

National Policy Perceptions, Institutional Strategies and Challenges in International Student Recruitment: Insights from Malaysia's Private Higher Education Sector

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ABSTRACT

The internationalisation of higher education has become a strategic priority for governments seeking to strengthen global competitiveness, attract talent and expand education exports. In Malaysia, successive national policies have positioned private higher education institutions (HEIs) as key contributors to international student recruitment. However, little is known about how private HEIs perceive and respond to these policies despite their central role in achieving national internationalisation goals. This study examined private HEIs' perceptions of national policy support, the institutional strategies adopted in response and the implementation challenges encountered. Guided by institutional theory, a mixed-method survey of 113 Malaysian private HEIs combined quantitative and qualitative analyses to examine policy implementation. The findings revealed a persistent implementation gap. Although national policies were generally perceived as supportive in intent, their effectiveness was constrained by fragmented inter-agency coordination, limited resource support and policy complexity. Larger private HEIs were better able to implement substantive, largely self-funded strategies, whereas smaller institutions relied on low-cost measures and informal workarounds, reflecting unequal institutional capacity and symbolic compliance. The study demonstrates how institutional theory explains the interaction between market dependence and

institutional capacity in shaping organisational responses to national internationalisation policies. It highlights the need for differentiated capacity-sensitive policy support to strengthen implementation and advance Malaysia's internationalisation agenda more equitably.

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INTRODUCTION

Higher education internationalisation encompasses a wide range of activities, including student and staff mobility, internationalised curricula, research collaboration, transnational education and institutional partnerships (de Wit & Altbach, 2021; Tight, 2022). Among these, international student mobility has become one of the most visible and strategically important dimensions, making international student recruitment a key priority for governments worldwide. This shift is fuelled by objectives such as strengthening global competitiveness, expanding soft power influence, attracting talent and generating national revenue (Oladipo & Sugandi, 2022; Tight, 2022). As international student mobility is more integrated with education export agendas (James & Derrick, 2021), more countries are embedding international student recruitment within their national policy frameworks. In Malaysia, over 70 per cent of the country's 335,000 international students will enrol in private HEIs in 2030, resulting in an expected revenue generation of RM33.5 billion (Ministry of Education [MOE], 2020). However, the extent to which national policies effectively support or constrain private HEIs' internationalisation efforts remains unclear, despite their critical contributions to the ambition of Malaysia's policy goals.

Malaysia articulates its ambitions to become a leading regional and global education hub through four strategic plans, namely: (i) the National Higher Education

Strategic Plan (2007-2020) (NHESP), (ii) the Internationalisation Policy for Higher Education Malaysia (2011) (IPHEM), (iii) the Malaysia Education Blueprint 2015-2025 (Higher Education) (MEBHE) and (iv) the Way Forward for Private HEIs: Education as an Industry (2020-2025) (WFPHEI). These policies consistently position international students as a key performance indicator, linking them to national goals for economic growth, talent development and HEIs' reputation (Ministry of Higher Education [MOHE], 2007, 2011; MOE, 2015, 2020). Implementation of these policies is distributed among several agencies, including the Ministry of Higher Education (MOHE), Ministry of Home Affairs (MOHA), Education Malaysia Global Services (EMGS), Malaysian Qualifications Agency (MQA) and Department of Immigration (IMI).

Current literature on international student mobility and internationalisation of HEIs has largely focused on national-level policy frameworks, student mobility trends and the experiences of public HEIs (Azman & Wan, 2021; Hou & Du, 2022; James & Derrick, 2021; Wan & Abdullah, 2021). Existing evidence also suggests that many private HEIs operate within complex regulatory environments that prioritise their institutional survival, which later shapes their strategies, compliance and engagement with national policies (Anis & Islam, 2019; Azman & Wan, 2021). However, how private HEIs perceived, responded to and were influenced by

national policies on internationalisation remained under-studied. As a result, there was a critical gap in understanding the engagement between private HEIs and national internationalisation policies.

Using institutional theory, the current study addressed this gap by examining how private HEIs in Malaysia perceive national policies on internationalisation, the strategies they adopt in response and the challenges they encounter in implementation. Specifically, the study examined:

1. How do private HEIs perceive national policies aimed at supporting international student recruitment?
2. What are the institutional strategies adopted by private HEIs in response to these national policies?
3. What are the key challenges encountered by private HEIs when engaging with these national policies?

LITERATURE REVIEW

National Policy Support for International Student Recruitment

Drawing on the internationalisation literature, this study conceptualises national policy support as the extent to which state-led policies create an enabling environment for HEIs to attract, recruit and retain international students (Abdullah et al., 2017; Fenton-Smith & Gurney, 2025; Sá & Sabzalieva, 2018). Governments support international student recruitment through a range of policy mechanisms that shape both institutional recruitment capacity and the attractiveness of the destination country.

The literature consistently identifies five key domains of national policy support for international student recruitment, comprising international marketing, student visas, quality assurance, financial incentives and student support (Abdullah et al., 2017; de Wit & Altbach, 2021; Sá & Sabzalieva, 2018). These domains are also reflected in Malaysia's four major internationalisation policy documents and provide the basis for examining policy implementation in the Malaysian context in the following section.

International marketing strengthens institutional and national visibility through branding, overseas promotion, alumni networks and recruitment partnerships, helping institutions compete in increasingly crowded education markets (Hung & Yen, 2022; Oplatka & Hemsley-Brown, 2021; Pawar, 2024; Zhou et al., 2024). Student visas determine whether recruitment efforts translate into enrolment because efficient, transparent and predictable visa procedures enhance destination attractiveness, whereas administrative uncertainty discourages prospective students (Crumley-Effinger, 2023; Sá & Sabzalieva, 2018). Quality assurance supports institutional legitimacy through accreditation and recognised standards, although maintaining these standards may place greater organisational and financial demands on institutions with more limited resources (Anis & Islam, 2019). Financial incentives, including scholarships, grants and tax incentives, improve affordability and institutional competitiveness, but access is frequently

conditional and unevenly distributed (Larbi et al., 2020; Wang, 2022). Student support, including orientation, language assistance, academic guidance and wellbeing services, contributes to student satisfaction, retention and institutional reputation, making it an increasingly important component of national internationalisation strategies (Amzat et al., 2023; Fakunle, 2021).

Although these policy domains are widely recognised, their implementation is rarely uniform. Studies consistently show that policy effectiveness depends not only on policy design but also on institutional resources, governance arrangements and implementation capacity (Kafudzaruwa, 2025; Tight, 2022). Consequently, similar policy frameworks may generate different outcomes across institutions operating under different organisational and financial conditions. This issue is particularly relevant in Malaysia, where private HEIs are expected to contribute substantially to national international student recruitment while operating within a policy environment characterised by uneven implementation and unequal access to policy support (Azman & Wan, 2021). Existing research has focused largely on national policy or public universities, leaving limited understanding of how private HEIs perceive and respond to these policy conditions. This study addresses that gap by examining national policy support across the five policy domains from the perspective of Malaysian private HEIs.

National Policy Support and Implementation Gaps in Malaysia

Malaysia's higher education landscape has evolved into a dual-sector system in which private HEIs play an increasingly important role in expanding access and supporting the country's internationalisation agenda. Since the enactment of the Private HEIs Act 1996, successive reforms have encouraged the growth of private providers, positioning them as key contributors to national international student recruitment targets. However, the private sector remains highly heterogeneous, comprising private universities, university colleges and colleges that differ considerably in organisational resources and internationalisation capacity.

Malaysia's internationalisation agenda is articulated through four strategic policies: NHESP, IPHEM, MEBHE and WFPHEI. These policies progressively strengthened support across the five policy domains identified in the preceding section while assigning an increasingly prominent role to private HEIs. Table 1 summarises the evolution of these policy initiatives and their implications for private HEIs.

According to Table 1, early policies, namely NHESP and IPHEM, primarily cater to public universities, marginalising private HEIs in both consultation and design (Sirat & Wan, 2015). More recent policies, particularly WFPHEI, recognise private HEIs as strategic partners by introducing initiatives such as fast-track (green-lane) visa processing, offshore expansion, alumni-based marketing, scholarships and

Table 1
Key internationalisation policies in Malaysia and the requirements for private HEIs

Policies	NHESP 2007-2020	IPHEM 2011	MEBHE 2015-2025	WFPHEI 2020-2025
Aspiration	Regional education hub; Thrust 5 on intensifying internationalisation.	Operationalising internationalisation in six areas in line with NHESP aspiration.	International education hub; Shift 8 on global prominence.	Private HEIs as a globally competitive service industry; Chapter 7 on internationalisation.
International student enrolment target	200,000 in the country by 2020.	Align with NHESP’s target.	250,000 in Malaysia by 2025.	335,000 in private HEIs, generating RM33.5 billion by 2030.
Key policy recommendations	- Quality assurance (QA) via MQA, SETARA and MyQuest ratings. - Marketing via Education Malaysia (EM) offices overseas. - Facilitate offshore expansion.	- Marketing via EMGS and EM. - Visa streamlining via EMGS, green-lane visa for high-performing institutions and one-off visa. - Student support via international offices and staff training.	- Multiple-year visa and green-lane visa. - Marketing via myAlumni. - QA via MQA improvement.	- Green-lane visa, work visa and post-study work visa. - Recruitment licence extension and offshore expansion tied to QA. - Marketing via alumni and EM and tax incentives. - Incentives for offshore expansion and scholarships. - Stronger student support through regulation.
Private HEIs inclusion	Overemphasis on public HEIs; QA compliance and offshore expansion are expected for private HEIs without proper incentives. Only 32 private universities and university colleges were consulted.	Emphasised public HEIs; no differentiation in strategies for public and private HEIs. Only nine private HEIs were consulted.	Emphasis remains on public HEIs.	Private HEIs are central to policy narratives, but implementation benefits large, high-performing universities

Source: Compiled by the authors from multiple policy plans

enhanced student support. However, many of these initiatives remain conditional on institutional performance and quality assurance status. For example, eligibility for green-lane visas, offshore expansion and selected incentives is tied to quality ratings and regulatory requirements. Consequently, larger, well-resourced institutions such as private universities and university colleges are generally better placed to benefit from policy support than smaller providers, such as private colleges.

Policy implementation has also been disrupted by ministerial restructuring, bureaucratic overlaps and, recently, the COVID-19 pandemic. Persistent policy inconsistencies, particularly in stringent visa practices for students from certain countries, deter international student enrolment (Azman & Wan, 2021).

The evolution of Malaysia's internationalisation policies therefore reveals a persistent implementation gap between national aspirations and institutional realities. Although policy ambitions have expanded, implementation has been constrained by fragmented governance, overlapping responsibilities among agencies such as MOHE, EMGS, IMI and MQA, and inconsistent policy delivery (Azman & Wan, 2021). In addition, from an institutional theory perspective, universities are influenced not only by coercive pressures arising from government policies and regulations but also by market forces, including competition for international students, global university rankings, and the increasing commercialisation of higher

education. However, the interaction between these market forces and institutional pressures remains underexplored, particularly in developing country contexts such as Malaysia, where higher education operates within a governance system characterised by strong state involvement. Rather than responding solely to market demand, universities must simultaneously navigate regulatory requirements, quality assurance mechanisms, immigration policies, and national development priorities. Consequently, market incentives are mediated by institutional arrangements, suggesting that the effectiveness of internationalisation policies depends not only on market opportunities but also on the coherence and coordination of the broader governance framework.

Studies have also highlighted continuing challenges in visa administration, qualification recognition and the absence of clear implementation and monitoring mechanisms within recent policy frameworks (Azman & Wan, 2021; Sirat & Wan, 2015). These findings suggest that the principal issue lies less in policy intent than in institutions' uneven capacity to access and implement available policy support. While previous research has examined Malaysia's internationalisation policies primarily from policy or public university perspectives, less attention has been given to how private HEIs perceive these policies or how institutional capacity shapes implementation. This study addresses that gap.

National Policy Support and Institutional Theory

National internationalisation policies establish common expectations for HEIs, yet implementation varies because institutions differ in resources, status and operating conditions. Institutional theory explains this variation by emphasising that organisations seek legitimacy through conformity with accepted rules, norms and expectations rather than acting solely according to technical or economic rationality (DiMaggio & Powell, 1983; Furusten, 2023; Meyer & Rowan, 1977). HEIs' responses are therefore shaped not only by policy requirements but also by their capacity to translate those requirements into organisational practice.

Governments exert coercive pressures through regulation, quality assurance, funding arrangements and performance expectations. However, formal conformity does not necessarily produce substantive implementation. Recent higher education research shows that institutions may participate in accreditation and adopt visible compliance structures while responding through a mixture of substantive engagement, pragmatism and symbolic conformity (Chikazinga, 2024). Institutional responses also vary by organisational status and resource position, as universities pursue stratified legitimacy-building strategies rather than responding uniformly to common external pressures (Stensaker et al., 2019). Compliance is therefore better understood as a continuum, ranging from substantive implementation to partial or symbolic alignment.

This interaction is particularly relevant in developing and market-dependent higher education systems. Internationalisation in the Global South is shaped by national development priorities, unequal institutional capacity and wider global hierarchies, limiting the assumption that common policy frameworks will generate uniform outcomes (Kapfudzaruwa, 2025). Research beyond Western systems similarly shows that institutional responses to internationalisation depend heavily on national context, governance arrangements and organisational resources (Tight, 2022). In China, for example, the regulatory framework for transnational higher education shapes institutional access, autonomy and programme operation, illustrating how state priorities condition institutional responses (Yang, 2023).

These dynamics are especially pronounced among Malaysian private HEIs, which must secure regulatory legitimacy while remaining financially viable in a tuition-dependent and competitive market. Institutional pressures and market forces therefore operate simultaneously: HEIs are expected to comply with national requirements while investing in recruitment, quality assurance and student services needed to sustain enrolment. These pressures are unlikely to affect all providers equally. Better-resourced institutions can invest in the staff, systems and services required for substantive implementation, whereas smaller providers may struggle to absorb compliance and internationalisation costs. Institutional capacity is not static and may

evolve as institutions grow; however, where access to policy incentives is conditional on existing performance, quality ratings or organisational resources, established institutions remain better positioned to accumulate further advantages than smaller providers.

Institutional capacity thus mediates the relationship between national policy and organisational response. When policy expectations exceed available resources, symbolic compliance may emerge as a pragmatic response rather than simple resistance, allowing institutions to preserve organisational legitimacy despite constrained implementation (Karlsson-Vinkhuyzen, 2022). The contribution of this study therefore lies in showing how market dependence and unequal institutional capacity interact with legitimacy pressures to produce differentiated implementation of national internationalisation policies among Malaysian private HEIs.

METHODOLOGY

This study examined how national policies influenced international student recruitment among private HEIs in Malaysia, with the institution as the unit of analysis. As of 31 December 2023, Malaysia had 388 private HEIs, of which 300 were licensed by MOHE and MOHA to recruit international students. To ensure comparability and avoid duplication, international and local branch campuses, HEIs with expired licences and colleges operating under the centralised recruitment systems of parent institutions were excluded. This yielded a final population of 155 private HEIs.

A minimum sample size of 111 private HEIs was determined based on Krejcie and Morgan (1970), proportionately stratified by type, comprising 40 private universities, 19 private university colleges and 52 private colleges and selected through random sampling. For descriptive purposes, private universities and university colleges were grouped as larger institutions and private colleges as smaller institutions, as the former generally possess greater institutional resources.

A mixed-method survey design¹ was adopted (Creswell & Plano, 2018) because quantitative items enabled sector-wide comparison of policy perceptions, whereas open-ended responses provided contextual insights into institutional strategies and implementation challenges that could not be captured through closed-ended measures alone. A self-administered online questionnaire was developed in English and Malay, structured into two main sections. Section A identified demographic information, while Section B measured perceptions of national policy support using six Likert-scale items covering policy navigation (NP1), inter-agency coordination (NP2), the overall policy environment (NP3), resource support (NP4), monitoring (NP5) and scholarships (NP6), with two open-ended items capturing implementation

¹ The study is described as an exploratory mixed-method survey rather than an explanatory sequential design because both quantitative and qualitative data were collected concurrently in a single instrument, and the qualitative responses were used to complement and not sequentially explain the quantitative findings.

challenges and suggested solutions. These perception measures were developed from the five national policy domains identified in the literature review, comprising student visas, marketing, quality assurance, financial incentives and student support. Collectively, the items captured both the enabling conditions (policy environment, resources and scholarships) and implementation processes (policy navigation, inter-agency coordination and monitoring) associated with these domains. The five policy domains also provided the analytical framework for coding and interpreting the qualitative responses (Table 1). The questionnaire is provided in the Appendix.

Content validity of the questionnaire was established through expert reviews involving academics and practitioners in higher education policy and management. Then, a pilot test was conducted, leading to revisions for clarity and contextual relevance. The pilot questionnaire scored a Cronbach's Alpha of 0.883, indicating strong internal consistency (Hair et al., 2019).

Data collection was conducted from March 2024 to June 2024. To safeguard against non-response, 120 randomly selected institutions were invited to participate, with one eligible respondent nominated per institution. Respondents were individuals (i) at the managerial level and above and (ii) involved in international student recruitment with a strategic or operational understanding of their institution's recruitment practices and engagement with national policy. A total of 114 responses were received,

representing a 95 per cent response rate. After data screening, one case exhibiting straight-lining was removed, yielding 113 valid responses.

Quantitative data were analysed using descriptive statistics and one-way analysis of variance (ANOVA) in SPSS. Qualitative data from open-ended responses were analysed thematically to identify patterns in institutional strategies and challenges. Ethical procedures were followed throughout the study, including obtaining informed consent, ensuring voluntary participation and maintaining confidentiality.

RESULTS AND DISCUSSION

Demographic Profile of Respondents and Institutions

A total of 113 valid responses were analysed, exceeding the minimum required sample, comprising private universities (36%), university colleges (17%) and colleges (47%). Most institutions were mature providers, with 62 per cent operating for over 20 years and 79 per cent having over five years of recruitment experience. Enrolment scale, however, remained uneven. 64 per cent enrolled 100 or fewer international students, most of which were private colleges, while 12 per cent enrolling more than 1,000 students were largely private universities and private university colleges. These patterns suggest that recruitment scale is closely linked to institutional type, consistent with differences in institutional resources. The key source countries were Indonesia, China and Bangladesh and the primary recruitment methods included

agents, education exhibitions and online marketing.

The study respondents demonstrated strong expertise, with 93 per cent holding at least a bachelor’s degree (42% bachelor’s, 39% master’s and 12% PhD) and 64 per cent possessing over ten years of sector experience. Leadership perspectives were also well-represented, with 28 per cent holding top-tier positions such as vice chancellors, deputy vice chancellors, registrars and directors and the remaining 72 per cent were in mid-to-senior operational roles such as deans, heads of departments and managers. These groups occupy distinct roles in internationalisation, with senior leaders shaping institutional strategy and operational staff overseeing implementation through visa processing, agent relations, compliance and student services. The findings therefore capture both strategic and operational perspectives on national policy implementation. Comprehensive demographic details are provided in Table 2.

Perceptions of National Policy Support for Internationalisation

Figure 1 presents private HEIs’ perceptions of national policy support for international student recruitment. The findings revealed institutions’ general acknowledgement of the strategic intent of national policies (M>3.0). Monitoring mechanisms by relevant authorities such as MOHE, EMGS, MQA and IMI (NP5: 63.7%, M=3.70) were perceived as constructive quality safeguards of international student management, aligning with the policy framework’s emphasis on centralised oversight. Likewise, the general policy environment was viewed as conducive (NP3: 55.8%, M=3.50), reflecting institutional endorsement of policy intent and direction. However, this alignment weakened when policies were assessed at the operational level.

Less than half of respondents agreed that inter-agency coordination was effective (NP2: 49.6%, M=3.35), echoing critiques of fragmentation across MOHE, EMGS and

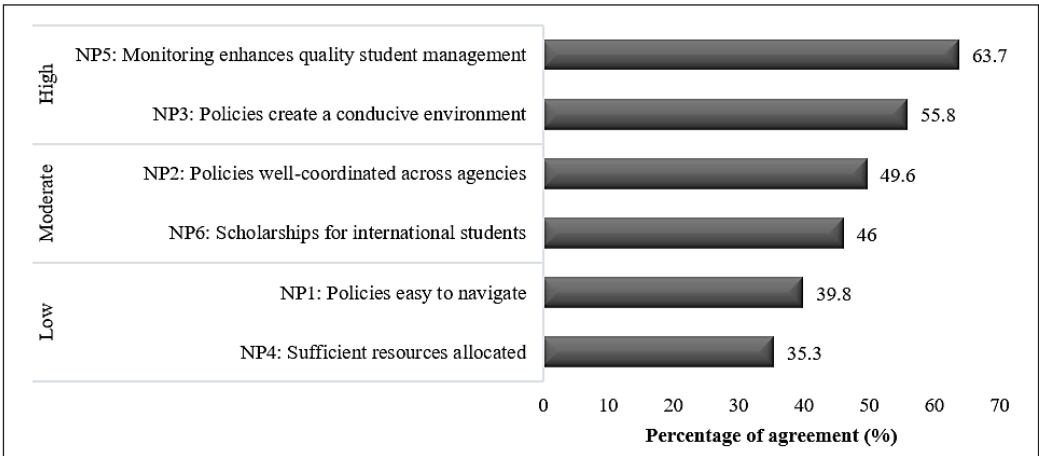


Figure 1. Perceived national policy support

Table 2
Demographic profile of the respondents and institutions

Demographic Profile		n	%
Gender	Male	58	51
	Female	55	49
Qualification	Doctor of Philosophy	14	12
	Master	44	39
	Bachelor	47	42
	Diploma	8	7
Year of service	Less than 2 years	6	5
	≤5 years	12	11
	6–10 years	23	20
	> 10 years	72	64
Designation	Top Leadership (VC/DVC/Reg/Dir)	32	28
	Deans/Heads of Department	22	19
	Managers	20	18
	Other Mid/Senior Roles	39	35
Institution	Private University	41	36
	Private University College	19	17
	Private College	53	47
Years of establishment	≤15 years	29	26
	16–20 years	14	12
	>20 years	70	62
International student recruitment experience	≤5 years	24	21
	6–10 years	36	32
	11–15 years	23	20
	16–20 years	9	8
	> 20 years	21	19
Total of international students	Minimal (0–100)	72	64
	Moderate (101–1000)	27	24
	Substantial (1001–7000)	14	12
Top three countries of origin*	Indonesia	72	-
	China	65	-
	Bangladesh	47	-
Top three recruitment methods*	Recruitment agents	27	-
	Education exhibition	24	-
	Online marketing	21	-

Note. Respondents could select up to a maximum of three options for countries/methods; frequencies exceed n=113 and percentages are not shown

IMI (Azman & Wan, 2021). Even fewer endorsed the adequacy of scholarships (NP6: 46%, M=3.25) and resource support (NP4: 35.3%, M=3.07), revealing gaps between rhetorical commitments and actual support. In addition, navigating existing policies remained complex (NP1: 39.8%, M=3.24), especially for small private HEIs, consistent with their limited inclusion during policy design and insufficient guidance.

These perceptions were broadly shared across institutional types. Welch’s ANOVA indicated no statistically significant difference in perceived national policy support, $F(2, 69.08) = 1.75, p = 0.182$ (Table 3). Comparisons between institutional types are therefore treated descriptively, and conclusions about uneven implementation rest on perception patterns and qualitative evidence rather than inferential subgroup differences.

Read against the five key policy domains identified earlier (Table 1), respondents perceived policy support as uneven. Perceptions were most favourable where policy takes a regulatory and visible form, as with quality monitoring (NP5) and the overall policy environment (NP3), and weakest where policy requires resource commitment, as with resource support (NP4) and scholarships (NP6). Perceptions were similarly low for policy navigation (NP1) and inter-agency coordination (NP2),

indicating less favourable perceptions of policy implementation processes. The open-ended responses examined below locate these gaps within specific domains, with navigation and coordination difficulties concentrated in visa processing and resource shortfalls most visible in marketing and student support.

These findings indicate a persistent gap in policy implementation. While national policies were generally considered supportive, fragmented coordination, funding shortfalls and complex policy frameworks limit their effectiveness. From an institutional theory perspective, these findings suggest partial institutionalisation. Private HEIs may adopt formal policy structures to maintain legitimacy, but the absence of consistent operational support leads to symbolic rather than substantive implementation.

Key Institutional Strategies in Addressing National Policies on Internationalisation

The thematic analysis of the study’s open-ended survey responses recorded 135 mentions of institutional strategies to operationalise internationalisation policies in five key areas, namely marketing, quality assurance, student support, student visas and financial incentives. This data is summarised in Figure 2.

Table 3
Welch’s ANOVA results for national policy support across institutional types

Construct	df1, df2	F	Significance
National Policy Support (NP)	2, 69.08	1.75	Not significant (p = 0.182)

Note. Levene’s test indicated unequal variances for NP (p = 0.002); therefore, Welch’s ANOVA was used

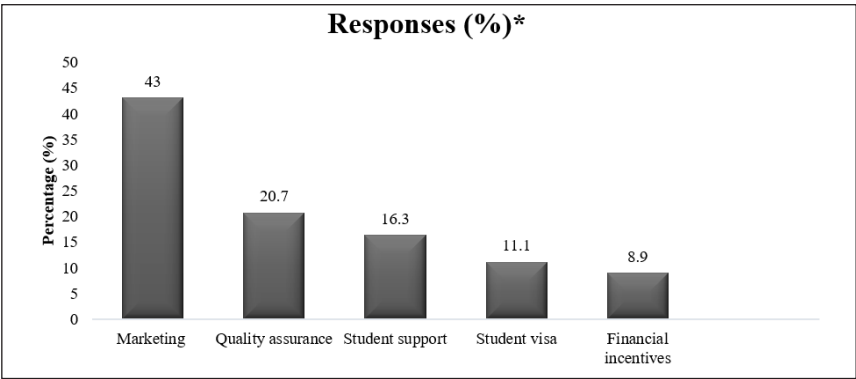


Figure 2. Key institutional strategies in response to national policies on internationalisation
Note. Percentages reflect the total strategy mentions within a theme (n=135 mentions)

Marketing

Marketing accounted for 43.0 per cent of strategies cited to strengthen international student recruitment. However, this strategy varied based on institutional capacity. Private universities and university colleges deployed resource-intensive strategies, including establishing dedicated recruitment teams, increasing recruitment budgets, participating in international fairs and collaborating with multiple recruitment agents. They also enhanced visibility through alumni success stories, virtual reality campus tours, global rankings and targeted market-specific initiatives. Better integration into policy dialogues and eligibility criteria for government incentives further aligned these institutions with national internationalisation strategies.

In contrast, private colleges, often excluded from policy consultation and support, relied on low-cost digital marketing strategies such as social media campaigns, online advertisements and virtual information sessions. Limited budgets and staffing further constrained these efforts,

with some institutions relying on alumni or recruitment agents to maintain visibility in key markets. While these strategies demonstrate an intention to support national goals, they often remain symbolic, with limited scale, reach or long-term impact.

A common strategy across institutions was the use of recruitment agents to access foreign markets. However, concerns emerged over their inconsistent quality and unethical practices, prompting calls for stronger regulatory oversight to protect student quality and institutional credibility. Notably, no national framework clearly governs the appointment, monitoring or remuneration of recruitment agents, leaving institutions to manage agent-related risks independently; this regulatory gap exposes smaller HEIs in particular to financial and reputational harm. These patterns reflect a legitimacy gap in policy design, in which resource-rich institutions are better positioned to align substantively with national goals, while others may signal symbolic compliance in the absence of meaningful inclusion or support.

Quality Assurance

Quality assurance strategies accounted for 20.7 per cent of institutional responses. Larger private HEIs pursued more expansive strategies, including industry-informed curriculum development and revisions, flexible learning pathways, micro-credentials, practicum partnerships and investment in technology infrastructure. They also strengthen teaching quality by recruiting international and adjunct lecturers, improving staff remuneration and enhancing supervisory capacity. These efforts demonstrate a strong commitment to aligning with national policies but remained heavily dependent on internal funding.

In contrast, smaller private HEIs pursued similar quality assurance goals under greater resource constraints, with limited staffing, budgets and access to industry linkages. Private HEIs reported maintaining quality assurance protocols, pursuing programme accreditation and complying with other external standards such as ISO certification. Among small private HEIs, however, these efforts often centred on displaying external compliance, performing quality assurance in form while lacking the capacity for substantive outcomes.

Student Support

A total of 16.3 per cent of institutional responses were related to student support strategies, with most of the responses coming from large private HEIs. This reflected their capacity to implement structured student support systems. They reported various self-funded initiatives,

including international student orientation programmes, language preparatory courses and tailored support services to ease academic and social adjustment. They also reported a need for better staff capacity, including the recruitment of English-proficient personnel and training in cross-cultural communication. Meanwhile, small private HEIs relied on more limited student support, typically providing basic orientation, minimal language and intercultural assistance, and general student services, with few able to offer comprehensive student support. The lack of targeted policy instruments, such as subsidies, or structured support frameworks, further widened these disparities. Consequently, HEIs remained accountable for delivering high-quality student support while absorbing the associated costs without systemic support, reinforcing the policy implementation gap.

Student Visas

Student visas were cited as an institutional strategy by 11.1 per cent of respondents and were reported mainly by smaller private HEIs. These institutions adopted compensatory mechanisms to navigate fragmented and unclear visa procedures rather than relying on centralised support mechanisms such as EMGS. Common strategies included maintaining close communication with immigration authorities, seeking direct clarification from relevant agencies, training staff on visa regulations and monitoring policy changes. These workarounds reflect institutional scepticism towards policy stability and limited confidence in inter-

agency coordination, consistent with earlier findings of policy perceptions. Several larger institutions also reported dedicated compliance teams and internal guidelines to strengthen visa management and policy implementation.

Collectively, these strategies illustrated a widening legitimacy gap in visa policy implementation. National policies assume a uniform level of institutional capacity that small private HEIs do not possess, effectively shifting the burden of visa management from central agencies to institutions.

Financial Incentives

Financial incentives emerged as 8.9 per cent of institutional strategies cited by private HEIs. Institutions reported the limited availability of direct government funding to facilitate international student recruitment and retention. Larger institutions responded with resource-intensive, self-funded strategies, including providing financial assistance, scholarships and affordable

tuition fees, while also seeking external investment and diversifying income sources.

Meanwhile, small private HEIs struggled to offer meaningful incentives without additional support, often limited to maintaining affordable tuition fees. These cost-shifting dynamics deepen systemic inequities, allowing well-resourced HEIs to advance their internationalisation agendas while marginalising under-resourced providers. When policy support is weak, self-funded financial incentives may be difficult to sustain, signalling alignment with national internationalisation goals without the capacity to deliver on them over the long term.

Persistent Challenges in Implementing National Policies on Internationalisation

The open-ended responses also recorded 223 mentions of institutional challenges private HEIs face despite the variety of strategies they adopted to support internationalisation efforts. The findings are as outlined in Figure 3.

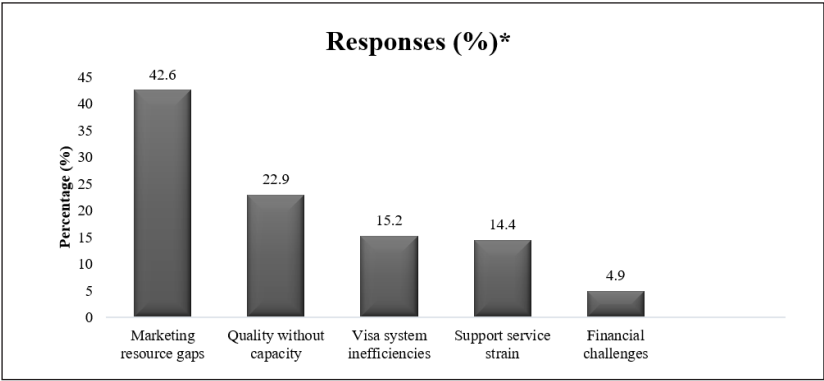


Figure 3. Key institutional challenges in response to national policies on internationalisation
Note. Percentages reflect the total challenges mentioned (n=223)

Marketing Resource Gaps

Marketing emerged as the most frequently cited challenge, with 42.6 per cent of total mentions. Financial limitations were a consistent concern. Respondents described ‘high marketing costs,’ ‘lack of financial aid,’ and ‘insufficient funds to reach multiple markets.’ Smaller private HEIs added their ‘inability to send staff overseas or build international brand presence.’ Competition was another dominant theme. Institutions reported intense competition between public and private HEIs, such as ‘competitors offering similar programmes,’ ‘well-established private universities,’ and ‘public universities offering affordable programmes.’

Another challenge was the heavy reliance on recruitment agents. Institutions highlighted difficulties in ‘identifying and retaining trustworthy agents,’ and cited issues such as ‘high commission rates’ and ‘inaccurate information from agents’ that risked their institutional credibility. Geographic and reputational disadvantages further complicate marketing efforts. East Malaysian colleges noted that ‘being located in a small-town limits [our] attractiveness’ and ‘Sabah is not marketed enough.’ Larger institutions cited strategic issues such as global ranking and the lack of strong international partners. Further compounding these issues were internal capacity constraints such as ‘limited digital marketing capabilities,’ ‘inexperienced staff,’ and a ‘lack of attractive or niche programmes.’

Quality Without Capacity

Quality assurance accounted for 22.9 per cent of all institutional challenge mentions. Private HEIs faced persistent pressure to deliver programmes that meet both regulatory requirements and the expectations of international students. A key concern was ensuring programme relevance to global job markets, with institutions noting that curricula must constantly evolve to reflect ‘fast-changing industry demands’ and ‘international employability standards.’ Yet, many highlighted limited resources to support such development, especially in emerging fields requiring ‘robust technological infrastructure’ and ‘investment in new teaching tools.’

A recurring issue was the lack of qualified academic staff, particularly those with international teaching experience. Respondents highlighted ‘limited numbers of high-quality lecturers,’ ‘difficulty in hiring staff with global exposure,’ and ‘heavy supervision burdens at the postgraduate level.’ Institutions also reported barriers to achieving and maintaining programme accreditation. Several described how ‘popular programmes remain unaccredited,’ ‘high costs and time required for accreditations,’ and ‘limited staff to manage quality assurance documentation.’ Several respondents highlighted the challenge of gaining international recognition of qualifications abroad, with one respondent noting ‘scepticism from foreign authorities, especially towards open and distance learning (ODL) qualifications.’ These recognition barriers undermine the perceived

value of Malaysian qualifications among international students.

These challenges extended to infrastructure and student support systems. Institutions mentioned 'limited facilities,' 'inadequate digital resources,' and 'lack of space for extracurricular engagement,' particularly in city-based or small campuses, with budget constraints restricting upgrades. Institutions were left to perform quality rituals such as curriculum revisions, rating pursuits and compliance exercises under conditions of underfunding and operational strain.

Visa System Inefficiencies

Visa-related issues accounted for 15.2 per cent of all mentions. Although EMGS was established to streamline visa processing, institutions described it as an ineffective and costly bottleneck. Respondents cited 'high processing fees,' 'excessive procedural steps,' and 'delays despite submitting complete documentation,' with some reporting EMGS 'rejected documents due to lack of understanding of MQA and MOHE requirements.' These issues reinforced perceptions of poor inter-agency coordination and policy navigational complexity.

Private HEIs in Sabah and Sarawak reported additional burdens stemming from 'inconsistent immigration procedures between state and federal authorities,' highlighting a persistent blind spot in policy design. Calls for 'a dedicated EMGS for East Malaysia' reflected not just logistical gaps, but an equity concern in policy delivery.

Beyond administrative burden, restrictive and shifting immigration regulations were also flagged. Institutions criticised 'changing policies,' 'inconsistent directives from IMI and MOHE,' and 'difficulties keeping up with evolving policies.' Inflexible work rights also emerged as a major disadvantage, where respondents noted that 'students prefer countries with flexible visa and work options,' and that Malaysia offered 'poor student work rights compared to other destinations.'

The case of EMGS exemplifies the policy-implementation chasm where an entity established to resolve fragmentation now represents it, producing a legitimacy deficit in which institutions lose faith in national mechanisms, particularly among smaller and regionally disadvantaged HEIs.

Support Service Strain

A total of 14.4 per cent of institutional challenges were related to student support issues. Private HEIs faced persistent challenges in managing the diverse needs of international students, revealing systemic policy blind spots in supporting student integration and success. Language barriers were the most frequently cited issue, with students struggling to 'understand lecturers or academic expectations' due to 'limited English proficiency.' These issues were compounded by 'cultural differences,' 'diverse learning styles,' and 'unfamiliar study environments.' Also, institutions reported difficulty in delivering 'adequate academic and social support' due to 'limited resources' and 'staffing constraints.'

Several respondents noted challenges in ‘selecting qualified and genuine students’ and ‘validating international qualifications.’ The absence of a centralised verification mechanism led to inconsistencies, with some reporting ‘applicants with MQA verified qualifications rejected by EMGS,’ reflecting weak inter-agency coordination between MQA, EMGS and IMI. Financial constraints compounded the issue, as institutions struggled to offer ‘competitive fees,’ ‘scholarships,’ or ‘incentives’ that could attract and retain quality students.

Financial Challenges

Financial constraints amounted to 4.9 per cent of all institutional challenges and were a cross-cutting concern among institutions, particularly in sustaining internationalisation initiatives. Institutions consistently cited ‘lack of financial aid or scholarships’ as a major barrier to attracting and retaining international students. Respondents called for ‘direct grants based on student numbers’ and ‘tax exemptions’ to enhance long-term sustainability and competitiveness.

The financial gap affected all aspects of internationalisation, such as marketing, academic staff, infrastructure, quality assurance and student support, compelling institutions, particularly small institutions, to divert internal budgets to compensate. Without targeted funding, these institutions cannot compete on scholarships or absorb rising operational costs, reinforcing institutional stratification identified earlier.

Table 4 synthesises key findings across five critical domains of internationalisation,

namely marketing, student visas, quality assurance, financial incentives and student support. While the findings indicated a broad acknowledgement of national policy support for international student recruitment, particularly in terms of quality monitoring and overall conduciveness, implementation was weakened by fragmented inter-agency coordination, limited resource support and navigation complexity.

Institutional strategies to navigate this landscape varied by institutional size and capacity. Large private HEIs deployed substantive and resource-intensive strategies such as targeted international marketing campaigns with niche programmes and agent networks, industry-aligned curriculum development, international faculty recruitment and comprehensive student support systems. In contrast, smaller HEIs relied on low-cost measures like digital marketing and minimal student support services. Due to the lack of state support, most of these initiatives were self-funded by the institutions.

Persistent operational challenges further increased inequities such as high marketing costs, unregulated agents, geographic disadvantages in East Malaysia, EMGS inefficiencies and restrictive student work rights, accreditation and qualification-recognition bottlenecks and student-support strain.

Collectively, these issues reflected three critical policy disconnects: fragmented governance shifted compliance burdens onto institutions; policy expectations outstripped the resources available to

Table 4
Misalignment between national policy support, institutional strategies and operational challenges in private HEIs

Policy Area	Perceived Policy Support	Institutional Strategies	Key Challenges	Critical Policy Disconnects
Student visa	NP2: Weak coordination	Small HEIs: Staff training, direct agency liaison.	Delays from EMGS, inconsistent federal and state regulations, policy volatility and high fees create challenges for institutions.	Fragmented governance undermines streamlining; institutions are forced to develop parallel systems.
	NP1: Complex navigation	Large HEIs: Compliance teams, internal protocols.		
Marketing	NP4: Limited resources	Small HEIs: Digital outreach, agents.	High costs, unregulated agents, geographic or reputational bias and internal capacity gaps.	National marketing favours resource-rich HEIs; structural inequity persists; symbolic compliance.
	NP6: Insufficient scholarships	Large HEIs: International fairs, niche programmes and brand-building.		
Quality assurance	NP5: Positive monitoring	Large HEIs: Industry-aligned curricula, international faculty and technological investments.	Accreditation bottlenecks, staff shortages, outdated infrastructure and qualification recognition gaps.	Regulatory exceeds capacity; compliance is often symbolic.
	NP4: Weak support	Small HEIs: Emulation with constraints.		
Financial incentives	NP6: Scholarship scarcity	Large HEIs: Scholarships, affordable fees, investors.	No public subsidies, unmet expectations and unsustainable self-funding.	Policies shift the financial burden to HEIs; limited access to financial incentives for smaller institutions; widen stratification and leave incentives symbolic.
	NP4: Funding gaps	Small HEIs: Minimal fee adjustments.		
Student support	NP3: Conducive environment	Large HEIs: Comprehensive orientation, language support, academic services.	Low English proficiency; cultural adjustment gaps; staff and resource shortages; qualifications validation issues; genuine students.	Integration goals are under-resourced; institutions absorb costs and policy oversights.
	NP1: Navigation issues	Small HEIs: Basic or minimal support.		

Source: Authors' synthesis of quantitative (NP1-NP6) and qualitative (open-ended questions) survey responses

implement them; and structural inequities in policy design favoured large private HEIs while marginalising smaller providers. These pressures have led to a proliferation of symbolic compliance, particularly among under-resourced institutions, where legitimacy was preserved through superficial alignment rather than meaningful implementation.

These patterns are not unique to Malaysia. Across non-Western higher education systems, top-down internationalisation policies are consistently conditioned by institutional capacity, producing uneven implementation. In South Korea and Iran, ambitious national internationalisation agendas have generated uneven institutional responses because weaker institutions lack the resources and administrative capacity to implement policy expectations fully, while in China, regulatory frameworks shape institutional access, autonomy and programme delivery (Jeon et al., 2023; Moshtari et al., 2023; Oladipo & Sugandi, 2022; Yang, 2023). Across these systems, common policy expectations interact with unequal institutional capacity to produce differentiated implementation, with resource-constrained institutions more likely to adopt symbolic forms of compliance. More broadly, internationalisation outcomes are mediated by national context and institutional diversity rather than policy design alone (Kapfudzaruwa, 2025; Tight, 2022). Consistent with institutional theory, universities therefore pursue differentiated legitimacy-building strategies according to their resource capacity (Stensaker et al., 2019). Malaysia's implementation gap

reflects this broader structural pattern, reinforcing the need for differentiated and capacity-sensitive policy support. This suggests that improving implementation requires more than additional policy instruments; it requires implementation mechanisms that recognise institutional diversity and differing organisational capacities.

CONCLUSION

This study examined how Malaysian private HEIs perceive, respond to and are constrained by national internationalisation policies for international student recruitment. The findings revealed a systemic misalignment between policy ambitions and institutional capacity, particularly among smaller and regionally disadvantaged HEIs.

Although national policies were generally perceived as supportive, fragmented inter-agency coordination, limited resource support and complex policy frameworks constrained effective implementation. While Welch's ANOVA found no significant differences in perceived policy support across institutional types, descriptive and qualitative findings consistently showed that smaller HEIs experienced greater challenges in policy navigation, compliance and resource mobilisation. Consequently, the inequity lay not in policy perceptions but in institutions' unequal capacity to respond. Larger HEIs adopted substantive, largely self-funded strategies, whereas smaller HEIs relied on lower-cost measures and informal workarounds, reinforcing uneven implementation.

From an institutional theory perspective, these findings suggest that uniform policy expectations, when coupled with unequal institutional capacity and market pressures, may encourage symbolic rather than substantive implementation. Addressing these structural constraints through more differentiated and capacity-sensitive policy support would strengthen the inclusiveness and effectiveness of Malaysia's internationalisation agenda.

IMPLICATIONS

The findings carry implications for both policymakers and the internal governance of private HEIs. At the policy level, national support should move beyond monitoring and compliance towards enabling infrastructure, providing differentiated support that reflects institutional capacity and regional conditions. Smaller and regionally disadvantaged HEIs require clearer guidance, easier access to resources, stronger coordination among MOHE, EMGS, IMI and MQA, potentially through a centralised inter-agency platform and decentralised EMGS regional units, and incentive criteria weighted towards improvement and need rather than existing scale, including targeted grants for quality enhancement in smaller colleges. Incentives such as green-lane visas, tax relief, scholarships and offshore expansion support should not disproportionately favour larger institutions. Aligning visa practices and post-study work rights with international benchmarks would also strengthen Malaysia's attractiveness as a study destination, while clearer national

governance of recruitment agents would protect both students and institutional credibility.

At the institutional level, smaller private HEIs should build resilience through collaboration and capability development. Resource-sharing consortia could pool the costs of international marketing, recruitment intelligence, staff training and student support, achieving economies of scale. Institutions should also invest in digital marketing competency, cross-cultural communication, visa compliance expertise and responsive student services to reduce reliance on costly external agents. Where agents remain necessary, their selection, briefing and performance monitoring should be treated as a strategic governance responsibility rather than a purely operational arrangement. Differentiation can be pursued through industry-linked micro-credentials and niche programmes, alongside targeted support services and alumni mentoring to improve student well-being and retention. Finally, structured advocacy through HEI associations can communicate operational disconnects to central agencies and give smaller institutions a voice in future policy design.

LIMITATIONS AND RECOMMENDATIONS FOR FUTURE RESEARCH

This study was limited to private HEIs' perspectives and therefore provides limited insight into public-private dynamics and wider system-level responses. The post-pandemic context may also have intensified some institutional concerns. Although

the open-ended items generated useful qualitative data, they lacked the depth of in-depth interviews. Future research should therefore adopt a multi-stakeholder approach involving public HEIs, international students, policymakers and implementing agencies. Interviews, longitudinal case studies and comparative studies with other emerging education hubs could further illuminate changes in symbolic compliance, governance, policy implementation and institutional strategy.

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APPENDIX: QUESTIONNAIRE

National Policy Items from the Survey Questionnaire

In this section, assess the national policy support for the recruitment of international students by private HEIs. Please use the scale below to indicate your agreement with each statement.

Strongly Disagree	Disagree	Neutral	Agree	Strongly Agree
1	2	3	4	5
Item	Statement			
NP1	It is easy for private higher education institutions to navigate national policies and regulations related to international student recruitment.			
NP2	National policies related to international students are well coordinated and implemented consistently across relevant government agencies.			
NP3	National policies provide a conducive environment that supports private higher education institutions’ international student recruitment.			
NP4	National policies allocate sufficient resources and funding to support the implementation of international student recruitment and management by private higher education institutions.			
NP5	The monitoring process of the authority assists private higher education institutions in maintaining the quality of international student management.			
NP6	National policies provide financial assistance or scholarships that enable eligible international students to access private higher education institutions.			
Open-ended 1	In your opinion, what are the main challenges your institution faces when trying to comply with the national policy on international student recruitment?			
Open-ended 2	Suggest possible solutions to the challenges you have identified above.			

