



INDEPENDENT
HIGHER EDUCATION
AUSTRALIA



POLICY PLATFORM 2026

INTRODUCTION

This document is Independent Higher Education Australia's (IHEA) Policy Platform, which outlines our policy positions for higher education.

A flexible, agile and responsive tertiary education system will be critical for Australia to address its skills needs now and into the future and to underpin a robust and well performing economy. It will also ensure that we have the educated workforce to bring innovative solutions to address the challenges we will need to face as a nation.

Globally and nationally, there are a number of issues that require innovation and advanced skills, which will need to be addressed through higher education. Australia needs to boost its productivity levels from recent poor performances. It needs to ensure fiscal sustainability and managing debt levels; a robust and comprehensive healthcare system, which includes addressing mental health issues, homelessness and post traumatic stress disorders as well as supporting First Nations People and the elderly to have the best quality of life; health and research infrastructure that can weather future health crises; defence requirements and cybersecurity, which are supported by cutting edge technology and strong trade and global partnerships; sustainable energy provision; and advances in technology and artificial intelligence that will constructively and effectively disrupt traditional industries and job markets.

While predictions can be made that skills in some broad areas will experience greater demand in the future, specific skills needs can be hard to predict. Many occupations that will be created and/or evolve in coming decades may be hard to envisage and also rely on technologies that have not yet been developed.



A flexible, agile and responsive, tertiary education system will be critical for Australia to address its skills needs now and into the future and to underpin a robust and well performing economy.



A higher education sector that supports Australians in gaining and maintain currency of their qualifications, skills and knowledge over the course of their working lives has to be the main priority. With cost of living pressures currently at the forefront of people's minds and pursuing paid work rather than tertiary education it's important that pathways to higher education are well supported to ensure that we have the capability to address the issues our nation is facing now and will face in the future.

The independent sector is a vital part of Australia's higher education landscape. It delivers high quality education outcomes for both domestic and international students alike. This is reflected in the excellent performance and consistently topping the rankings in the student experience surveys of the Quality Indicators for Learning and Teaching (QILT) for teaching quality; learner engagement; skills development; and overall quality.

The student centred approach of independent providers is reflected in their business and operating models and course offerings that address student and industry demand. Independent providers have strong connections to industry to keep pace with and provide leadership around rapidly evolving industry skills and knowledge demands. The education experience provided by independent providers contributes to students' employability and long term career success.

Their unwavering focus on practical knowledge based skills development prepares graduates for the workforce. Through its approach, the independent higher education sector is well positioned to create safe and respectful environments that translate to more socially responsible and respectful graduates and workplaces.

Independent providers remain focussed and resilient to deliver quality education to their students. They rebounded from the COVID 19 pandemic and have withstood the impacts of plateauing domestic student numbers, as well as significant reductions in international students being driven by government policy. International education is important to not only independent providers but to the whole higher education sector, plus the workplaces these students undertake part time jobs in whilst studying, such as hospitality, retail and parts of the gig economy.

However, the approach of independent providers needs to be reflected systemically and underpinned and fostered by a supportive and agile tertiary education system. Australia's tertiary education sector needs to support all eligible individuals to have access to education, remove barriers and not impose affordability and cost impediments.

There are a number of short term and specific reforms that can be progressed immediately. These reforms will ensure that the appropriate infrastructure is being put in place for a responsive, agile and innovative tertiary sector that will be at the forefront of meeting Australia's workforce challenges and delivering a strong economy for future generations.



The student centred approach of independent providers is reflected in their business and operating models and course offerings that address student and industry demand.

3 Pillars and 10 Reforms for A Better Higher Education Sector



PILLAR 1: PROPOSED STUDENT CENTRED REFORMS

- 1 Equity of HELP Loans**
The permanent abolition of the FEE-HELP loan fee
- 2 Embracing opportunities at independent higher education providers**
Ensure growth through accessing Commonwealth Supported Places (CSP) and programs
- 3 Lifelong learning**
Ensure that appropriate policy settings and funding incentives are in place to support lifelong learning

PILLAR 2: PROPOSED INTERNATIONAL EDUCATION REFORMS

- 4 Sustainability**
Ensure the sustainability of international education
- 5 Accessibility and Competitiveness**
Reduce fees for student visas for Australia to remain competitive
- 6 Transparency and fairness**
Access to performance data on international education agents, but no blanket bans for onshore commissions
- 7 National Benefit**
Greater pathways to permanent residency for graduates in priority disciplines

PILLAR 3: PROPOSED RED TAPE REDUCTION REFORMS

- 8 Streamlined**
Streamlined bureaucracy with creation of ATEC, TEQSA and Australian Skills Quality Authority (ASQA) to reduce burden on dual sector providers
- 9 Fairness**
Implement an equitable Tertiary Education Quality and Standards Agency (TEQSA) cost recovery model
- 10 Modernisation**
Reform copyright legislation to reduce levies on independent education providers

PILLAR 1:

PROPOSED STUDENT CENTRED REFORMS



1. Permanent abolition of the FEE-HELP loan fee

The 20 per cent FEE HELP loan fee is an inequitable and discriminatory fee or tax on education and training for independent undergraduate higher education students. The loan fee creates unnecessarily high levels of student debt, reduces economic activity of graduates and is unfairly applied based on student's choice of provider. Students in the independent sector seek quality and innovation in market driven courses. This fee also discriminates choice and the level of accessibility provided to Australian students, which are issues that were acknowledged in the Australian Universities Accord (Accord) Final Report.

Removal of the FEE HELP loan fee may result in a slightly reduced return to government in general revenue per annum but burdens independent sector students with at least \$100 million more debt than their course costs. Independent sector students are the only HELP recipients required to borrow 120 per cent of their tuition costs to pursue their educational and career goals. IHEA recommends urgently abolishing such an unfair levy on these higher education students.

Further detail about IHEA's case for the abolition of the FEE HELP loan fee can be found in our submission in Response to Australian Universities Accord Discussion Paper, which is available [here](#).



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2. Embracing opportunities at independent higher education providers through access to Commonwealth supported places and programs

All higher education students need to be supported to study in the fields of their choosing, including those that will address current and future skills needs and shortages. Funded Commonwealth Supported Places (CSPs) on a demand driven basis should be extended to all TEQSA registered higher education providers in areas that are identified as national priorities.

Such an approach is critical to meeting the Government's target to lift the tertiary attainment rate of the working age population (people with at least one Certificate III qualification or higher) from 60 per cent in 2023 to at least 80 per cent by 2050. Inherent and underpinning its recommendation to increase the tertiary attainment target is a more than doubling CSPs from 860,000 in 2022 to 1.8 million, with 25 to 34 year olds with a bachelor's degree increasing from 45 per cent to 55 per cent.

Given the stated importance of meeting the target to delivering "a skilled workforce to meet the changing needs of the economy" (p.17, Accord Final Report), achieving "growth necessary to meet future skills requirements" (p.4, Accord Final Report) will be pivotal.

This growth cannot be met solely by increasing enrolments in public universities. And building new universities is an unnecessary and excessive cost that will take considerable time. Independent providers are well placed to support students through Government programs because of their values, size, diverse delivery models, niche courses, student services and support, flexibility and responsiveness and approaches to student and staff safety.

Without the critical work and support of independent higher education providers, the ambitious growth that the Government has committed to risks being unmet. While overlooked in the Accord process, IHEA continues to support the recommendation of the 2008 Bradley Review that access to CSP be extended across the sector following the establishment of TEQSA. Access to funded places for all registered providers will deliver equity for all students.

If the Government is committed to equity and student choice, a first step is to ensure that independent higher education providers are included as part of the Managed Growth Funding and Needs based Funding Systems, which will ensure that the Government delivers on its ambitions.

The challenge for the Australian Tertiary Education Commission (ATEC) is to ensure that it includes independent higher education providers to assist in delivering the Government's agenda.

To achieve this, independent higher education providers will need more equitable access to funding streams under the Higher Education Support Act 2003 (HESA). Presently, the eligibility criteria for accessing these funds varies and they often exclude institutions that have genuine capacity to contribute to the objectives for which the funding scheme was established. In many cases, funds are made available exclusively to Table A Universities, contravening the principles of competitive neutrality.

Competitive access to Government funding will not only ensure an equitable approach that is not based on provider type but assist in realising the growth and quality outcomes that Government is seeking to achieve.



3. Ensure that appropriate policy settings and incentives are in place to support lifelong learning

Bringing the higher education and VET sectors together will be critical to underpinning and supporting lifelong learning and evolving jobs market, which are currently funded through distinct arrangements. Some forecasters have estimated that over the coming two decades Australian workers will change jobs 2.4 times and tasks within Australian jobs will change 18 per cent every decade (AlphaBeta, Future Skills, 2020). To keep pace with these changes, Australia will need a flexible and adaptable education system that will enable people to update their skills over the course of their working lives. This will be critical to Australians achieving their ambitions and becoming appropriately qualified to stay employed and for employers and the economy to have people appropriately skilled and trained to support the jobs of the future.

This was acknowledged in the Accord Final Report, which reflected that it will be paramount “to deliver new options for lifelong learning and to encourage higher education participation from new cohorts” (p.19, Accord Final Report). Actions to better integrate the sectors to support lifelong learning should include creating better and stronger pathways between vocational and higher education. This will require “modular, stackable” courses that “involve minimum volumes of learning and can be stacked to a full qualification” (p. 19, Accord Final Report) and the development of micro credentials, short courses, and upskilling opportunities to be readily available and actively supported.

To support this vision, financial support needs to be made available to students who study microcredentials at a higher education provider. This should take the form of subsidies as well as access to Higher Education Loan Payment loans. The subsidies and loan arrangements should be accessible to students who study at independent higher education providers.

Further, IHEA recommends that the Government implement a single student loan scheme across the tertiary sector with equitable settings for all students. This will be a fundamental and critical first step to support students to have more control over their journey of learning and study and to have appropriate incentives and access to upskill and reskill at every stage of their lives to connect with the type of education that is right for them at the time.



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PILLAR 2:

PROPOSED INTERNATIONAL EDUCATION REFORMS



4. Ensure sustainability of Australia's international education sector

IHEA remains opposed to the capping of international students and welcomed that the Education Services for Overseas Students Amendment (Quality and Integrity) Bill 2024 (ESOS Bill) did not pass and therefore caps did not come into effect from 1 January 2025. The proposed approach under the ESOS Bill was to cap international students at independent higher education providers more stringently than at public universities, which is discriminatory against students who wish to study at these providers. Furthermore, it does not address the issue of controlling international student numbers given the vast majority (84.0 per cent in 2023) of students were enrolled at public universities.

Australia's international education sector affords us with cultural enrichment and enduring soft diplomacy between Australia and our key global partners. It is also critical to our economy. In 2024, international education was worth \$51.5 billion, which was our fourth largest, and largest services and non resources export industry. Furthermore, international students are critical to addressing skills needs through taking on jobs in health, aged care, retail, tourism and hospitality.

In processing visas for international students to come to Australia, Ministerial Direction 111, as opposed to the detrimental Ministerial Direction 107, prioritises student visas based on the date of receipt up until the provider reaches 80 per cent of their indicative proposed cap of New Overseas Commencements. We support the principles of MD 111 which need to continue in its replacement for 2026.

The sustainability of the international education sector is contingent on student commencements remaining uncapped. However, should the Government decide to introduce caps they should follow these principles for independent higher education providers:

- That the methodology applied to determining a cap is the same for public and independent (private) higher education providers; and
- International students numbers at independent higher education providers should be maintained at least at the higher of the 2023 or 2024 levels. However, numbers must not fall below 2019 levels, which should act as a safety net.



5. Reduce fees for student visas for Australia to remain competitive

Reducing student visa fees will drive Australian market competitiveness, remove barriers to entrance and advance the narrative of welcoming students.

The ongoing increases in non-refundable student visa application charge o be the highest amongst our competitors serves as a further deterrent and negative impact on Australia's international education market. The student visa charge currently stands at \$2000, which is 182 per cent higher than it was on 30 June 2024 (\$710).

The Government needs to actively develop a plan to reduce the amount of student application visa fees. IHEA recommends reducing the visa application charge by at least 50 per cent to be competitive with major competitors as destinations for international students (~\$A167 in Canada; ~\$A285 in the United States of America; and ~ \$A1017 in the United Kingdom).

This will encourage students to apply for Australian student visas. The lower financial barriers can make studying abroad a more accessible option for a broader range of students and put an appropriate and more relevant focus on the quality of students applying, who should be assessed on their merits and aptitude as tertiary students.

Lowering the student visa application charge, will restore Australia's competitiveness as a destination by reversing the decline in demand that occurred in 2024 25 (15 per cent in higher education and 26 per cent overall), which will also serve as a productivity measure and economic prosperity for Australia.

Through part time work in health, aged care, retail, tourism and hospitality, international students will ease labour shortages in these sectors. Income earned by students is spent on housing, food, transport, and tourism related activities, which boosts productivity by increasing demand across these supply chains.

Reducing the student visa application charge will ensure Australia remains a competitive destination as well as increasing productivity and delivering benefits to the economy.



6. Greater transparency and fairness around the performance of international education agents

International education agents are central to the success and integrity of the student experience and a high performing international education sector. They are critical to the success, integrity, and student experience of the industry.

However, international students and their families need adequate protections to ensure agents are acting in the student interest. To date, arrangements have severely impacted the ability of providers to actively and effectively manage their agent network. At present, performance information about an agent is only available to providers associated with the agent. This can be detrimental to understanding and having visibility of the actions of the broader field of agent performance and inappropriate behaviour. This makes it challenging for a provider to assess new potential agent partners.

As such, IHEA supports arrangements to regulate and ensure greater transparency and accountability of agents. An immediate action is to develop a dashboard of performance data that clearly identifies which providers an agent is working with; the country of origin of the international students they are recruiting; visa success rates; and details of agent breaches and negative performance.

This will allow providers to make informed choices about the agents they enter into a commercial arrangement with. The Provider Registration and International Student Management System (PRISMS) will need to be updated to allow providers to access this important information.

In contrast, however, IHEA opposes a blanket ban on the payment of commissions to agents for onshore transfers, as this would unfairly penalise legitimate agent activity and may encourage unregulated student-agent interactions outside ESOS protections. Instead, IHEA supports a targeted restriction that prohibits commissions only when students transfer to a course at a lower AQF level, where the risk of inappropriate recruitment is greatest. This approach ensures both transparency and fairness by maintaining integrity in the system while recognising the valuable role most agents play in supporting students' educational transitions.



7. Greater pathways to permanent residency for graduates in priority disciplines

At a time when Australia's productivity needs a boost, skilled migration is a fundamental component in addressing skills shortages. Students who have been educated and received their qualifications from Australian higher education providers should be a target cohort for addressing these needs.

Ensuring transparent and accessible pathways to permanent residency will be a key component of attracting high quality international students to Australia. With current workforce and skills shortages driving industry demand, improved pathways to permanent residency will attract students into national priority fields and best utilise their expertise and skills post graduation. Improved pathways to permanent residency will also improve Australia's international competitiveness and contribute to recognition by the Australian community of the value of the international education industry.

Pathways to permanent residence for highly skilled graduates in areas of forecast long term skills shortage provides incentive to study in Australia, advances innovation, and targets industry demand. The Government extended post study work rights for international graduates that were introduced on 1 July 2023, to provide graduates with degrees in select areas of verified skill shortage an additional two years on their Temporary Graduate visa (subclass 485). These were promptly reversed when the Migration Strategy was released on 11 December 2023 as part of a broader approach to reduce migration numbers by cutting international student numbers.

IHEA recommends that the additional two years of work rights should be restored to the renamed Post Higher Education Work Visa, particularly in areas of national priority.



PILLAR 3:

PROPOSED RED TAPE REDUCTION REFORMS



8. Streamlined regulation

With the commencement of the Australian Tertiary Education Commission (ATEC), it will be imperative that ATEC has access to expertise in the day to day operation of higher education providers, including independent higher education providers. This will be critical in being able to undertake its functions and set an agenda for tertiary education.

Given that ATEC is being created within a system that already includes established regulatory, advisory and administrative agencies, councils, commissions and government departments, a clear delineation of responsibilities must be established to prevent unnecessary complexity, redundant policy, and conflicting compliance requirements.

Policy levers that are already available to one of the existing agencies (e.g. compliance reporting on issues of quality, currently sitting with TEQSA and ASQA) must not become a part of ATEC's remit.

Some lessons should be taken from new arrangements and intersection of responsibility in the student safety and wellbeing space, which is a congested regulatory space. There is currently intersection between the National Student Ombudsman, TEQSA, which is the national regulator and responsible for ensuring that the requirements of the Higher Education Standards Framework are met and the Department of Education, which is also a regulator for the purposes of the National Higher Education Code to Prevent and Respond to Gender Based Violence, and which will be enforceable from 1 January 2026.

Overlap causes uncertainty and duplication for students and providers alike. For a significant new agency with key responsibility in tertiary education, IHEA is calling upon the appointment of an ATEC

Commissioner with expertise and understanding of the independent higher education sector. This will ensure that the body with responsibility for setting Australia's higher education future, especially around pricing, funding regulation and diversity has an understanding of the operation of independent higher education providers and interests of their students. This should be supported by representation on all of ATEC's advisory committees.

TEQSA and ASQA need to reduce burden on dual sector providers

Dual sector providers are unfairly burdened by current regulatory arrangements which require registration and reporting of the same information to two regulators, ASQA and TEQSA. IHEA proposes that dual sector regulated tertiary sector providers have a single registration through TEQSA.

This should be an interim model toward putting in place a joined up tertiary education sector regulator. This reform would both reduce red tape and remove barriers to providers broadening their offerings across sectors and creating greater skills pathways for students. Dual sector providers are unfairly burdened by current regulatory models. IHEA proposes a simple reform to streamline regulation and reduce red tape through single registration via TEQSA for dual sector providers.

Dual sector providers will be critical in supporting a 'better connected tertiary education system centred on meeting skills needs including through upskilling, reskilling and other forms of lifelong learning' (p.69, Accord Final Report). The alignment of a dual sector provider's CRICOS registrations would also streamline arrangements.



9. Implement an equitable TEQSA cost recovery model

The TEQSA Cost Recovery model unfairly disadvantages independent and smaller providers and will drive increased tuition fees across the sector.

Increased tuition fees lead to increased HELP debt and effectively shifts the cost of regulation to student debt burden.

The cost recovery model needs to be reviewed to ensure an equitable distribution of regulatory costs based on provider enrolment numbers. Currently, an imbalance in the impacts of cost recovery on Australia's small independent sector which comprises only 10 per cent of student enrolments but pay a significant amount of the regulator's recovered costs. In a fairer and more equitable approach, IHEA recommends that total cost

recovery is allocated according to providers' student enrolments (Equivalent Full time Student Load, EFTSL).

This would remove the built in base cost amount that is applied to all providers and result in a more transparent and simple approach to cost recovery for regulation of quality in Australian higher education.

In parallel, TEQSA needs to ensure that it is making decisions in a timely manner as delays lead to actual and opportunity costs for providers. It is recommended that TEQSA provides transparency around the actual time it takes to assess and notify applicants of decisions versus meeting upper, statutory timeframes. This would be an important measure of its service performance, which will create a more efficient system. As such, we strongly recommend that TEQSA commit to publishing this information.



Currently, an imbalance in the impacts of cost recovery on Australia's small independent sector which comprises only 10 per cent of student enrolments but pay a significant amount of the regulator's recovered costs.



10. Reform copyright legislation to reduce levies on independent education providers

The costs of copyright licences for higher education providers are burdensome and do not reflect the real costs of online study resources. High copyright fees impact tuition fees and increased student debt. The next Australian Government needs to urgently review copyright legislation to ensure statutory

licence provisions and costs reflect modern education practices and reduce unreasonable cost imposts on education.

IHEA recommends that the license rates be independently reviewed with a view to their being parity between independent providers and public universities. Currently, the rates independent providers pay are higher. As the end user of this service, students are paying more to access the same materials that their counterparts at public universities are paying. There is no public interest reason for this differentiation.

A review needs to be progressed as a priority.



ABOUT IHEA

Independent Higher Education Australia Ltd. (IHEA) is a peak body established in 2001 to represent Australian independent (private sector) higher education providers. Our membership spans independent universities, university colleges and other institutes of higher education, all of which are registered higher education providers accredited by the national higher education regulator, TEQSA or associate members seeking registration.

There is a long tradition of independent higher education providers in Australia, with the first provider created as early as 1815, only 27 years after the first British settlement in Sydney in 1788. In total, five providers were established between 1815 and 1845 and preceding the first public university. The fifth of these was St James College, which was created in 1845. The founders of St James College were then involved in creating Moore College in 1856, and remarkably Moore College, a University College, still exists and is Australia's longest continuously operating independent higher education provider.

Our Vision is that: students, domestic and international, have open and equitable access to world class independent higher education in Australia, built on the foundations of equity, choice, and diversity.

Our Mission is to represent independent higher education and promote recognition and respect of independent providers as they contribute to Australian education, the Australian economy, and to society in general. We achieve this by promoting continuous improvement of academic and quality standards within member providers, by advocating equity for their staff and students, and by delivering services that further strengthen independent providers' reputations as innovative, sustainable, and responsive to the needs of industry and other relevant stakeholders in both higher education and vocational education and training. IHEA's commitment is to excellence, productivity and growth in independent higher education being delivered through a trusted Australian education system underpinned by equity, choice, and diversity.

IHEA members have different missions, scales, and course offerings across the full AQF range (Diplomas to Doctorates). IHEA's membership includes private universities, university colleges and not for profit and for profit institutions of higher education.



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IHEA members teach approximately 74 percent of the students in the independent sector (i.e., more than 130,000 students) and educate students in a range of disciplines, including law, agricultural science, architecture, business, accounting, tourism and hospitality, education, health sciences, theology, creative arts, information technology, and social sciences.

IHEA holds a unique position in higher education as a representative peak body of higher education providers. Membership in IHEA is only open to providers registered, or seeking registration, with the Australian regulator – TEQSA. However, some IHEA members are dual and multi sector providers who also deliver VET and/or English Language Intensive Courses for Overseas Students (ELICOS) courses.

A list of IHEA member providers is on the following page.



IHEA Member Institutions

Universities

Australian University of Theology
 Avondale University
 Bond University
 Torrens University Australia
 University of Divinity

University Colleges

ACAP University College
 Alphacrucis University College
 Australian University College of Divinity
 Excelsia University College
 Moore Theological College
 SAE University College

Institutes of Higher Education

Academies Australasia Polytechnic
 Academy of Interactive Technology
 Acknowledge Education
 Adelaide Central School of Art
 AIBI Higher Education
 AIM Business School
 Australasian Academy of Higher Education
 Australasian College of Health and Wellness
 Australian College of Christian Studies
 Australian College of Nursing
 The Australian College of Physical Education
 Australian Data and Cyber Institute
 The Australian Institute of Music
 Barton Business School
 Champion College Australia
 Christian Heritage College
 COLLARTS
 The College of Law
 Crown Institute of Higher Education
 Eastern College Australia
 Education Centre of Australia
 Asia Pacific International College
 ECA College of Health Sciences
 Higher Education Leadership Institute
 Endeavour College of Natural Health
 EQUALS International
 Governance Institute of Australia
 Holmes Institute
 IBC Education
 ICHM
 Ikon Institute of Australia

IHM Australia
 International College of Management, Sydney
 JMC Academy
 Kaplan Business School
 Kaplan Higher Education
 King's Own Institute
 Laurus Higher Education
 LCI Melbourne
 Le Cordon Bleu Australia
 Leaders Institute
 Lyons College
 Marcus Oldham College
 MIECAT
 Morling College
 Nan Tien Institute
 National Academy of Professional Studies
 National Institute of Organisation Dynamics Australia
 Navitas
 Curtin College
 Edith Cowan College
 Eynesbury College
 Deakin College
 La Trobe College Australia
 Griffith College
 SAIBT
 SIBT
 Western Sydney University International College
 Nova Higher Education
 Oxford Institute of Higher Education
 Photography Studies College
 Polytechnic Institute Australia
 Sheridan Institute of Higher Education
 Skyline Higher Education Australia
 S P Jain School of Global Management
 Sydney Institute of Higher Education
 Sydney International School of Technology and Commerce
 Sydney Met
 Southern Academy of Higher Education
 Tabor College
 The Tax Institute Higher Education
 Torrens University Australia
 Think: Colleges
 Universal Business School Sydney
 Universal Higher Education
 UoW College
 UTS College
 Wentworth Institute
 Whitecliffe Institute of Creative Arts and Technology



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