

14 August 2026

The Regional Universities Network (RUN) welcomes the opportunity to contribute to the Tertiary Education Quality and Standards Agency (TEQSA) consultations related to Transnational Education reporting and the Education Services for Overseas Students Act 2000 (ESOS) registration renewal application period.

RUN is a national collaborative group of six regional Australian universities:

- Charles Sturt University
- CQUniversity Australia
- Federation University Australia
- Southern Cross University
- University of New England, and
- University of Southern Queensland.

This submission reflects the positions of RUN institutions. In doing so, this submission also aims to represent the views of the communities which RUN universities serve; the one-third of Australians who live outside of metropolitan centres in regional, rural and remote locations.

Consultation #1: Transnational Education reporting

TEQSA's approach

RUN firmly believes that TEQSA should continue to adhere to the three basic principles of regulation as outlined in the TEQSA Act:

- the principle of regulatory necessity,
- the principle of reflecting risk, and
- the principle of proportionate regulation.

The approach outlined in the consultation paper is a one-size-fits-all approach that does not consider the above principles and treats all universities homogeneously.

RUN supports a regulatory regime of periodic reporting against the offshore delivery activities undertaken by Australia's universities; however, this should be done so on the basis of risk. While RUN acknowledges the reputational and integrity objectives that such reporting seeks to support in ensuring providers continue to meet and uphold their legislative requirements relating to offshore delivery, the reporting requirement will represent a substantial compliance cost for providers.

Proposed manner of reporting

While the 13 distinct areas being proposed are logical in relation to the legislation, there remain considerable issues relating to how the data is collected and reported to TEQSA. RUN supports TEQSA's stated aim of minimising duplication in reporting in this process and welcomes TEQSA's undertaking to work with agencies to support data consistency and reduce duplication where feasible, moving forward. It is unclear, however, why this work has not been done in the first instance to ensure that data collection is best practice and results in minimal regulatory burden to providers, instead of providers having to divert resources towards labour-intensive reporting processes.

RUN questions TEQSA's need to recapture the information sought by the proposed reporting requirements by 31 October 2026 via the scheduled reporting of Transnational Education activities, when providers have already provided much (if not all) of this information to TEQSA earlier in 2026. RUN believes this represents unnecessary, duplicative regulatory activity that is contrary to TEQSA's regulatory principles of necessity, risk, and proportionality. RUN would prefer TEQSA to uphold the 'report once, utilise often' approach to engagement with the sector, and for TEQSA to recognise the disproportionate impact that duplicative regulatory burden has upon the services provided to students by universities, particularly those hosting the largest concentrations of underrepresented student cohorts.

I RUN RECOMMENDS

TEQSA seek confirmation from individual providers that the information held by TEQSA from previous TNE data collection activities remains current and accurate (allowing for updates as necessary), rather than duplicating previous TNE information gathering processes.

Consultation #2: ESOS registration renewal application period

RUN does not have any issues or comments to provide regarding TEQSA remaking the ESOS (TEQSA Registration Renewal Application Period) Determination 2016 without substantive amendment.

Further enquiries can be addressed to:

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