



14 November 2025

Committee Secretary
Senate Education and Employment Legislation Committee
PO Box 6100
Parliament House
Canberra ACT 2600

Dear Committee Secretary

I am writing to provide Monash University's input to the inquiry of the **Senate Education and Employment Legislation Committee into the *Education Legislation Amendment (Integrity and Other Measures) Bill 2025***.

We support the intention of this Bill to improve the integrity and reputation of Australia's education system, and to extend the demand driven system to places for First Nations students in medical courses. We know that a significant barrier to access is adequate preparation for tertiary study, so it's important that universities have the ability to support the extra students. In the five years to 2024, Monash University's Gukwonderuk Indigenous Health Unit and the William Cooper Institute have assisted 115 First Nations' health professionals to graduate, including 17 doctors, 18 nurses, four midwives, 37 in psychology and mental health, and 10 physiotherapists. We also graduated 12 First Nations PhDs, with half of these from the Faculty of Medicine, Nursing, and Health Sciences. And this year we awarded the 1,000th degree to an Indigenous student.

We have reservations about two aspects of the Bill:

Bill Part 2: Giving information to registered providers

Monash University supports the upholding of system integrity and therefore the collection of information about agent commissions through Government requests or regular automated reporting to achieve this objective. However, we remain concerned about the potential sharing of this data with other providers. Such disclosure could inadvertently drive up agent commissions, rather than achieving the stated objective of "protecting and enhancing Australia's reputation for quality education and training services for accepted students" (Part 2, Division 1, Section 20 of the Bill).

These concerns were also outlined, as per below, in our submission to the previous ESOS amendment consultation.

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.

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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 1'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.

We note that the amendment makes clear that information will be made available via a secure, controlled platform. We recommend a review of this aspect of the legislation two years after commencement to determine the impact on education agent commissions, student transfers and visa refusals.

Bill Part 7: Automatic suspension and cancellation of courses by the Minister

Monash notes that the Bill proposes three situations in which the Minister may suspend or cancel a course:

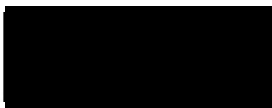
- (a) systemic issues related to delivery standard;
- (b) limited value to Australia's current, emerging and future skills and training needs and priorities; or
- (c) public interest.

The regulators for higher and vocational education, TEQSA and ASQA, monitor course and provider activity with respect to genuine education provision and delivery standards. Noting that the proposed Ministerial power would not apply to Table A providers, it is not clear why an additional Ministerial power is needed. Introduction of such an additional power would tend to undermine the role of these independent regulators. If the current grounds for the regulators to suspend or cancel a course are considered to be inadequate, it would be preferable to amend those provisions rather than introducing a new Ministerial power into the ESOS Act.

Monash provides input to the inquiry with a track record as a leader in international higher education, onshore and offshore. In 1961, Monash's first year, one in ten of the founding cohort came from overseas, mainly from ASEAN-member countries. Those students helped shape Monash in how we think about ourselves and how we operate. Today, in addition to five Victorian campuses, Monash has thriving campuses in Malaysia and Indonesia, joint graduate schools in China and India, a centre in Italy and a new research commercialisation hub in the Cambridge Innovation Centre in the United States.

I would welcome the opportunity to engage further on how the proposed amendments and related policies will impact Australia's international education sector, the national interest and future global engagement.

Yours sincerely



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