Submission to:

The Hon Julian Hill, MP

Assistant Minister for International Education
Assistant Minister for Customs, Citizenship & Multicultural Affairs
Australia

05 December 2025
Hyderabad, India

Association of Australian Education Representatives in India
www.aaeri.org.in

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To
The Hon Julian Hill, MP
Assistant Minister for International Education,
Assistant Minister for Customs, Citizenship and Multicultural Affairs, Australia

Dear Sir

Subject: Submission from AAERI

On behalf of the Association of Australian Education Representatives in India (AAERI), I would like to express our sincere gratitude for today's meeting and the constructive discussions on the future of international education.

In this letter, we would like to present some concerns and highlight a few important issues for your consideration.

ESOS Bill and Amendments

AAERI welcomes the passage of the ESOS Bill in Australian parliament. The clarification of the definition of an **"education agent"** is a positive step for the sector, as it will enhance transparency, clarify responsibilities, and support ethical agents.

We acknowledge the growing industry discussion regarding the potential prohibition on commission payments for onshore course transfers. However, we are concerned that some providers may attempt to replicate commissions through alternative arrangements, such as marketing incentives or unaccounted transfers. The fact sheet's clear definition of **"commission"** is beneficial and we hope it will mitigate such acts.

We await the National Code to provide more detailed guidance under the ESOS changes.

Concerns on Onshore Recruitment Practices

We would like to express our concerns regarding onshore recruitment practices. Its bserved that numerous private institutions are now offering degree and vocational training programs and are actively seeking to fill their vacancies. Many of these institutions are also very active onshore.

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We have noticed that to attract students, some providers through their onshore agents employ techniques such as "No funds required," "No GSI check," and even "fee after visa."

Onshore poaching of students is a serious issue that adversely affects all universities, ethical agents, and genuine students. Many innocent students are misled or guided incorrectly and subsequently change their courses without any tangible benefit. They are being presented with ideas such as:

- "No attendance required."
- "Accept a university offer solely to obtain a visa."
- "Work full-time."
- "Cheaper fees" and "Discounts."
- "Migration outcomes."

These misrepresentations mislead students and damage the reputation of the entire sector. While critics rightly assert that students have the right to change their courses or providers—and indeed, some students do have legitimate reasons—the misuse of this right is on the rise.

Recommendations:

We acknowledge that students have the right to change courses or providers for legitimate reasons. However, we also believe that protecting students from exploitative recruitment practices should be a priority. Therefore, we recommend that the Department of Education and the Department of Home Affairs consider implementing stronger measures to combat onshore poaching, including:

- *Exploring mechanisms to link student visas to their original provider and requiring a fresh visa application onshore that re-establishes genuine student criteria when students seek to transfer onshore.*

- *Implementing stricter and more consistent genuine student (GS) checks across the sector, with clear penalties for providers who circumvent these checks, particularly for onshore transfer students.*

- *Increasing transparency regarding marketing incentives and third-party arrangements to ensure that they are not used as covert commission substitutes.*

- *·Strengthening Collaboration with Recognised Agent Associations (e.g., AAERI) to Promote Verified Agents and Share Intelligence on Problematic Providers, Onshore Agents, and Recruitment Networks*

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Aggregators and the Growing Threat

Other significant concerns within the industry are the rapid proliferation of **"aggregators"** in India and South Asian markets. These companies often self-identify as edtech platforms, but in reality, they operate akin to extensive agent networks comprising thousands of sub-agents. The majority of these sub-agents are untrained, lack accountability, and operate without any direct oversight from institutions or established protocols.

This has resulted in a rapidly expanding sub-agent culture, wherein students are increasingly **disconnected** from genuine institutions and often **misinformed**. Regrettably, many students remain unaware of their actual agent or the genuine institution they are applying to. Furthermore, we have observed that prominent aggregators openly assert their collaboration with 1,000 to 3,000 sub-agents, relying on concealed sub-networks or third-party referrals in numerous instances.

Numerous education providers currently rely on these aggregator services, which further amplifies the disparity between institutions and the students they seek to support.

Under the recently implemented ESOS amendments, all universities are mandated to prominently display every agent and sub-agent on their websites. This presents a substantial compliance challenge. It is impractical, if not outright impossible, for universities to identify, verify, and publicly list thousands of sub-agents they have not directly engaged with and whose quality they cannot independently assess. **This situation could potentially lead to confusion among students, undermine transparency, and potentially damage the institutional and national reputations of both institutions and countries.**

Some education providers have tried to pass on their responsibility by placing the responsibility solely on the principal agent. This might not be enough when the principal agent is an aggregator whose business model is of aggregation of subagents and these subagents can be anyone and numbering in thousands. By known experience, these subagents have even led the aggregators into police cases in India even filed by the US Embassy and even in some instances in human smuggling charges. The aggregators have often got implicated in this unknowingly simply because of their business model.

The experience in Canada, where numerous institutions openly relied on aggregators, serves as a **stark warning**. It not only tarnished Canada's reputation as a study destination but also attracted dubious students and resulted in widespread misuse of student visas. **Australia has been cautioned about this risk for several years, and it is now the opportune moment to implement more robust preventive measures.**

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Recommendations:

- **Direct Contracting:**
Encourage a model where universities directly contract with agents, thereby eliminating anonymous or unverified networks of sub-agents. The best form of recruitment is via trusted, trained agencies and not via faceless sub agents

- **Quality and Training Requirements:**
Ensure that individuals counselling students, whether agents or sub-agents, are appropriately trained, certified, and adhere to minimum quality standards. The recruitment system must be based on integrity & trust & a system without personal student contact will lack accountabbility. ESOS Standard 4 can provide clear explaination & standards of education agent responsibilities

VET and TAFE Sector - Need for Clear Positioning and Student Guidance:

Australia's public TAFE system is globally recognised for its exceptional quality, practical training, and robust industry connections. The Australian Association for Educational Research and Information strongly advocates for the increased promotion of the VET and TAFE sectors to Indian students.

It is imperative that **TAFE Australia is clearly distinguished from the private VET sector.** Students should be encouraged to pursue studies at world-class Australian TAFE institutions to acquire technical, vocational, trade, or professional qualifications. These qualifications provide valuable skilled pathways that can lead to higher education opportunities or fulfilling employment.

AAERI members are prepared to support this initiative by providing accurate counselling to students and promoting genuine, high-quality VET and TAFE options.

Transnational Education (TNE) in India

We welcome the growing interest of Australian universities in establishing and expanding Transnational Education (TNE) initiatives in India. TNE has strong potential, but its **success will depend on ensuring that programs directly compete with India's leading universities** and are recognised for delivering high-quality domestic education.

It is important to highlight that parents and students do not perceive TNE as a substitute for the comprehensive Australian on-campus international education experience. TNE is a distinct category—valuable in its own right, but catering to different needs and expectations.

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We believe there is significant merit in models where **students commence their studies in India and complete their final year or final semester in Australia.** This approach retains the value of the Australian experience while providing a more affordable pathway.

> *Recommendations:*
>
> *AAERI can play an important role in supporting TNE by:*
>
> - *Providing accurate counselling to students and parents on TNE pathways;*
> - *Sharing insights from student and agent networks to strengthen TNE program design and market positioning.*
> - *Sharing insights from student and agent networks to strengthen TNE program design and market positioning.*

Rising Tuition Fees: A Challenge for Australian Education

The Australian dollar's appreciation against the exchange rate and the substantial increase in tuition fees have prompted many students and families to question the return on investment (ROI) of studying in Australia.

Furthermore, students who were previously considering the United States are now exploring Australia as an alternative study destination. While the United States is likely to regain its position in the future, this presents a valuable opportunity for Australia to capture the attention of high-quality, academically driven students and strengthen its position as a preferred study destination.

> *Recommendation: Attracting the Best Students from India*
>
> *To enhance Australia's ability to attract the most talented students from India, Australian institutions could implement a comprehensive scholarship and bursary program. This would make education more accessible and appealing to a broader range of students.*

Student Visa Application Fee: A Balancing Act

The significantly high student visa application fee raises concerns about its impact on the integrity of the education system. While it is believed that higher fees can help ensure the application of genuine students, they may also have unintended consequences.

Many non-genuine or "dodgy" applicants who perceive Australia primarily as a migration or work pathway may be willing to pay a high fee. Conversely, genuine students from middle-class families may reconsider Australia and seek alternative destinations with lower upfront costs. This risk diverting high-quality, academically driven students away from Australia.

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> **Recommendation:** *A Balanced Approach to Visa Fees*
>
> *We urge the Government to review the current visa fee structure and consider a balanced approach that maintains integrity settings without discouraging genuine, deserving students.*

Capping Limits: Striking a Balance

In conclusion, Australia must strike a balance between maintaining the integrity of its education system and ensuring that high-quality, academically driven students are attracted to the country.

If there were a methodology whereby agents could access the capping limits of each institution, it would assist in preventing situations where a student submits an application to an institution that has already reached its capacity without their knowledge. This transparency would ensure more effective planning, reduce disappointment for students, and enable agents to guide applicants more efficiently.

Student Visas

Occasionally, we observe sudden episodes of heightened visa refusals. While we acknowledge that the Department of Home Affairs has its own criteria for assessing the authenticity and genuineness of applications and that numerous factors are considered, it is evident that even strong, positive-profile students are occasionally denied admission.

The rejection letters often lack clarity regarding the specific reasons for the rejection and tend to be overly generic. This lack of specificity engenders confusion among students, agents, and institutions, making it challenging for applicants to address concerns in subsequent applications.

> **Recommendation:**
>
> *May we request that the Department of Home Affairs provide more detailed and specific refusal reasons to assist students and institutions in comprehending the issues raised in applications?*
>
> *Enhanced transparency will enable applicants to rectify genuine deficiencies, reduce repeat submissions, and support a more equitable and consistent visa assessment process.*

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Impact of Anti-Immigration Protests and Media Narratives

We also wish to draw attention to a growing concern among students and parents in India regarding the recent anti-immigration protests in Australia and the manner in which these events are reported in the media. Such coverage can instil fear and uncertainty, prompting families to question whether Australia continues to be a welcoming and secure destination for international students.

Even if these protests involve only a small segment of the population, the negative perception spreads rapidly and can influence student decision-making.

> *Recommendation:*
>
> *Clear, proactive communication from the Australian Government regarding its commitment to international education, student safety, and multicultural values would effectively address these concerns. Regular engagement with the Indian Press and sharing success stories would be beneficial.*

AAERI Verify (Document Verification Tool)

AAERI has been actively working on several initiatives to enhance transparency and accountability in international student recruitment. One notable initiative is AAERI Verify, which leverages the Indian Government's DigiLocker, the Academic Bank of Credit, and other official portals to screen and verify student credentials.

The system will be operational by January 2026, enabling AAERI members and Australian institutions to swiftly confirm the authenticity of identity documents, educational certificates, bank statements, tax returns, and education loans. **This measure significantly reduces the risk of fraud. By adopting AAERI Verify, institutions can make informed decisions, adhere to ESOS requirements, and foster trust with students and their families.**

> *Recommendation - Strengthing trust via verified documents*
>
> *AAERI strongly urges all Australian universities to adopt this methodology and mandate its use at the time of admission by their agents*
>
> *AAERI intends to demonstrate this system to universities in the near future. We also request the Department of Education's assistance in conveying this message to all senior officials at Australian universities and institutes to ensure widespread adoption and consistent implementation.*

Role of AAERI in Self-Regulation and Open Dialogue with the Australian Government

AAERI stands prepared to assume a more prominent role in supporting the Australian Government's integrity and quality objectives within the international education sector. As the sole long-established association representing Australian education agents in India, we are well-positioned to contribute significantly to self-regulation and enhanced industry standards.

A key condition for membership in AAERI is the signing of a declaration to adhere to Australia's ESOS Act, the National Code, and the principles of ethical practice. This facilitates the extension of Australian standards beyond Australia's borders by ensuring that education agents in India operate under the same ethical framework.

We welcome the opportunity for regular dialogue with the Assistant Minister's office and the Departments of Education and Home Affairs. AAERI is open to collaborative initiatives such as:

- Developing training programs on quality, compliance, and ethical recruitment.
- Collaborative messaging to counter misinformation across various regions of India.
- Supporting institutions in promoting verified agents and transparent student pathways.
- Sharing market intelligence and providing adverse information on agents or stakeholders to the Australian Government when necessary.

AAERI remains committed to working constructively with the Australian Government to safeguard students, uphold integrity, and ensure that Australia remains a trusted and competitive study destination.

Thank you once again for your time and consideration.

Sincerely,

Nishidhar Borra
President - AAERI

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