INDEPENDENT HIGHER EDUCATION AUSTRALIA

IHEA SUBMISSION

ATEC STATEMENT OF STRATEGIC PRIORITIES 2027–28 CONSULTATION

30 October 2026

IHEA Submission

ATEC Statement of Strategic Priorities 2027–28 Consultation

Independent Higher Education Australia (IHEA) welcomes the opportunity to comment on the Australian Tertiary Education Commission's (ATEC) Statement of Strategic Priorities 2027–28 Consultation Paper, for which submissions are due by 30 October 2026.

Introduction

Independent Higher Education Australia (IHEA) welcomes the opportunity to provide feedback on the Australian Tertiary Education Commission's (ATEC) proposed Statement of Strategic Priorities (SSP) for 2027–28.

IHEA supports the intention that the Statement of Strategic Priorities 2027–28 (SSP) provide clear system–level direction while retaining sufficient flexibility for providers to respond according to their mission, operating context and strategic vision. This principle is particularly important in a higher education system comprising public universities, private universities, University Colleges and a diverse range of non–university higher education providers (NUHEPs).

ATEC's consultation paper recognises that the SSP should balance ambition with stability and practicality and allow providers to focus on priorities most relevant to their mission and operating context. IHEA strongly supports this approach. The final SSP should make equally clear that system stewardship must recognise and make effective use of the full diversity of Australia's regulated higher education sector, rather than defaulting to institutional models, funding arrangements or policy settings designed principally around public universities.

Independent providers operate under the same national quality assurance framework administered by the Tertiary Education Quality and Standards Agency (TEQSA), but under materially different funding, governance and business models. Many are specialised, industry connected and comparatively small, and many serve cohorts and disciplines central to national workforce and participation objectives. These differences should be treated as a source of system diversity and capability, not as a reason for independent providers to be peripheral to ATEC's stewardship.

Recommendations

For the SSP, IHEA recommends clearer recognition of provider diversity, proportionality and competitive neutrality This entails removal of unnecessary barriers to student participation and choice and equitable access to Commonwealth support according to student need.

ATEC should use its research and advisory functions to examine these issues and recommend reforms to government. The priorities should be implemented flexibly according to provider mission, scale and operating context.

In particular, IHEA's existing policy positions support the following refinements:

- Embed provider diversity, competitive neutrality and proportionality within the outcome of system quality, diversity and resilience, recognising different missions, scales, funding models and modes of delivery and valuing providers according to quality and outcomes rather than historical hierarchy.
- Establish provider neutral access to Commonwealth support as a strategic objective: students with comparable needs should not face unjustified differences in access to Commonwealth Supported Places, needs–based funding or other assistance solely because of provider classification, subject to transparent quality, accountability and fiscal criteria.
- Recognise the contribution of independent providers to workforce priorities and ensure system planning draws on the capabilities of the whole regulated sector.
- Strengthen the joined–up tertiary system priority around learner centred funding, portable support,

transparent credit recognition, cross–sector data and regulatory alignment, while preserving the distinct purposes and strengths of VET and higher education. Call for the removal of the 20 per cent undergraduate FEE–HELP loan fee as a barrier to equitable student choice.

- Ensure quality teaching priorities support innovation and continuous improvement without duplicating TEQSA's quality assurance role or imposing standardised institutional models.
- Frame research and research training priorities so that specialised and independent research–capable institutions can contribute according to mission and areas of strength.
- Ensure global engagement and international education settings are transparent and provider–neutral and recognise the importance of international education to independent providers.
- Use the 2027–28 work program to identify practical opportunities to streamline regulatory and reporting burden across ATEC, TEQSA, ASQA, the Department of Education, the National Student Ombudsman and related frameworks, including duplication affecting dual–sector providers.
- Ensure ATEC's advisory structures, consultation processes, data and system reporting visibly include the independent higher education sector.

Draft outcomes

IHEA particularly supports the proposed outcome that the tertiary education sector should be "sustainable, diverse and resilient" and operate as a dynamic and efficient system that supports quality and innovation. This outcome should be given practical effect throughout the SSP.

Diversity should encompass diversity of provider type, mission, scale, ownership, specialisation, pedagogy and delivery model. A system in which providers make differentiated contributions is more capable of responding to changing student demand, workforce needs, regional circumstances and emerging industries.

The final SSP should therefore avoid treating diversity as an abstract system characteristic while applying priorities in ways that favour a single institutional model. ATEC's stewardship should recognise that independent providers may contribute differently from large public universities while still advancing the same system–level outcomes.

This is also important for mission–based compacts. The statutory compact framework applies to Table A and Table B providers; it should not be described as applying generally to all independent universities or NUHEPs. For Table B institutions, expectations should be proportionate to institutional mission, scale, funding arrangements and operating context. Compacts should enable genuine differentiation and should not become a de facto quality assurance mechanism duplicating TEQSA.

With respect to equitable access, participation, progression, retention, completion and attainment, student need should be central to equity policy, while recognising that circumstances, institutional resources and provider funding settings can affect student outcomes. Equity policy should seek to reduce barriers to participation and success, including unjustified differences in Commonwealth funding and student support between provider categories.

ATEC's analysis should therefore examine whether students with comparable needs receive comparable opportunities for financial and other support across provider categories, and whether provider–based eligibility rules create unjustified barriers or materially different treatment.

Provider classification should not result in students with comparable needs having materially different access to Commonwealth support. Independent providers educate students from under–represented cohorts and frequently use flexible delivery, intensive student support, smaller learning environments and strong industry engagement to support participation and completion.

The SSP should recognise these contributions and establish a clear student–centred principle: Commonwealth

support should follow student need and demonstrated provider capability rather than ownership or historical classification alone. ATEC should use its research and advisory functions to examine barriers to student choice and recommend reforms to government, recognising that decisions on funding eligibility and expenditure rest with government and Parliament.

Implementation of the draft outcome on First Nations self–determination and success should include First Nations leadership and engagement at independent providers where relevant, as well as recognise differing provider contexts.

In the areas of workforce demand, independent providers make a material contribution in the areas of health, education, technology, psychology, business and community services. ATEC's approach to workforce planning should be provider neutral. National and regional priorities should identify the skills and outcomes required, while allowing different provider types to demonstrate how they can contribute.

The proposed outcome of research and knowledge for public benefit should recognise specialised research and research training contributions beyond large research–intensive public universities, and access to collaborative infrastructure and partnerships on appropriate terms.

Strategic priorities

National, regional and First Nations priorities

The proposed priorities identify care services, education, digital technologies, sovereign capability and food security, housing and construction, and the net zero transition as areas of national significance.

The final SSP should expressly recognise that meeting these needs will require the capacity of the whole higher education sector. Provider type should not be used as a proxy for capability. Where independent providers have demonstrated quality, workforce alignment and capacity, they should be visible within ATEC's system planning, analysis and advice.

ATEC should also ensure that place–based approaches recognise providers operating through metropolitan, regional, online and multi–campus models. Regional contribution should be assessed by the students and communities served, not solely by the location or institutional category of the provider.

Implementation of the priority of strengthening First Nations leadership, participation and success should recognise the different scale, missions and student cohorts of providers and support proportionate approaches that enable all providers to contribute meaningfully.

ATEC's engagement and evidence gathering should include independent providers with relevant experience, partnerships and First Nations student cohorts so that system advice reflects the breadth of higher education provision.

Equity and Commonwealth support

Furthermore, the equity priority should be explicitly student–centred. IHEA's previous submissions have highlighted that students with comparable educational needs may face different access to Commonwealth support depending on provider classification. The SSP should identify equitable access to support as a strategic objective and enable ATEC to examine whether current arrangements unnecessarily constrain participation and choice at appropriately regulated independent providers.

The SSP does not itself determine eligibility for Commonwealth funding. It can, however, direct ATEC's research and advice towards provider–neutral access to Commonwealth Supported Places, needs–based funding and student assistance, subject to transparent eligibility, quality, accountability and budgetary considerations. Any proposals to change funding entitlements would require decisions through the relevant legislative and funding processes.

In particular, IHEA seeks removal of the 20 per cent FEE–HELP loan fee on eligible undergraduate courses at non–exempt providers, which increases the debt incurred by affected students without increasing the amount paid to the provider. The fee is not a general charge on all FEE–HELP borrowers and does not apply to postgraduate courses.

IHEA also seeks a pathway for appropriately qualified TEQSA–registered independent providers to access Commonwealth Supported Places and needs–based support on objective, provider–neutral terms. These are student affordability and choice issues, as well as matters of competitive neutrality. ATEC should examine and advise government on these reforms as part of its equity and joined–up system priorities.

Quality teaching

IHEA supports the focus on high quality teaching, innovation and evidence–based practice, including the responsible use of artificial intelligence. The priority should recognise that excellence in teaching can be achieved through different institutional and pedagogical models.

ATEC's work on teaching quality should complement, rather than duplicate, TEQSA's statutory quality assurance role. The SSP should focus ATEC on system–level evidence, dissemination of effective practice and removal of barriers to innovation, rather than creating additional quasi–regulatory expectations or standardised measures

that cut across the Higher Education Standards Framework.

Measures of teaching quality should also be capable of reflecting the strengths of smaller and specialised providers, including close student engagement, industry–integrated curricula, practitioner teaching models and flexible delivery.

A joined–up tertiary system

IHEA strongly supports the objective of a more joined–up, learner–centred tertiary system. As IHEA has previously emphasised, this should mean functional integration rather than structural merger.

Learners should be able to move more seamlessly between VET and higher education while the distinctive strengths of each sector and the diversity of providers are preserved. Independent providers should be integral to this work. Many operate across qualification levels, maintain articulation arrangements with VET providers, or deliver specialised pathways that support upskilling and reskilling.

The National Credit Recognition Framework should establish nationally agreed principles, common terminology and transparent credit and recognition arrangements in both directions between VET and higher education, while preserving provider autonomy over academic standards and qualification outcomes.

A more joined–up system should expand learner choice and mobility rather than channel students towards particular provider categories. It should also improve information for learners about likely credit outcomes and pathways before they enrol.

IHEA also considers that the joined–up system priority should address funding and loan settings that impede learner choice and movement across sectors. IHEA has proposed examination of a lifelong learning entitlement: a portable income–contingent financing arrangement that supports repeated upskilling and reskilling. This is a longer–term policy option requiring separate design and fiscal assessment, rather than a reform established by the SSP.

More immediately, ATEC should advise on the effects of provider–based eligibility for Commonwealth Supported Places and needs–based funding, including in national–priority disciplines, and on removing the 20 per cent undergraduate FEE–HELP loan fee for affected students. Access should be considered against transparent criteria for educational quality, student outcomes, accountability and public value, not TEQSA registration alone. These issues directly affect affordability, learner choice, competitive neutrality and the capacity of the whole higher education sector to contribute to attainment growth.

The joined–up tertiary system priority should also address regulatory alignment for dual–sector providers, while recognising that detailed VET funding settings are outside this consultation's scope. Priorities include reducing duplicated engagement with TEQSA and ASQA, using existing assurance and data where appropriate, and better coordinating higher education and VET information requirements.

Research

The proposed research priority emphasises the role of universities. The final SSP should also recognise that research and research training capability exists across independent universities and other research–capable institutions, often in specialised disciplines.

For independent and smaller universities in particular, ATEC should support research specialisation and institutional differentiation. Expectations should recognise areas of competitive or comparative strength rather than assume that all institutions should maintain the scale or breadth of research portfolios characteristic of large research–intensive universities.

ATEC's research policy advice should consider access to shared national research infrastructure, research partnerships and other mechanisms enabling smaller and specialised institutions to contribute without replicating costly infrastructure. Its work should complement, not duplicate, the responsibilities of the Australian Research

Council and other research funding agencies.

Global engagement

The final SSP should recognise the diversity of providers that contribute to Australia's international education system and the importance of a stable, predictable and internationally competitive policy environment.

International education is not merely an export activity: for many independent higher education providers, it supports institutional sustainability, educational diversity, workforce development, global knowledge exchange and enduring international relationships.

IHEA supports transparent, evidence–based and sustainable international education planning. Where governments adopt enrolment management or allocation arrangements, ATEC's system planning and advice should consider demonstrated educational quality, student outcomes, institutional capability, regulatory compliance and capacity to support international students. Allocation criteria and methodologies should be transparent, justified by relevant policy objectives and applied fairly across provider categories, taking account of different provider circumstances.

Provider ownership, institutional size, historical enrolment patterns or the absence of a mission–based compact should not be used as proxies for educational quality or capability. Independent higher education providers should be meaningfully consulted alongside public universities.

ATEC should also consider the cumulative effects of changes to international education, migration and student visa policy on institutional sustainability, Australia's international competitiveness and prospective students' confidence in Australian higher education. Its stewardship and advisory functions should support greater policy coherence, appropriate transition arrangements and meaningful consultation with independent higher education providers before significant changes affecting international education are implemented.

Collaboration

IHEA supports the emphasis on collaboration across providers, industry and communities, particularly in niche disciplines and thin markets. Independent providers frequently have strong employer and professional links and can respond quickly to emerging skills needs.

ATEC should encourage collaboration without assuming that collaboration requires institutional convergence. Partnerships should preserve provider autonomy and allow institutions to contribute according to their distinctive strengths.

Student experience and safety

With respect to the objective of safe, inclusive and supportive learning environments, the SSP should recognise the substantial regulatory and complaints–handling architecture already applying to higher education providers, including TEQSA requirements and the National Student Ombudsman.

ATEC's role should focus on system–level evidence and coordination. New performance expectations should be proportionate and should avoid duplicating existing regulatory, reporting and complaints frameworks.

Mission based compacts and the SSP

The consultation paper appropriately states that the SSP should allow providers to focus on priorities most relevant to their mission, operating context and strategic vision. This principle should be prominently retained in the final SSP and reflected in its implementation.

IHEA has previously emphasised that a one–size–fits–all approach to mission–based compacts would not be appropriate. The compact framework covers Table A and Table B providers, including relevant independent Table B universities, but not NUHEPs generally. Expectations should reflect mission, scale and funding arrangements and should not simply replicate those designed for large research–intensive universities.

The SSP should maintain a clear distinction between the providers subject to statutory mission–based compacts and the wider higher education sector affected by ATEC's stewardship, advice, data and planning functions. NUHEPs should not acquire compact–like obligations indirectly through system priorities without a clear statutory basis, consultation and consideration of proportionality. ATEC should separately examine whether independent providers have equitable opportunities to participate in Commonwealth support programs.

Performance indicators should measure contribution to agreed outcomes rather than reward institutional scale. Indicators should be capable of recognising specialised missions and should avoid creating incentives for providers to converge towards a common institutional model.

The consultation paper proposes that ATEC's performance framework use system–level and provider–level indicators. IHEA supports transparent reporting but recommends that provider–level measures be limited to matters within the applicable statutory framework, draw on existing data where possible, and not create new compact obligations for NUHEPs.

ATEC Workplan 2027–28

IHEA notes that the SSP is a strategic document with a two–year horizon, while ATEC's strategic plan and work plan are separate instruments. Its priorities should inform subsequent work on needs–based funding, teaching quality, a more joined–up tertiary system, credit recognition, research policy, data and stakeholder engagement. IHEA therefore identifies below matters that should be reflected in ATEC's ensuing work program, rather than treating them as measures already proposed in this consultation paper.

From the perspective of independent higher education providers, IHEA considers that ATEC's additional work should place particular emphasis on the following areas:

- **Regulatory streamlining and data:** Undertake a whole–of–system review of duplicated or overlapping reporting, data, assurance and consultation requirements across ATEC, TEQSA, ASQA, the Department of Education, the National Student Ombudsman and related Commonwealth frameworks. This should include practical steps for dual–sector providers, such as greater mutual recognition and single–point reporting, alongside a more integrated cross–sector evidence base that avoids unnecessary new provider reporting burdens.
- **Equity, student access and provider–neutral Commonwealth support:** Examine whether funding, loan and student–support settings produce unjustified differences for students with comparable needs. Priorities should include advice on removing the 20 per cent undergraduate FEE–HELP loan fee for affected borrowers and developing transparent pathways for eligible independent providers to participate in Commonwealth Supported Places and needs–based funding, subject to quality, accountability and fiscal safeguards.
- **Provider diversity, system capacity and representation:** Develop a robust evidence base on the contribution, capacity and student cohorts of independent higher education providers so that system planning is not based primarily on public university data or institutional models and ensure ATEC advisory committees and stakeholder engagement mechanisms include appropriate independent–sector expertise.
- **Joined–up pathways, funding and lifelong learning:** Examine options for a more portable, learner–centred funding and loan architecture across VET and higher education, including the feasibility of a lifelong learning entitlement, and support implementation of the National Credit Recognition Framework with transparent information on credit, recognition of prior learning and articulation pathways.
- **Transparent and proportionate system planning:** Ensure methodologies and evidence used in student place planning, international education advice and other allocation recommendations are transparent, objective and appropriate to the relevant statutory powers. Performance indicators should reflect

mission, scale and operating context without privileging institutional size or research intensity.

Consultation and representation

ATEC's effectiveness as a system steward will depend on the breadth and quality of its engagement. IHEA has consistently argued that consultation should reflect the diversity of Australia's higher education system and include independent providers and their representative bodies.

The draft Workplan proposes a suite of advisory committees and a stakeholder engagement strategy. IHEA considers these mechanisms important to ensuring that independent higher education perspectives are reflected across ATEC's work, rather than consultation being limited to matters specifically identified as affecting independent providers.

ATEC's data, research and State of the Tertiary Education System reporting should similarly provide appropriate visibility of provider categories. Where data are reported only at whole–of–sector level, significant differences in funding models, student cohorts, specialisation and operating context can be obscured.

Conclusion

The proposed 2027–28 SSP focuses on equity, workforce capability, quality teaching, a joined–up tertiary system, research, global engagement, collaboration, student experience and system diversity. IHEA seeks more explicit recognition of provider–neutral access to Commonwealth support, the removal of the undergraduate FEE–HELP loan fee, and the distinct contribution of independent higher education providers.

However, for the SSP to operate effectively across Australia's contemporary higher education system, its implementation must recognise that the sector is not synonymous with the public university system. Independent universities, University Colleges and NUHEPs operate under the national quality framework and make distinctive contributions to student choice, workforce development, international education, teaching innovation, research and community needs.

The final SSP should therefore embed provider diversity, proportionality and provider–neutral system stewardship across its priorities. This would support ATEC's stated intention to allow providers to respond according to their mission and operating context, while ensuring the full capability of Australia's higher education system is available to meet national objectives.

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 93 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

IHEA INDEPENDENT HIGHER EDUCATION AUSTRALIA

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

Economic contribution of independent higher education

