

UNSW College Submission – Senate Education and Employment Legislation Committee: Education Legislation Amendment (Integrity and Other Measures) Bill 2025

UNSW College welcomes the opportunity to contribute to the Senate Education and Employment Legislation Committee's inquiry into the *Education Legislation Amendment (Integrity and Other Measures) Bill 2025*. Like our parent entity UNSW, UNSW College supports the Bill's overarching objective to strengthen integrity, transparency, and accountability across Australia's higher education system, while promoting equitable access and sustaining the global reputation of Australian education.

Strengthening Integrity in International Education

UNSW College endorses the Bill's measures to enhance transparency in education-agent arrangements and strengthen oversight of international education delivery.

In its response to [Recommendation 13 of the Nixon Review](#), the Government agreed to consider action to ban commissions paid by providers to education agents for onshore student transfers. It also agreed to consider further measures to deter collusive behaviour between providers and education agents to exploit Australia's education and migration systems.

We note that the Bill inserts a definition of "education agent commission". It is anticipated that this will allow for complementary amendments to be made to the National Code of Practice for Providers of Education and Training to Overseas Students 2018 to ban commissions being paid to education agents for onshore student transfers.

The Explanatory Memorandum to the Bill¹ provides: *"Some collusive business practices between providers and agents are driven by agents seeking commissions through facilitating onshore transfers of students between providers, especially from the higher education sector to the VET sector."*

UNSW College supports the ban on onshore student transfers in cases where international students are seeking to downgrade the AQF level of their studies or move laterally.

- Downgrades (e.g. Higher Education → VET)
- Lateral transfers (e.g., Undergraduate → Undergraduate)

This responds directly to the behaviours the Minister aims to curb.

UNSW College recommends **exempting education agent commissions for upgrades in AQF level, e.g.**

- VET/Foundation → Undergraduate;

¹ Education Legislation Amendment(Integrity and other Measures) Bill 2025 [Explanatory Memorandum](#), Pg. 22

- Undergraduate → Postgraduate

These transfers represent legitimate academic progression and alignment with student aspirations. In such cases, education agents play a constructive role in guiding students toward higher-level qualifications. Allowing commissions in these circumstances supports student mobility and informed decision-making, without undermining the integrity objectives of the Bill and moves to ban onshore transfer commission.

For example, a Foundation Studies student on a packaged visa to study an undergraduate program at **University A** passes their Foundation Studies program but does not meet the entry requirements for their chosen undergraduate program at University A upon completion of Foundation Studies.

That student may wish an agent to assist them to find entry to another University, **University B**, where they do meet the entry requirements for a similar undergraduate program.

An agent recruiting to University B should be permitted to earn a commission for their work to assist and guide the student to find a path to academic progression. It reflects a legitimate academic outcome where the agent plays a constructive role.

Should you wish to discuss any aspect of this submission, please contact:
government.relations@unsw.edu.au