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Education and Employment Legislation Committee
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Group of Eight (Go8) submission to the Inquiry into the Education Legislation Amendment (Integrity and Other Measures) Bill 2025

The Go8 consents to the publication of this submission and has no wish for any of it to be treated as confidential.

Introduction

The Group of Eight (Go8), comprising Australia's leading research-intensive universities, reaffirms its commitment to a higher education and research sector built on quality and integrity. As outlined in our submission to the *Education Services for Overseas Students Amendment (Quality and Integrity) Bill 2024 [Provisions]* inquiry, we support the Minister's intention to remove "shonks and crooks" and "dodgy providers" from the system. Accordingly, we endorsed Parts 1-6 of that Bill, and continue to support these provisions as they appear in Parts 1-6 of the *Education Legislation Amendment (Integrity and Other Measures) Bill 2025*.

We also strongly support the decision to exempt Table A providers from the automatic course cancellation provisions. This sensible approach corrects the overreach in the previous bill and ensures attention is focused where it is most needed.

This submission will therefore focus on the proposed amendments to the *TEQSA Education Quality and Standards Agency Act 2011* (TEQSA Act) and their implications for offshore and transnational delivery.

Recommendations

- 1. The Go8 supports Parts 1-6 of the Bill, to improve the integrity and transparency of Australia's international education sector.**
- 2. The Go8 supports the exemption for Table A providers from the automatic course cancellation provisions.**
- 3. Exempt self-accrediting universities from Clause 44G notification requirements for commencing or ceasing offshore courses, as these obligations create unnecessary administrative burden without delivering meaningful regulatory benefit.**
- 4. Keep annual reporting requirements under Clause 44H to an absolute minimum for self-accrediting universities, ensuring they are clearly linked to risk mitigation and do not duplicate information already available through existing systems such as HEIMS and TCSI.**



The Go8 supports measures that uphold the quality and integrity of Australia’s higher education sector, and this commitment should extend to offshore delivery. Our international reputation is critical to attracting high-quality students to Australian programs, whether delivered here in Australia or overseas.

However, these measures must be proportionate, balanced and avoids unnecessary burden – minimising compliance costs for providers and avoiding unnecessary strain on TEQSA. This will enable universities to continue delivering high-quality education services offshore without excessive delay or interruption. The Go8 acknowledges and supports the stated intention for the amendments to be *“light-touch... take into account existing offshore arrangements, and take into account information that providers already hold”*, as outlined in the Explanatory Memorandum to the Bill.¹

The following amendments would further improve the process, reduce unnecessary burden and uphold the principle of light-touch regulation.

- **Reduce notification requirements for established providers:** Clause 44G of the Bill requires providers to notify TEQSA in writing when they begin (1c) or cease (1d) delivering a course offshore. This obligation could reasonably be waived for self-accrediting universities. For example, there is no material difference between courses offered by Monash University onshore in Australia and those at Monash Malaysia. Requiring notifications for every change in course offerings would impose a significant—and unnecessary—administrative burden without delivering meaningful regulatory benefit.
- **Annual Reporting:** Clause 44H requires providers to report annually to TEQSA on each offshore course of study, with the specific details yet to be defined. Without further clarity it is difficult to determine whether this aligns with the intended light-touch approach. For self-accrediting universities, reporting obligations should be kept to an absolute minimum and clearly linked to risk mitigation, ensuring compliance does not create unnecessary administrative burden. Importantly, reports should not request information that TEQSA can access through existing systems, such as the Higher Education Information Management System (HEIMS) and the Tertiary Collection of Student Information (TCSI).

I would be pleased to discuss the contents of this submission in further detail. I can be contacted directly (e: [REDACTED]) or via my Executive Assistant, [REDACTED].

Yours sincerely

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VICKI THOMSON
CHIEF EXECUTIVE

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https://parlinfo.aph.gov.au/parlInfo/search/display/display.w3p;query=Id%3A%22legislation%2Fems%2Fr7384_ems_ab5e8799-e392-4ed9-a882-b333fd5e9735%22