INDEPENDENT HIGHER EDUCATION AUSTRALIA

IHEA SUBMISSION

CONSULTATION ON DRAFT HIGHER EDUCATION SUPPORT (COMMONWEALTH GRANT SCHEME) GUIDELINES 2026

18 November 2026

IHEA Submission
Consultation on Draft Higher Education Support (Commonwealth Grant Scheme) Guidelines 2026

Independent Higher Education Australia (IHEA) welcomes the opportunity to comment on the Department of Education's (DoE) draft Higher Education Support (Commonwealth Grant Scheme) Guidelines 2026 (the Guidelines), for which submissions are due by 18 November 2026.

Introduction

IHEA understands that the Guidelines largely carry forward existing Commonwealth Grant Scheme (CGS) policy while implementing the Universities Accord (Opening the Doors of Opportunity) Act 2026. Our principal concern is how the new arrangements will work for independent higher education providers and their students from 1 January 2027.

The central implementation questions for independent providers are which courses may be supported, how course–specific allocations can be adjusted as enrolments change, and how grant payments will be reconciled. These matters are especially important for smaller and specialist providers with limited capacity to absorb funding uncertainty.

Recommendations

- Explain why 35 non–Table A providers specified in the 2020 Guidelines have been omitted from draft section 7 despite remaining registered with TEQSA. Publish provider specific reasons for each omission, identify any implications for future CGS funding eligibility and establish a transparent process for inclusion or re–inclusion.
- Identify whether the revised priority classes affect courses currently funded at independent providers, explain any exclusions and their consequences in the final Explanatory Statement, and establish a process for seeking consideration of additional priority classes.
- Explain how 2027 allocations will accommodate eligible continuing Commonwealth–supported students, consistent with section 36–25 of the *Higher Education Support Act 2003* (HESA).
- Establish a clear process, criteria and timeframes for independent providers to request adjustments to allocations during 2027, where permitted by legislation.
- Explain how providers can confirm course eligibility before final student data is verified, and how data corrections and payment reconciliations will be managed.
- Clarify the scope of the clinical placement conditions in section 14, amend the drafting if coverage is intended to be limited to Commonwealth–supported students, and ensure information requests under section 15 are proportionate.

What the Guidelines mean for independent providers

The existing CGS Guidelines already identify eligible non–Table A providers and set national priorities, some of which were expressly time limited. These restrictions are not new. The 2027 funding framework replaces the former CGS funding–agreement approach with statutory allocations. For non–Table A providers, the Australian Tertiary Education Commission (ATEC) must specify places by priority class of course. IHEA's concern is how those allocations operate in practice, especially when student demand or continuing–student requirements change.

Explain changes to provider eligibility (section 7)

The expansion of the list occurred largely in the context of the Commonwealth's COVID–19 higher education relief and recovery measures. In early 2021, the Commonwealth Grant Scheme Guidelines listed 28 non–Table A

providers. The Commonwealth Grant Scheme Guidelines Amendment (National Priorities and Other Matters) 2021, which commenced on 30 July 2021, added 24 providers, increasing the total to 52, and broadened the national priority for retraining and upskilling in 2021. These changes followed the introduction of subsidised short courses under the 2020 Higher Education Relief Package and subsequent measures under the Job–ready Graduates reforms. They also coincided with additional Commonwealth support announced in April 2021 for non–university higher education providers affected by COVID–19 and international border closures, including funding for short courses leading to Undergraduate Certificates and Graduate Certificates.

In 2021, 2,500 short–course Commonwealth–supported places had initially been allocated to non–university higher education providers, with a further 5,000 places announced on 30 April 2021 as part of a $26.1 million package to support providers affected by COVID–19 and international border closures. A December 2025 amendment added the National Institute of Dramatic Art, bringing the list to 53.

Of the 35 providers omitted from the draft 2026 Guidelines, 23 were added through the July 2021 amendment, while the remaining 12 were already listed before that amendment. This history helps explain the breadth of the current list but does not establish that every newly listed provider received a grant, or that all proposed exclusions relate to expired COVID–19 initiatives. DoE should distinguish temporary funding from ongoing statutory eligibility in its provider–by–provider explanation.

Providers specified in the current and proposed Guidelines

The current 2020 Guidelines, as amended, have 53 entries and draft section 7 has 18. Yellow highlighting marks the 35 entries that do not have a corresponding entry in the draft. TEQSA's National Register confirms that all 35 remain registered. Four have changed legal names; the other 31 continue under their listed legal names (some with updated trading names). This comparison is of eligibility lists, not of the number of providers with funded CGS places.

Current Commonwealth Grant Scheme Guidelines 2020 (as amended) — 53 providers (section 8)

(a) Avondale University College Limited	(zb) TAFE SA
(b) Torrens University Australia Ltd	(zc) Australian College of Theology Limited
(c) Bond University Limited	(zd) Colleges of Business and Technology (WA) Pty Ltd
(d) University of Divinity	(ze) Crown Institute of Higher Education Pty Ltd
(e) Tabor College Inc trading as Tabor Adelaide	(zf) Edith Cowan College Pty Ltd
(f) Eastern College Australia Inc	(zg) Educational Enterprises Australia Pty Ltd
(g) Christian Heritage College	(zh) ICHM Pty Ltd
(h) Holmesglen Institute trading as Holmesglen Institute of TAFE	(zi) INSEARCH Limited
(i) Melbourne Polytechnic	(zj) International College of Management, Sydney Pty. Limited
(j) Academy of Information Technology Pty Ltd	(zk) JMC Pty. Limited
(k) Australian College of Nursing Ltd	(zl) Kaplan Higher Education Pty Ltd
(l) Alphacrucis University College Limited	(zm) Kaplan Business School Pty Limited
(m) Higher Education Leadership Institute Pty Ltd	(zn) Kent Institute Australia Pty Ltd
(n) Chisholm Institute	(zo) Le Cordon Bleu Australia Pty Limited
(o) The Cairnmillar Institute	(zp) Morling College Ltd
(p) Box Hill Institute	(zq) Navitas Professional Institute Pty Ltd
(q) Australian College of Natural Medicine Pty Ltd trading as Endeavour College of Natural Health	(zr) Queensland Institute of Business & Technology Pty Ltd

(r) Engineering Institute of Technology Pty Ltd	(zs) South Australian Institute of Business and Technology Pty Ltd
(s) Excelsia University College	(zt) Southern Cross Education Institute (Higher Education) Pty Ltd
(t) Health Education and Training Institute	(zu) S P Jain School of Global Management Pty Limited
(u) Navitas Bundoora Pty Ltd	(zv) Sydney Institute of Business and Technology Pty Ltd
(v) Marcus Oldham College	(zw) Think: Colleges Pty Ltd
(w) Melbourne Institute of Business and Technology Pty Ltd	(zx) Top Education Group Limited
(x) Melbourne Institute of Technology Pty Ltd	(zy) Wentworth Institute of Higher Education Pty Ltd
(y) SAE Institute Pty Limited	(zz) Whitehouse Institute Pty Ltd
(z) Technical and Further Education Commission	(zza) The National Institute of Dramatic Art
(za) TAFE Queensland	

Draft Commonwealth Grant Scheme Guidelines 2026 — 18 providers (section 7)

(a) Alphacrucis University College Limited trading as Alphacrucis College	(j) Holmesglen Institute
(b) Australian University of Theology Limited trading as Australian University of Theology	(k) Melbourne Polytechnic
(c) Avondale University College Limited trading as Avondale University	(l) Tabor College Inc trading as Tabor Adelaide
(d) Bond University Limited	(m) TAFE Queensland
(e) Box Hill Institute	(n) TAFE SA
(f) Chisholm Institute	(o) Technical and Further Education Commission trading as TAFE NSW Higher Education
(g) Christian Heritage College	(p) The National Institute of Dramatic Art
(h) Eastern College Australia Limited	(q) Torrens University Australia Ltd trading as Torrens University Australia
(i) Excelsia University College	(r) University of Divinity

Note: *The reference to Alphacrucis in section 7(a) of the draft Higher Education Support (Commonwealth Grant Scheme) Guidelines 2026 should be amended from "Alphacrucis University College Limited trading as Alphacrucis College" to "Alphacrucis University College Limited trading as Alphacrucis University College". The latter reflects the institution's current trading name. Any corresponding references in the accompanying Explanatory Statement should also be updated.*

Make course eligibility clear (section 8)

Draft section 8 specifies priority classes of courses using Field of Education codes, rather than the broader descriptions used for some national priorities in the 2020 Guidelines. For example, the general list includes mechanical engineering but not civil or electrical engineering, and nursing and public health but not several allied health disciplines. IHEA recognises that some earlier priorities were time–limited and that differences in classification do not necessarily mean existing funded places will be lost.

The Explanatory Statement describes the new priority classes but does not explain the reasons for excluding particular disciplines or assess the effects on currently funded courses. DoE should identify whether any existing funded courses or continuing students will be affected, explain the reasons for material changes, and include that

explanation in the final Explanatory Statement. This matters to independent providers seeking to maintain or expand courses in areas of demonstrated workforce demand.

Adding an eligible priority class and changing an existing allocation are separate decisions. While ATEC can allocate places only for priority classes specified in the Guidelines, it cannot add a new class through an individual allocation decision. IHEA therefore seeks a clear process for providers to ask the Minister to consider amending the Guidelines to include additional priority classes, informed by student demand and workforce need.

Protect students already studying (sections 6 and 8)

Existing legislation protects eligible continuing Commonwealth–supported students. Under section 36–25 of HESA, a provider generally must continue treating a qualifying student as Commonwealth supported in subsequent units of the same course at that provider, subject to statutory conditions. ATEC must consider the effect of an allocation on the provider's ability to meet that obligation (section 30–45).

IHEA seeks confirmation of how continuing students will be accommodated within the new funding arrangements from 2027, particularly where courses are being taught out or their classifications change. This will help ensure providers can meet their statutory obligations without disruption to students. Draft subsection 8(3) separately identifies certain Commerce, Computing and Engineering courses for continuing Commonwealth–supported students who commenced in 2023, 2024 or 2025. DoE should clarify the treatment of eligible students who commenced comparable Commonwealth–supported courses in 2026, including how their continuing–study obligations will be accommodated in 2027.

Make course–specific allocations workable

For non–Table A providers, ATEC allocates Commonwealth–supported places by priority class of course. A provider may have unused places in one class while demand exceeds its allocation in another. This makes a timely process for seeking adjustments important, particularly for smaller and specialist independent providers.

IHEA recommends that ATEC publish the process, criteria and decision timeframes for requests to adjust allocations during the year, including transfers between priority classes where permitted by legislation. This would help providers respond to changing student demand and minimise unused capacity.

Explain student data checks and payments (sections 8, 9 and 15)

Draft section 8 refers to courses reported in verified student data for the relevant year, but providers must make offers before that data is finalised. IHEA seeks guidance on how course eligibility will be established in advance and how subsequent verification will affect grant payments, including which course classification is used.

Where genuine classification or reporting errors arise, providers should have clear correction deadlines and an opportunity to resolve discrepancies, with the financial consequences explained before any reduction or recovery. Requests for forecasts under section 15 are legitimate but should use consistent definitions and allow reasonable response times.

Keep funding conditions proportionate (sections 13–15)

Section 13 largely reflects existing policy and the Higher Education Standards Framework (Threshold Standards) 2021. Any substantive changes to admissions conditions following consideration by Education Ministers should be separately consulted on with independent providers and avoid duplicating TEQSA's existing oversight.

Section 14(1) refers to Commonwealth–supported students, whereas sections 14(2) and 14(3) refer to "every person enrolled" in relevant courses. IHEA seeks clarification of whether these CGS funding conditions are intended to extend to full–fee–paying students. If the conditions are intended to apply only to Commonwealth–supported students, sections 14(2) and 14(3) should be amended accordingly. If broader coverage is intended, the Explanatory Statement should explain its rationale and interaction with existing professional accreditation requirements.

Broader implications for independent higher education

IHEA continues to advocate for fairer access to Commonwealth–supported places and needs–based funding for capable independent higher education providers. Under section 39–10 of HESA as amended, a needs–based grant is payable only where a CGS grant is payable to the provider for the same year. Restrictions on CGS eligibility can therefore also affect access to needs–based funding for eligible students at independent providers. IHEA considers that public support should reflect student need, demand, educational outcomes and workforce priorities, rather than provider category alone. While some eligibility distinctions arise under the Act rather than these Guidelines, their effects on student choice and educational equity should be monitored.

Implementation and conclusion

IHEA requests that DoE and ATEC publish concise implementation guidance explaining how eligible continuing students will be accommodated, how providers can seek adjustments to allocations, and how verified student data will be used to reconcile grant payments. The guidance should identify responsible decision–makers, criteria, timeframes, correction processes and contact points. A targeted review with affected providers during 2027 would help identify and resolve unintended problems promptly.

The priority in finalising the Guidelines should be to make existing policy workable under the new system, give providers certainty and protect students against unintended disruption, while preserving opportunities for independent higher education to contribute to national skills and equity objectives.

Who We Are

Independent Higher Education Australia Ltd. (IHEA) is a peak body established in 2001to 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 Australian Qualifications Framework (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

IHEA INDEPENDENT HIGHER EDUCATION AUSTRALIA

NineSquared

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