovation, excellence in research and discovery, and a pipeline for talent creation at scale.

It is the heart of the largest hub for employment and innovation in Victoria, outside of the Melbourne Central Business District, and home to Australia's most significant and unique research and technology platforms.

It is more than a commercial hub; it's a liveable, connected precinct, a place where talented innovators, state-of-the-art infrastructure, industry leaders and the local community converge.



**20,000+  
BUSINESSES**

WHO LEVERAGE  
INNOVATION, PARTNERSHIPS  
AND WORLD-CLASS  
EDUCATIONAL FACILITIES



**\$11.5 BILLION**

INJECTED INTO THE  
VICTORIAN ECONOMY  
EACH YEAR, CREATING  
SIGNIFICANT NATIONAL  
AND GLOBAL IMPACT



**115,000 JOBS**

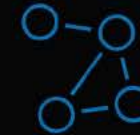
SUPPORTING THE NATIONAL  
ECONOMY AND VICTORIA'S  
INNOVATION ECOSYSTEM



**5000+ PHD  
STUDENTS**



**\$250 MILLION**  
CAPITAL EXPENDITURE  
PER YEAR



**40+**  
MONASH TECHNOLOGY  
RESEARCH PLATFORMS

# MONASH PRECINCT MAP

- R&D (MONASH UNIVERSITY RESEARCH EXPENDITURE \$1.1B / YEAR)
- INDUSTRY PARTNERS
- INTERMEDIARIES (INCL. INCUBATORS AND ACCELERATORS)
- AMENITIES
- TRANSPORT
- GOVERNMENT FUNDED PARTNERING INITIATIVES

The Precinct is the epicentre of the largest employment and innovation cluster outside Melbourne's Central Business District with

**13,000** businesses

over **90,000** jobs.

The cluster contributes over **AUD\$9.5 billion** to the economy each year (pre-pandemic).



# ADDRESSING THE CHALLENGES OF THE AGE

**Monash is recognised globally for its commitment to advancing climate change, actively contributing to peace and sustainable prosperity, and fostering thriving communities.**

We are addressing these challenges of the age, through excellent research and education, and through the strength and diversity of our staff, students and alumni, and in collaboration with our partners, for the betterment of national and international communities.

## 1

### CLIMATE CHANGE

Monash is delivering transformative knowledge, innovation and practice through our people, campuses and partners for catalysing the transition to net zero and tackling the devastating impacts of climate change on our planet.

## 2

### GEOPOLITICAL SECURITY

Monash is globally recognised for actively contributing to peace and sustainable prosperity through our research and education, and underpinned by our international network of campuses and partnerships

## 3

### THRIVING COMMUNITIES

Monash is working with the communities we serve to support their evolving and complex needs, and developing transformational solutions to ensure we can all live well together.

# OUR ENVIRONMENTAL AND SOCIAL IMPACT

Solving the global challenges of our age with research, education and enterprise.

Monash is focused on driving positive change in three of the most significant challenges confronting our age: climate change, geopolitical security and thriving communities. We amplify impact through our partnerships with Government at all levels, industry, philanthropists and community.

SINCE 2015,  
WE'VE CUT  
OUR ENERGY  
EMISSIONS  
INTENSITY BY  
**64%**

MONASH IS  
**32 GLOBALLY**  
FOR OUR CONTRIBUTION  
TO THE UNITED  
NATIONS SUSTAINABLE  
DEVELOPMENT GOALS\*

\*TIMES HIGHER EDUCATION IMPACT RANKINGS  
2024. FIGURES CORRECT AS OF MAY 2024.

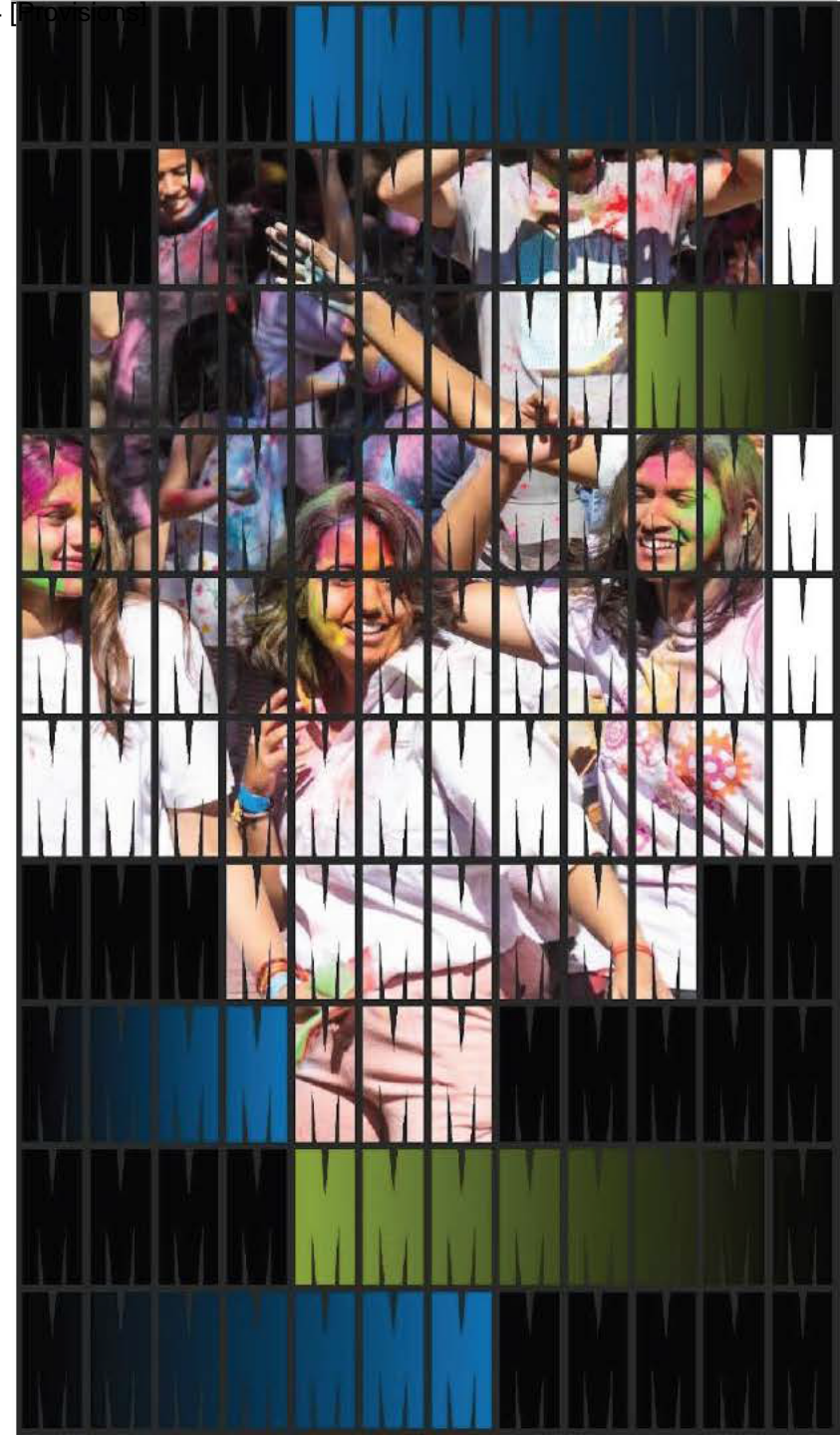
# OUR COMMUNITY

Our Clayton campus hosts events and open venues for community groups, sports clubs and schools all year round.

OUR VICTORIAN  
CAMPUSES DRAW  
MORE THAN  
**820,000**  
**VISITORS**  
EACH YEAR

WITH THE COMPLETION  
OF THE  
**\$56 MILLION**  
CULTURAL PRECINCT  
UPGRADE, VISITORS  
WILL GROW MORE THAN  
**1 MILLION**  
**PEOPLE**

FIGURES CORRECT AS OF 2019.



# Response: Draft International education & skills strategic framework

## ACKNOWLEDGEMENT OF COUNTRY

Monash University recognises that its Australian campuses are located on the unceded lands of the people of the Kulin Nations, and pays it respects to their Elders, past and present.

## KEY POINTS AND RECOMMENDATIONS

Monash University is deeply concerned about the future direction of Australia's international education sector as set out in the Draft International Education and Skills Strategic Framework, and about the likely consequences and timing of the proposed measures. Alignment of the sector with national goals is at risk if the draft Framework is adopted and implemented without substantial change. We are pleased to provide several recommendations for modification of the draft Framework.

For Monash, the direct consequences of the Framework as currently conceived would be the contraction or cessation of our ability to continue to deliver many initiatives that have been integral to becoming a top-50 university that provides world-class education, research and community development locally, regionally and globally.

These views are grounded in the nature of Monash. The University is unique in Australia for its international profile. Since the first Colombo Plan, the University has been deeply engaged in international education, and is very proud of alumni across the Indo-Pacific and beyond. Monash pursues excellence to create positive benefits for society and our communities around the world, particularly in the Indo-Pacific across our network of international campuses in Malaysia, Indonesia, India, China, and Italy.

- In 2023 Monash University had nearly 12,000 enrolled students in these offshore locations.
- All campuses are research intensive and offer postgraduate education, and Monash Malaysia also offers undergraduate education.
- The quality and scale of international education and research offered in Australia is critical to the success of our international campuses.
- For some years Monash has pursued a strong international student diversification strategy.
- For Monash, and likely many other institutions, total international enrolments have not yet returned to pre COVID levels. This continues to have a significant effect on revenue and university budgets.

Monash University welcomes the opportunity to engage in comprehensive discussions with Government and relevant departments regarding a 'managed system to deliver sustainable growth over time' and the leading contribution Monash plays in Australia and the Indo-Pacific.

### Recommendations

- Defer the implementation to 2026 to avoid unintended consequences associated with rushed development.
- Adopt a differentiated approach to integrity measures based upon risk assessment. Public providers, universities and TAFEs, should not be subject to the same measures as private providers as the integrity risks are simply not the same.
- Any limits on international student enrolments at universities should be made through negotiation with individual universities and be inclusive of each institution's overall mission and position - balancing its overarching approach to international education with domestic profile and financial imperatives. This should occur firstly as part of mission-based compacts, and subsequently through the Australian Tertiary Education Commission (ATEC).
- Do not introduce new Ministerial powers to set enrolment caps by course.
- Include a sunset clause in the legislation for the removal of Ministerial powers upon the introduction of the ATEC.





## INTRODUCTION

We agree that international students are more vulnerable in education decision-making than domestic students and welcome appropriately targeted measures to improve system integrity as being in the interests of the students, the market for international education as a whole, and the nation.

The draft Framework covers both higher education and vocational education and training (VET) providers. It does not however sufficiently differentiate between the distinct parts of the international education sector, which encompasses approximately 50 public and private universities and university colleges, another 30 government providers (mostly TAFEs) and 1,400 private training providers. It proposes extensive powers for interventions that run the risk of causing irreparable damage to a leading Australian industry that has taken decades to build, with consequent stagnation or decline in the global market for Australian university education.

Measures intended to resolve integrity issues should be directed towards providers whose conduct is undermining the quality and reputation of Australian education. We are concerned that the all-encompassing nature of the draft Framework will waste resources and create unintended consequences, with far reaching negative impacts for universities and other high quality Australian providers of international education. It has also introduced a period of uncertainty into university planning and budgeting at precisely the time that significant parts of the sector are due to emerge from the devastating impact of the pandemic on international enrolments - particularly in Victoria.

Successive Federal governments have strongly supported Australian universities' work to attract international students by offering them high quality education. This has enabled universities to improve the range and quality of their education and research, for the benefit of students, the Australian economy, Australia's influence in international affairs, and societies here and across our region.

Universities are comprehensively regulated through a system of legislation and frameworks<sup>1</sup> that govern registration and accreditation for both providers and the courses they offer. In addition, the Migration Act and instruments under it form an important regulatory regime that applies to international students. We note that since new regulations were introduced to improve the integrity of the student visa system, Monash University has seen no change in its visa refusal rate.

On the other hand, within the current regulatory environment, there are loopholes that enable non-genuine, low quality or otherwise unscrupulous providers - mostly operating in the VET sector - to exploit vulnerable students, domestic and international.

We urge the Government to focus specifically on these providers of concern and introduce measures to ensure more effective regulation of their practices. Distinguishing (legislatively and otherwise) between privately owned VET providers - some of whom undoubtedly are not of high integrity and quality - and universities and government-owned providers, would more effectively accomplish the Government's objectives.

At the same time, we acknowledge that to achieve 'sustainable growth' over time of international student enrolments at universities, a certain degree of national planning is necessary. Any Government concerns regarding the overall international student profile or quality of a particular university would most effectively be resolved directly through dialogue with the relevant provider, within the existing regulatory framework for universities and negotiation of mission based compacts. This approach would avoid inadvertently diminishing the value of international education to the Australian economy and community or adversely affecting high quality providers that are meeting regulatory and societal expectations. While we are not aware of any concerns in relation to Monash University, we are ready to work in partnership with the Government to ensure there is a shared understanding of the purpose and characteristics of the University.

We are also concerned that some of the assumptions upon which the Framework is based might not hold. For example, setting enrolment limits, while imposing a maximum, is unlikely to directly influence the underlying capacity of a university to attract enrolments. The idea that a government can 'allocate' student enrolments to universities or courses or specific areas of Australia is problematic. Enrolments ultimately depend upon the individual choices of many thousands of prospective international students.

Whilst the intention of the draft Framework is to prioritise the 'best and brightest' international students, the overwhelming impression of public commentary on international students over the past 18 months from a variety of sources has been negative in tone. The signal sent by enrolment limits would compound this impression and could well have the effect of deterring students from applying to Australian universities, as can be seen from the recent experience of the UK and Canada.

The connection asserted in the draft Framework between international student numbers and pressures in the housing market appears not to exist. Comparison of the rental vacancy rate to the number of international student arrivals over roughly the past decade does not reveal any significant positive correlation.

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<sup>1</sup> These include the *Higher Education Support Act 2003*, the *Tertiary Education Quality and Standards Agency Act 2011*, the Higher Education Threshold Standards under that Act, and the *Education Services for Overseas Students Act 2000*.

We welcome the Government's intention to support further development of transnational education (TNE) and are concerned that other measures proposed in the draft Framework would work against the sector's capacity to invest in TNE and stifle innovation in high quality education offerings and relationships. The draft Framework seeks to advance internationalisation, for example via articulation agreements or the growth of overseas campuses. Yet at the same time, the increased interventions proposed would constrain the capacity of Australian universities to earn the revenue required to expand internationally. The draft Framework also forecasts visa restrictions that would make it more difficult for students in the Indo-Pacific region to travel to Australia.

We urge the Department and the Minister to continue to consult with key sector stakeholders prior to the introduction of policy changes in order to develop a framework that will achieve the stated policy objectives, supported by a well-considered implementation plan. There is no benefit to rushing to make change that is highly likely to have predictable and undesirable consequences.

## RESPONSE TO QUESTIONS

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

There are links between onshore international education and post-study visa applications, however the latter should not drive international education policy.

It is not the size of the market in itself that has caused the integrity issues. Attempting to manage international enrolment numbers down to the course level is not the solution to the challenges to quality and integrity. Focusing on the size of the higher education sector will treat some of the symptoms but not the cause.

- As the draft Framework notes, problems are caused by migration settings and conditions for specific visas, rules around visas that provide loopholes, and issues with CRICOS.
- Attracting the best students from diverse nations and maintaining system integrity requires a stable and reliable visa regime, with consistency in assessment and a timely turnaround time.
- There could be clear messaging in the course and visa application processes to indicate that onshore qualifications don't necessarily confer post study work rights or permanent residency pathways, and that it is the responsibility of the student to determine whether their intended course will lead to the outcome they are seeking.
- We commend the various reports and proposals of the [Grattan Institute](#) which take a long-standing and evidence-based position on the merits of preferring talent over skills in permanent migration settings<sup>2</sup>, and the impact this approach could have on reducing the returns to non-genuine providers and agents.

The costs and risks of a large and unwieldy framework applied to the entire sector outweigh the intended benefits. We advocate for investment in intelligent monitoring systems and working with existing integrity frameworks to target the areas where reform is needed.

We support the use of indicators to assess the risk of unscrupulous behaviour and to identify low quality programs. "Enhanced monitoring" should be considered carefully to avoid:

- Introducing additional reporting load for minimal benefit (noting that much of the information supplied by universities is not used or released in a timeframe which would provide greatest benefit)
- Competitive disadvantage within Australia and for Australia collectively in the global market
- Stifling innovation in development of new education offerings and models.

### 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?

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<sup>2</sup> Including, for example, <https://grattan.edu.au/news/migration-points-test-misses-the-mark/>

The Government does not have the power to “allocate” enrolments of international students. At most it can place limits on enrolments. International education is a global, competitive market and as has been observed in key competitor countries, attempts to intervene could have a compounding freefall effect:

- Students will make their own choices about where to study.
- ‘A managed system’ through the unprecedented ministerial powers proposed might make Australia unpredictable and therefore a riskier proposition for international students, who plan their studies many years in advance. This might cause the market to fall below what is required to sustain the university system within the current public funding environment.
- We note the situation unfolding in the UK, where there has been a 30% drop in applications from international students to study in the UK. The desirable students will either continue to apply to the more established, metropolitan institutions, or will move to countries that have more stable and welcoming policies.
- To provide transparency, responsibility and consistency in the application of new proposed ministerial powers:
  - the criteria and principles for decision making should be contained within the ESOS legislation
  - ministerial determinations should be reviewable/disallowable, or if this is not possible, ministerial reasons should be published or allowed to be requested by the relevant provider.
- Unique International Student Profiles should not be combined with diversification targets. China and India combined account for two thirds of the global higher education market. Ethical diversification strategies therefore are a long game, needing to encourage students to consider study in Australia, or to invest in offshore opportunities that require considerable cross-subsidisation, generally for at least the first 10 years at a minimum. (Further with respect to diversification, we do not understand the relationship between source country concentration and accommodation, transport, etc as implied on p19. Is the draft Framework proposing that students from markets other than India and China are more likely to study outside of Sydney, Melbourne and Brisbane?)

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

The economic, budgetary, social, and geopolitical significance to Australia of international students should be the paramount considerations. The structure of the different state and territory economies should also be considered. For example, international education is Victoria’s largest export. ‘A managed system’ should mean sustainable growth, not steady state or decline.

Given the relationship between international fee revenue and university operations, especially in the current environment where JRG funding for a course rarely covers the cost of its delivery, the Government should consider the potential impact of reduced revenue for universities on: the Commonwealth budget; universities’ workforce, course offerings, provision of amenities, research output, and strategic investment in TNE innovations and expansion (which is generally funded by onshore revenue); and potentially on the viability of some smaller institutions. Please refer below under Objective 3 for a discussion of TNE funding and operation.

Some level of national planning of enrolments, including of international students, is achievable. Further, universities need to maintain their social licence. We accept that at some point, too high a proportion of international enrolments at a public university, most likely at an undergraduate level, might be perceived to threaten the ‘public’ nature of the university.

Curbing international student enrolments will not solve Australia’s rental accommodation problem, given that international students account for 4% of renters. The data show that the rental vacancy rate lacks any significant positive correlation with the number of international students in Australia. Rather, it is the interplay of various supply and demand pressures that have created Australia’s overheated rental market. These drivers include the rise of smaller and solo-person households, intrastate migration, rising construction costs, planning delays, and a trend to re-purposing second bedrooms into home offices, amongst others.

## 3. How will this approach<sup>3</sup> to managing the system affect individual providers?

<sup>3</sup> <https://go8.edu.au/policy-brief-international-students-and-housing-and-other-cost-of-living-pressures> and <https://www.propertycouncil.com.au/submissions/myth-busting-international-students-role-in-the-rental-crisis>

The consequences of enrolment limits, combined with the prospect of the exercise of a discretionary ministerial veto at any time, could have a range of detrimental effects, depending on the nature and timing of such interventions and how they might change the number and distribution of international students enrolled in Australian universities.

These effects might include:

- Reduced capacity to plan ahead with confidence, resulting in workforce reductions. As Professor Andrew Norton has explained, the introduction of enrolment limits in order to “allocate” students to institutions (when we know that current incentives to influence enrolment patterns have failed), coupled with substantial adverse consequences for any institution that exceeds those limits, is likely to cause universities to enrol substantially fewer students than any limit permits.
  - “Capping international student numbers by university and course will lead to the stranded places problem – student places that are theoretically available but cannot in practice be used. Every condition added to the use of a student place reduces the chance that a student can be found who meets all the criteria.”<sup>4</sup>
- Scaled-down extra-curricular activities for students
- Reduced capacity to invest in supporting equity student success through scholarships, cost of living supports, and mentoring programs.
- Closure of courses that currently benefit from substantial internal subsidies, or more limited subject choices within retained courses, including languages
- Fewer innovations in teaching and learning
- Longer timeframes for upgrading old and essential teaching and research infrastructure
- Reduced research effort and outcomes, resulting in an overall decline in the status of Australia’s universities, which in turn would make Australia less attractive to international students, and potentially for foreign direct investment
- A reduction in or at least a slower approach to TNE development.

#### 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?

A risk-based approach should apply to all sectors of the education system, to target directly the integrity issues of concern.

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

The premise of linking the international higher education market and specific courses with domestic migration policy is deeply problematic. Collectively, public universities in Australia offer thousands of courses at undergraduate and postgraduate level. We do not think there is sufficient information available to be able to make decisions about which courses lead to graduates gaining employment in a skills shortage field and there are serious time lags involved between application, enrolment, completion and industry needs.

- We know that fewer than 20 per cent of international students settle in Australia, so their chosen courses of study are largely irrelevant to Australia’s skills needs.
- If regulation of enrolments in specific courses is aimed at international students who might be seeking to settle in Australia, a long term view should be taken. For example, long standing Grattan Institute research finds that “while there are significant short-term benefits for Australia from international students, the biggest economic benefits come from attracting students with the highest-earning potential,<sup>5</sup>” irrespective of their course and location of study. Further, “Forcing migrants to move to regional areas will likely reduce their incomes, reducing the taxes they pay and therefore also the size of the fiscal dividend they provide to the Australian community, while increasing the cost of the public services they consume<sup>6</sup>”.
- A course might not be in an identified area of skills need but might attract very bright students and equip them with the knowledge and skills to become significant innovators. Conversely some courses that are offered in known areas of skills shortage might not result in desirable graduate outcomes.

As long as the existing migration policy loopholes are closed, the current approach of the points system incentives and occupation skills lists enables migration-focused graduates to enrol in degrees that will give them a better chance of obtaining employment and

<sup>4</sup> <https://andrewnorton.net.au/2024/05/13/limits-on-international-student-numbers-could-reduce-enrolments-to-well-below-the-official-cap/>

<sup>5</sup> <https://grattan.edu.au/news/the-diversification-of-international-education/>

<sup>6</sup> Refer <https://grattan.edu.au/wp-content/uploads/2021/05/Rethinking-permanent-skilled-migration-Grattan-Report.pdf>



achieving permanent residency. The vast majority of international students who don't wish to settle in Australia should be able to select a course that suits their own career and life plans.

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

The current high level of net overseas migration is a short-term problem. As explained in a recent ANU policy briefing, net migration fluctuates with flows of migrant arrivals and departures. The current surge in total net overseas migration is the function not of greater arrivals, but of fewer departures, and this is a result of the extension to temporary visas during the pandemic<sup>7</sup>.

The long-term problem is one of planning, housing and infrastructure sufficient to support the current and future population, according to the government's planned growth, and population forecasts. In Canada, which instituted a cap on international students in response to public concern over immigration, subsequent analysis and data have not only confirmed that there was no link between the two, but that the caps could in fact further exacerbate the crisis due to a contraction of the labour market and by reducing the revenue of educational institutions which produce the highly-skilled engineers, urban planners and other key personnel that design and deliver innovative and cost-effective new housing solutions<sup>8</sup>. In light of these concerns, the Canadian Government has announced a significant investment in student housing both on and off campus, through the \$40 billion Apartment Construction Loan Program.

It should be noted that many Australian universities are already working with their State and Territory Governments to facilitate co-investment in further accommodation options, but are hampered by a range of planning, regulatory and cost factors that are impeding progress.

- Given national collective benefit from the international education market, the Government should partner with universities, accommodation providers, state and local governments to develop and co-fund new models for housing provision that also benefit, for example, university staff, students on placements, key-workers.
- The Commonwealth is also encouraged to include student accommodation in the definition of affordable housing and negotiate its inclusion in the National Housing and Homelessness Agreement. Through that Agreement the Commonwealth can provide incentives to those jurisdictions to make the necessary changes to planning regimes to fast-track and encourage development of such accommodation.

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

- Given the substantial number of offers to international students already made by a number of universities as part of the normal process, the introduction of new regulation of enrolments for 2025 presents significant and unresolvable difficulties for universities and students. Rushing the introduction of such regulation is highly likely to undermine the Government's objectives. It would be more realistic to defer the start of the new approach to 2026, to account for the long lead times associated with student/family budgeting and decision-making process, recruitment and admissions of international students.
- Any enrolment limits should have a tolerance or be materially higher than the actual target, to account for the imprecision of load planning/enrolment and unpredictable conversion rates.

### 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?

The development of a campus or substantial presence offshore requires years of planning and substantial investment. Financial losses in the early years of such a venture are common and understood as part of the investment matrix. Monash has long standing

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<sup>7</sup> <https://policybrief.anu.edu.au/explaining-the-2024-net-overseas-migration-surge/>

<sup>8</sup> <https://theconversation.com/international-students-cap-falsely-blames-them-for-canadas-housing-and-health-care-woes-221859>.



and extensive experience in offshore campuses and always approaches the investment on a decadal basis. In order to take such financial risks, an institution needs to be assured of its ability to manage them through relatively predictable revenue both on and offshore.

Unfortunately the proposed regime of enrolment limits contained within the draft Framework would directly undermine these conditions, in a number of ways:

- Interventions into institutional capacity to generate revenue that enables universities to expand their offshore offerings would greatly impede the efforts of Australian universities to maintain and grow their existing overseas campuses and would stifle any new initiatives.
- The diplomatic consequences of restricting onshore students while at the same time expecting full access to offshore markets. Regional reactions to Australian restrictions on international student access to onshore Australian studies, while simultaneously pursuing an expansionary offshore strategy, are unpredictable. It must be remembered that delivery of education in other countries by Australian institutions necessarily involves approvals, registrations, and indeed recognition of those qualifications from those same countries whose students would have limited access to Australian education within this country.
- Common TNE programs include study periods offshore and onshore.

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

Government can support TNE by:

- Allowing a sufficiently-market driven approach to onshore international student recruitment to cross-subsidise TNE expansion
- Engaging in genuine conversations with institutions that have been successful in developing TNE programs of all kinds to understand the end to end experience and time frames involved for sustainable success.
- Engaging in country-level cooperative agreements that facilitate qualification recognition for offshore and TNE programs.



APPENDIX

**MONASH GROUP PRESENCE**

