



INDEPENDENT
HIGHER EDUCATION
AUSTRALIA

IHEA SUBMISSION

**DEPARTMENT OF INDUSTRY,
SCIENCE AND RESOURCES HORIZON
EUROPE IMPLEMENTATION:
DISCUSSION PAPER**

17 September 2026

IHEA Submission

Department of Industry, Science and Resources Horizon Europe: Discussion Paper

Independent Higher Education Australia (IHEA) welcomes the opportunity to make a submission on the Department of Industry, Science and Resources (DISR) Horizon Europe: Discussion Paper, for which submissions are due by 18 September 2026.

Introduction

Australia's association with Horizon Europe represents a significant opportunity to strengthen international research collaboration, increase access to global research networks and funding, and build Australia's research and innovation capability.

From 1 January 2027, Australian entities will be able to participate in and lead eligible Horizon Europe projects under Pillar II, which encompasses research and innovation across health; culture and society; civil security; digital, industry and space; climate, energy and mobility; and food, agriculture and the environment.

IHEA's principal concern is to ensure that Australian implementation arrangements reflect the diversity of Australia's higher education sector and support effective participation by eligible providers, including private universities, university colleges and other non-university higher education providers (NUHEPs).

Implementation arrangements should ensure that the opportunities arising from Horizon Europe are accessible across Australia's research and innovation system. The discussion paper appropriately recognises that Horizon Europe extends beyond universities and researchers to industry, SMEs, not-for-profits, government research agencies and other organisations. The same principle should apply within the higher education sector, with implementation arrangements recognising the diversity of Australian higher education providers and supporting effective participation by eligible providers with relevant research capability.

DISR defines implementation as establishing the domestic and international "structures, supports and coordination arrangements" needed to help Australia maximise participation in Horizon Europe. The discussion paper states that this includes building awareness, supporting participation, strengthening European and international partnerships and representing Australian interests, and that implementation requires cooperation between government and the research sector.

This confirms an important facilitative and coordinating role for the Australian Government. While eligibility for and assessment of Horizon Europe projects are governed by the program's rules, Australian implementation arrangements can help eligible organisations identify opportunities, access information and specialist advice, form international connections and develop the capability to participate effectively. This facilitative role should extend across the diversity of Australia's higher education sector, including private universities, university colleges and NUHEPs.

Recommendations

IHEA recommends that the Australian Government:

- Ensure all eligible Australian higher education providers, including private universities, university colleges and other NUHEPs have equitable access to Australian Horizon Europe implementation support.
- Design the National Contact Point (NCP) network so that it provides accessible support across the diversity of Australia's higher education sector, including smaller and specialised higher education providers.
- Include independent higher education and its representative bodies within the proposed Tier 3 outreach and engagement network, with Tier 3 focused on outreach, awareness, navigation and feedback and specialist advice provided through appropriately expert Tier 2 NCPs or other specialist support.

- Ensure that any Australian Government support for participation in Horizon Europe is available to private universities, university colleges and other NUHEPs on the same basis as other eligible higher education providers.
- Ensure that measures used to encourage alignment with national priorities remain accessible across eligible provider types and do not unnecessarily narrow participation in other areas of Pillar II.
- Recognise the needs of smaller and specialised higher education providers when designing any assistance for developing proposals, including the time, cost and resource commitments involved in preparing applications.
- Include participation by private universities, university colleges and other NUHEPs within the measures used to assess whether Australia's Horizon Europe implementation has succeeded.

These recommendations are particularly relevant to consultation questions 1–6, 8–14, 16, 18 and 19, which address the NCP network, the role of sector organisations, financial and other support, gaps in implementation and measures of success.

Access should extend across Australian higher education

Australia's Horizon Europe implementation arrangements should seek to broaden Australia's international research capability and participation across the research and innovation system.

Australia has a diverse higher education system encompassing public and private universities, university colleges and NUHEPs. Independent providers differ considerably in size, mission and research intensity, but many have established research capability, specialist expertise, industry connections and international partnerships that can contribute to Horizon Europe collaborations.

This is particularly relevant to Pillar II. Its six clusters cover a broad range of areas extending well beyond traditional basic research, including health, culture and society, digital technologies, industry, climate and energy, agriculture and the environment. These areas intersect with teaching, applied research and industry expertise found across a wide range of Australian higher education institutions.

Within the eligibility requirements applying to Horizon Europe, Australian higher education providers with relevant capability should have an equitable opportunity to participate. Implementation arrangements should support participation across the diversity of the higher education sector, including smaller and specialised institutions.

The National Contact Point network should reach the whole sector

The proposed NCP network will be particularly important in determining whether eligible providers can participate in practice.

Tier 2 NCPs should provide specialist expertise that is accessible to providers regardless of institutional type, while the Tier 3 network should extend the reach of the NCP system through existing sector and community networks. Tier 3 should principally support outreach, awareness, navigation and feedback. Specialist advice on legal, financial, contractual, audit and compliance matters, and detailed proposal development should be provided through appropriately expert Tier 2 NCPs or other specialist support.

We do not take a fixed position on whether Tier 2 NCPs should be organised by cluster, sector or geography, or whether they should be located in government, research organisations, industry organisations or a hybrid model. The key considerations are coverage, expertise, scalability, cost and coordination, as identified in the discussion paper, together with accessibility across provider types. Performance should therefore include the reach and accessibility of NCP support across the diversity of the higher education sector, as well as aggregate activity and outcomes.

The discussion paper proposes that Tier 3 contacts could be located in peak bodies, academies, research

institutions, industry organisations, government research agencies and other relevant networks, with functions including distributing information, supporting awareness and training, helping applicants navigate Horizon Europe and identifying barriers to participation. IHEA supports this approach and recommends that Independent Higher Education Australia be explicitly included in this network.

This would provide an efficient means of reaching private universities, university colleges and other NUHEPs through existing sector networks and help ensure that information, advice and opportunities reach the diversity of Australia's higher education sector.

Given that some Horizon Europe research funding opportunities for 2027 are already open, and the discussion paper notes that forming international collaborations and consortia and developing suitable research proposals can take several months, NCP and outreach arrangements should be established and communicated across the sector as soon as possible.

Building capability as well as drawing on existing capability

The discussion paper recognises that implementation needs to balance drawing on existing expertise with broadening capability across the wider research and innovation ecosystem. This should be an explicit objective of implementation.

The discussion paper also recognises that some institutions already have strong international partnerships, financial support and knowledge of Horizon Europe and proposes that the NCP network complement those strengths while focusing on areas where additional capability is needed.

The NCP network should therefore draw on established expertise while building capability among institutions with the potential to participate but less experience with programs of this scale. This could include assistance with identifying relevant funding opportunities, finding consortium partners, proposal development, European financial and legal requirements, research management and project administration.

Success should ultimately include not simply maximising the immediate number of successful Australian applications but increasing the number and diversity of Australian institutions capable of competing successfully over time.

Alignment with national priorities should remain inclusive

The discussion paper seeks views on how Australian participation can be encouraged in Horizon Europe research funding opportunities that are aligned with the National Science and Research Priorities and the Future Made in Australia agenda. IHEA supports the use of implementation support to help applicants identify opportunities align with national priorities.

Any prioritisation or targeted Australian support should remain accessible across eligible provider types and should be designed carefully so that it does not unnecessarily narrow participation. This is consistent with the discussion paper's recognition of the trade-off that a narrow set of priorities may focus effort but discourage applications in other areas that could have a high prospect of success.

Any financial assistance should be available across eligible provider types

The same principle should apply to any Australian Government financial support introduced to encourage participation.

The discussion paper recognises that the time, cost and resource commitments involved in preparing a competitive Horizon Europe application can deter participation by smaller organisations, regional universities and SMEs. It notes that application-stage support could reduce these barriers, broaden participation and help entities develop expertise in proposal writing, international partnerships and Horizon Europe requirements.

IHEA supports the discussion paper's stated objective of promoting equitable participation and building capability across regions and sectors. If application-stage assistance is introduced, it should be available across eligible

higher education provider types, including private universities, university colleges and other NUHEPs, subject to the requirements established for that assistance.

Application–stage assistance may be particularly valuable to smaller and specialised higher education providers seeking to build experience with Horizon Europe, including in proposal development, international partnership formation and program requirements.

Similarly, if Government elects to provide complementary assistance to successful Australian participants, that assistance should be available across eligible provider types, subject to the requirements established for the assistance.

Measuring broad participation

The Government proposes to measure implementation success through indicators including the number and success rate of Australian applications, funding secured, numbers of participating entities and participation by SMEs, universities, research organisations and government entities. However, it is recommended that there be greater granularity within the higher education component of these measures.

Government should monitor participation and success across different types and sizes of higher education providers, including private universities, university colleges and other NUHEPs. Disaggregating higher education participation by provider type would provide a clearer picture of the reach of Horizon Europe across Australia’s diverse higher education system.

This would also help identify where further outreach or capability building may be warranted.

Conclusion

Australia’s association with Horizon Europe provides an opportunity both to draw on established research expertise and to broaden Australia’s capability to participate in international research and innovation.

Private universities, university colleges and other NUHEPs form part of Australia’s nationally regulated higher education system and include institutions with specialist research capability, strong industry connections and expertise relevant to the Pillar II clusters. These providers should have the same opportunity to participate as other eligible Australian higher education providers. Australian implementation arrangements should ensure they have equal access to information, advice and support to help them participate effectively.

Australian implementation arrangements should therefore facilitate participation across the full diversity of Australia’s higher education sector. This should be reflected in the NCP network, outreach arrangements, any assistance for developing proposals, any complementary Australian funding and the measures used to assess success.

Who We Are

Independent Higher Education Australia Ltd. (IHEA) is a peak body established in 2001 to represent Australian independent (private sector) higher education institutions. Our membership spans independent universities, University Colleges and other institutes of higher education that are registered with the national higher education regulator, TEQSA, as well as 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 independent providers were established between 1815 and 1845, before the establishment of Australia's 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 institutions, 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 has 94 members, which rises to over 120 if providers' constituent colleges and subsidiaries are included.

IHEA's 93 members comprise:

- Five private Universities (Australian University of Theology, Avondale University, Bond University, Torrens University and University of Divinity).
- Six University Colleges (ACAP University College, Australian University College of Divinity, Alphacrucis University College, Excelsia University College, Moore Theological College and SAE University College).
- Seventy-nine not-for-profit and for-profit institutions of higher education (which includes twelve full or partially self-accrediting institutes); and related corporate entities.
- Three corporate owners of higher education providers.

IHEA members teach approximately 74 percent of the students in the independent sector (i.e., more than 140,000 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, human services 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.

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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 Chiropractic College
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
Campion College Australia
Central Institute of Technology and Innovation
Christian Heritage College
CIHE Australia
COLLARTS
The College of Law
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
Fairmont College Australia
Gateway Business College
Governance Institute of Australia
Holmes Institute
IBC Education

iCareers Institute

ICHM

Ikon Institute of Australia

International College of Management, Sydney

International School of Global Leaders

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 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

Photography Studies College

Polytechnic Institute Australia

Russo Business School

Sheridan Institute of Higher Education

Skyline Higher Education Australia

S P Jain School of Global Management

Stanley College

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

Key Findings.

Independent higher education is an important contributor to Australia's economic activity.

The sector contributes



**\$8.2
billion**

to Australia's GDP



**196,000
students**



61%

International*



39%

Domestic*

*Shares based on EFTSL

For every **\$3** the sector directly contributes to GDP, it supports around **\$1** of additional value added elsewhere in the economy

Contributes



**\$3.0
billion**

in government tax revenue

International students contribute



**\$7.6
billion**

to Australia's GDP

Increases output by



\$14.0 billion

Supports



**18,906
FTEs**

across the economy

Contributes



\$13.1 billion

to total incomes

The sector contributes to the Australian economy through several major impact channels:



institutional
spending



international
student living
expenses



expenditure of
visiting friends
and family



net increase in
student labour
supply



graduate labour
productivity
uplift



research driven
productivity
uplift