

Education Services for Overseas Students Amendment (Quality and Integrity) Bill 2024 [Provisions]

Questions on Notice

Q1. How many confirmations of enrolment you have issued for semesters 1 and 2 in 2025 and also whether you've issued any confirmations of enrolment for 2026?

Data sourced from PRISMS shows the number of approved Confirmations of Enrolment for commencing students is approximately 5,400 for 2025 and approximately 500 for 2026 (as at 29 August 2024).

Q2. Can you please provide a breakdown of international student numbers for each course at your universities, both undergraduate and postgraduate? And also a breakdown by country?

International student numbers at UNSW comprise 27.1% of undergraduate enrolments (headcount), and 52.2% of postgraduate enrolments (headcount), and come from more than 100 countries.

The below **Table 1** shows the number of international undergraduate and postgraduate students by program faculty for 2024 year to date.

Table 1

Academic Year		Academic Career	Distinct Headcount
2024		Undergraduate	2,228
2024		Postgraduate	4,136
2024		Undergraduate	3,182
2024		Postgraduate	6,450
2024		Undergraduate	188
2024		Postgraduate	1,637
2024		Undergraduate	667
2024		Postgraduate	315

2024		Undergraduate	1,437
2024		Postgraduate	747
2024		Undergraduate	3,240
2024		Postgraduate	8,506
2024		Undergraduate	63
2024		Postgraduate	25
2024		Undergraduate	2,013

Note:

- This table includes both onshore and offshore students.
- One student may appear in multiple faculties if studying cross-discipline courses concurrently.

The below **Table 2** shows the number of international students studying at UNSW by top ten countries for 2023.

Table 2

Academic Year	Citizenship	Distinct Headcount
2023	China	17,607
2023	India	1,439
2023	Indonesia	974
2023	Hong Kong	893
2023	Singapore	571
2023	Malaysia	564
2023	Viet Nam	313
2023	Taiwan	222
2023	Korea, Republic of	214
2023	Thailand	160

Q3. Are you able to, on notice, provide the committee with details about how that cross-subsidy works? We do need to understand the costs of each course—how it's delivered—and then how that cross-subsidy works as well. If you could provide the detailed data that we need to assess that, we'd be really grateful.

At UNSW, the overall cost of educating our domestic students in Commonwealth Supported Places (CSP) is around \$100m more than the Commonwealth funding received to educate those students, at

an average of \$3.5k per student (EFTSL) each year. This shortfall is cross-subsidised by international students.

The below table shows a summary by Field of Education (FOE) indicating the surplus/(deficit) for Commonwealth supported students in each field once the CSP and the cost of teaching are taken into consideration. This is the amount that we need to cross-subsidise each year for each such domestic student.

We note that these figures do not incorporate operational costs relating to, for example, staff wages; teaching spaces; research facilities; and other broader capital infrastructure. It also does not account for ancillary services operating across the university that deliver, for example, staff and student support services, including wraparound supports for equity students; entrepreneurship support and programs; work-integrated learning components; and work, health and safety management. Therefore, the true level of cross-subsidisation would be even higher.

As these costs of teaching are confidential to UNSW, we would appreciate the Committee's confidentiality and discretion, and request that this information is deidentified.

UNSW has taken the decision to educate domestic students over and above the capped number of Commonwealth Supported Places, in line with population growth and need to educate growing numbers of Australians. Essentially the cap has not grown for a number of years, but the number of young Australians seeking a tertiary education has. It is our responsibility to teach them even if we are not funded to do so by the Commonwealth Government. This "load gap", also requiring cross-subsidy by international students, is projected to be around \$28m in 2024, growing to more than \$50m by 2026. This equates to approximately 2200 (full time equivalent) domestic students.

Q4. I'm very keen to understand the data errors made by the Department of Education. Are you able to briefly describe those data errors in relation to your own universities? Can you also identify where there is not enough data and where there is a breakdown in departments talking to each other in relation to data.

There have been a number of data errors made by the Department of Education. These are set out below. The fact that the formula for setting caps is based on 2023 figures, rather than 2024 data, indicates that critical decisions are being made on the basis of out of date information, and in turn leading to sub-optimal outcomes. Furthermore, UNSW College commenced delivery as an independent CRICOS registered higher education provider in 2024, and this has not been given due consideration by the Department.

A summary of data errors is set out below:

The Department has generally used the Term Address student data field to identify how many international students are studying onshore in Australia or offshore. Despite visa requirements for students to maintain up-to-date address details with their provider, and regular requests from providers for students to update their contact information, many international students use an address in their home country (i.e. their family's home address) as their Term Address.

As a result, Term Address is an unreliable indicator of the onshore or offshore status of an international student and has led to misinterpretations by others using the onshore/offshore data provided by the Department. For example, TEQSA uses onshore/offshore data in its annual provider risk assessment process, leading to inaccurate representations of a providers student profile, student progression and attrition, student-staff ratios, etc.

Following consultations with providers in the lead up to publishing 2023 student data, the Department appears to be changing its approach and using the citizen-resident information (data element e358) reported by providers to the Department via TCSI – as referenced in the notes on international student concentration data included in the 27 August letter from the Department advising of UNSW's indicative cap. This is a much more accurate indicator of the total number of international students enrolled with a provider, but may not be entirely accurate for identifying onshore/offshore status. PRISMS / Department of Home Affairs data is most suitable for this purpose, however the lack of integration with DoE systems means that the two different data sources appear to be used separately to quantify international student numbers.

The most accurate source of location data (i.e. whether an international student visa holder is onshore or offshore) is held by the Department of Home Affairs, linked to the student's visa and passport details. Providers currently access location and other CoE and visa-related information via manual downloads of reports through the PRISMS which is inefficient and labour intensive. The data included in PRISMS reports is very detailed and little context or advice is provided as to how to interpret the various fields or which fields are most appropriate for accurately identifying specific cohorts of students.

Unfortunately, requests to PRISMS for assistance and clarification go unanswered for long periods of time, impacting providers' ability to accurately monitor and forecast cohorts of students requiring student visas.

Due to the lack of comparability between PRISMS (DHA) and TCSI (DoE) data a single source of truth will need to be agreed between the Departments as the reference point for all monitoring and reporting against the new caps, along with agreement that TCSI data is not currently suitable for this purpose.

The 27 August letter from the Department provided an indicative International Student Profile (ISP) for each provider based on PRISMS CoE data, alongside International Concentration information based on onshore data sourced from TCSI using data element 358. These two data sources provide different information regarding numbers of international students, based on the different definitions.

The summary of data errors is indicative of how challenging it is to be able to set caps on international students, based on accurate data. With the penalty provisions as currently drafted in the Bill including automatic suspension for even the most minor breaches, the implications of further data errors could be catastrophic.