



BOND UNIVERSITY

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

Dear Sir/Madam,

**Submission to the Senate Standing Committee on Education and Employment
Inquiry - *Education Legislation Amendment (Integrity and Other Measures) Bill 2025***

Bond University Overview

Bond University is Australia's first private, not-for-profit university, established in 1989 with a founding commitment to innovation, excellence, and student-centred education. As a self-accrediting institution, Bond University delivers a broad suite of undergraduate and postgraduate programs, underpinned by rigorous academic standards, quality assurance frameworks and world-class research. Bond University consistently ranks among the top institutions nationally for student satisfaction, graduate outcomes, and teaching quality.

Key Concerns

Bond University welcomes the opportunity to provide input into the Senate Standing Committee's Inquiry into the *Education Legislation Amendment (Integrity and Other Measures) Bill 2025*. We support the Government's commitment to strengthening the integrity and sustainability of Australia's international education sector, however, we wish to raise several concerns regarding the current drafting of the Bill, particularly in relation to:

1. Ministerial discretion and regulatory overreach;
2. Changes to Requirements around Education Agents and Commissions; and
3. Changes to offshore higher education delivery.

1. Ministerial Discretion and Regulatory Overreach

The Bill proposes that the Minister be granted broad discretionary powers to suspend, cancel, or reject course registrations. While we understand the intent to enable swift intervention in cases of serious non-compliance, the current drafting lacks clear thresholds, procedural safeguards, and avenues for review. These powers are extraordinary in scope and sit uneasily alongside the existing robust regulatory framework administered by the Tertiary Education Quality and Standards Agency (TEQSA).

Of particular concern is the exemption of Table A universities from these provisions, while applying them in full to all other providers, including Bond University and other self-accrediting, not-for-profit institutions listed under Table B of the *Higher Education Support Act 2003*. This creates a two-tier regulatory regime that is inconsistent with principles of competitive neutrality and risk-based regulation.

Bond University has self-accreditation status equivalent to Table A universities. We are subject to the same regulatory standards and quality assurance mechanisms as Table A universities and, in our recent TEQSA re-registration, Bond was granted the maximum seven-year term with no conditions.

Bond University is a not-for-profit institution with over 35 years of demonstrated excellence in education, governance, and compliance. Our operations are underpinned by rigorous governance, with oversight from an independent University Council and compliance with Corporations Law as a company limited by guarantee. As a registered charity, all surpluses are reinvested into scholarships, infrastructure, and research.

The distinction being made between Table A and other high-quality providers is not grounded in an assessment of provider quality or risk. Further, it is inconsistent with the Government's broader policy agenda. The Australian Universities Accord has rightly emphasised the need for a more diverse, innovative, and inclusive higher education system; one that supports student choice, fosters competition, and encourages excellence across all provider types.

By embedding a structural disadvantage in legislation, the Bill risks undermining these objectives. It may also have unintended consequences for Australia's international education brand, particularly if high-performing private universities are perceived as less secure or credible due to the presence of unchecked Ministerial intervention.

There is also a very practical ramification concerning commercial operations. For instance, it may undermine our ability to access financial lines of credit; it could impact on perception of the University's reputation; and signal a perceived decline in quality, potentially affecting student recruitment and partnerships.

Recommendation 1

That the exemption currently afforded to Table A universities under Schedule 1, Part 7 of the Bill (Sections 96C, 96D, and 96E of the proposed Division 1AB of the *Education Services for Overseas Students Act 2000*) be extended to include:

- All not-for-profit Table B universities; or
- All TEQSA-registered universities; or
- All self-accrediting institutions.

2. Changes to Requirements around Education Agents and Commissions

Bond University supports greater transparency in agent-provider interactions and acknowledges that most agents and providers act in accordance with Standard 4 of the National Code of Practice for Providers of Education and Training to Overseas Students 2018. However, the revised definitions of "education agent" and "education agent commissions" are overly broad and risk capturing entities not typically understood to fall within scope.

The inclusion of individuals engaged under fixed-term contracts, while excluding permanent employees, presents a challenge for institutions that employ staff offshore to support recruitment and engagement. Due to local employment regulations, such staff are often employed on fixed-term contracts but are subject to the same oversight and obligations as other employees.

Recommendation 2

That the definition of “education agent” explicitly exclude fixed-term employees who are directly employed and managed by a single registered provider and subject to the provider’s usual employment obligations.

3. Changes to Offshore Higher Education Delivery

Bond University supports increased TEQSA oversight of offshore delivery but emphasises the need for a clear and consistent definition of arrangements that fall within scope. Terms such as “offshore delivery,” “transnational education,” and “dual awards” are currently interpreted variably across the sector.

The Threshold Standards define offshore delivery as any arrangement where an Australian provider delivers a course or part thereof to students outside Australia, directly or via a partner, however, the Bill’s accompanying fact sheet suggests that joint or dual awards are also in scope. These collaborative academic arrangements, typically governed by mutual recognition and credit transfer policies, do not present the same regulatory risks as standalone offshore delivery.

International frameworks, such as the UK Quality Assurance Agency for Higher Education Characteristics Statement, offer useful distinctions between transnational education and qualifications involving multiple degree-awarding bodies.

Recommendation 3

That a clear and consistent definition be developed to delineate the scope of the legislation as it relates to offshore higher education delivery, and that joint and dual awards be appropriately recognised as distinct from offshore delivery of an Australian course of study.

Closing Statement

Bond University remains a committed partner in advancing Australia’s international education interests. We support the Government’s efforts to enhance sector integrity and sustainability, however, we urge that the Bill be amended to reflect a more equitable, evidence-based, and proportionate approach to regulation.

We thank the Committee for considering this submission.

Yours sincerely,



Professor Tim Brailsford
Vice Chancellor and President