



COVID-19 Response —

Backing Independent
Tertiary Education Providers

Immediate action to be taken by government to support independent higher education, vocational education, training and skills providers



COVID-19 Response — Backing Independent Tertiary Education Providers

Australia's independent tertiary education sector is vital to our economy. It provides the specialist skills and expertise needed by business of all sizes. Importantly, as government sets about the task of economic recovery and the need to retrain jobseekers, the heavy lifting will be done by independent providers in the higher education, vocational education, training and skills sectors.

Today, the sustainability of the independent tertiary education sector is at risk due to the response to the Covid-19 virus outbreak.

The closure of borders and introduction of social distancing measures, sensible approaches to prevent the spread of the Covid-19 virus, have made it impossible to deliver higher education, vocational education, training and skills in the same way. Although the move towards online delivery and assessment provides a pathway for some to either resume or take-up study, the reality is that this is not always possible.

The simple reality is that without measures such as cutting red-tape and providing immediate financial relief from government fees and charges, the sustainability of Australia's independent tertiary education sector cannot be guaranteed.

Without government intervention, the capacity of Australia's independent tertiary education system is being reduced just when our community and economy need it most. In an environment where unemployment is likely to exceed ten percent, and government will invest in education and skills delivery to support the transition of unemployed people back to work, it is imperative that the government steps-up to support Australia's independent tertiary education system.

Independent tertiary providers support more students than the public TAFE colleges and public universities combined. Independent providers in the vocational education sector support around 80% of the 4.1 million students in vocational education and independent higher education providers support around 10% of the 1.5 million students in higher education.

The measures set out here by the Independent Tertiary Education Council Australia (ITECA) are focussed on relieving the immediate and medium-term pressures faced by independent tertiary education providers. These measures cut red-tape in the short-term by reducing the burden associated with routine compliance and audit activity. The measures improve cashflow for independent providers just when they need it most.

More than ever, Australia needs a strong independent tertiary education sector with a track-record of offering students and their employers the quality outcomes they are looking for. This is what makes the immediate delivery of the assistance measures set out in this document so vital.

Troy R Williams FIML MIACD
ITECA Chief Executive

Schedule Of Measures

Supporting Independent Tertiary Education Providers

Higher Education Sector —

- Support Measure 1 TEQSA Full Cost Recovery Delay
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Support Measure 1 – TEQSA Full Cost Recovery Delay

The higher education sector's regulator, the Tertiary Education Quality and Standards Agency (TEQSA) currently operates on a partial cost recovery model. The current policy position of the Australian Government is that TEQSA should move towards full cost recovery on 1 July 2020.

Support Measure –

That the move of TEQSA towards full-cost recovery be delayed until 1 July 2021 thought be given to temporarily setting aside all fees paid in 2020.

As TEQSA has not yet released for public review a detailed activity-based costing exercise as part of a broader review of its cost recovery arrangements, it is not possible to articulate the benefit that adoption of this recommendation would provide the independent higher education sector.

As a further support measure, ITECA also recommends that government set aside all TEQSA fees and charges for 2020, possibly including a reimbursement for those fees already paid.

Australian Government budget papers suggest that the delaying the introduction of fully-cost recover would provide a saving to higher education providers (both public and independent) of around \$8.7 million in FY2020-21; however, given the considerable financial resources of public universities and the public TAFE sector it is arguably not appropriate to extend this measure to these institutions thus the cost to the Australian Government will be reduced.

Sector –

- Higher Education

Department / Agency –

- Tertiary Education Quality & Standards Agency
- Department of Education, Skills & Employment

Benefit –

- A delay of the new fees and charges will allow providers to retain cash which works towards underpinning the sustainability of providers thus preserving jobs in the sector.

Support Measure 2 – Suspending Reporting & Compliance Activity

Independent higher education providers face a considerable red-tape burden associated with routine reporting and compliance activity. This ranges from reporting of student numbers and completion rates to an assessment associated with meeting the *Higher Education Standards Framework 2015* enforced by the Tertiary Education Quality and Standards Agency (TEQSA).

Support Measure –

That all routine reporting and compliance activity be suspended until 30 June 2020 and, at that stage, a review be undertaken to ascertain whether a further three-month extension is warranted.

To provide a degree of confidence that higher education providers are meeting their obligations to students, they are required to submit a number of routine reports and undergo regular scheduled audit activity. Similarly, the Department requires routine reporting when the higher education provider supports students that access the FEE-HELP loan program.

ITECA members are asking that all routine reporting and compliance activity be suspended until 30 June 2020. This measure is essential to ensure providers are afforded some 'clear air' to manage their business operations in what are unprecedented times. This suspension should be reviewed with the option of extending it by another three months if circumstances merit.

The measure would also minimise face-to-face contact between staff at providers and regulators, thus working to help minimise the spread of the Covid-19 virus. It is acknowledged that, where possible, routine compliance activity has been transitioned to online and desk-based activity which certainly helps to reduce the transmission of the virus; however, in many circumstances this does not in any material way diminish the workload experienced by providers.

The exception to this suspension would be reporting and compliance activity associated with 'high risk' providers or if circumstances have been identified that merit a review. Similarly, reporting associated with provision and acquittal of funding should be maintained for all providers.

ITECA appreciates the substantial effort over the past two years to reduce the red-tape associated with this reporting and compliance activity. This has greatly assisted the independent higher education sector; however, the obligations that remain divert Australia's independent higher education sector from the important task of supporting their students and staff.

Sector –

- Higher Education

Department / Agency –

- Tertiary Education Quality & Standards Agency
- Department of Education, Skills & Employment

Benefit –

- This measure would reduce the short-term compliance burden, allowing providers to focus on supporting students and their staff.
- The measure would also minimise face-to-face contact between staff at providers and regulators, thus working to help minimise the spread of the Covid-19 virus.

Support Measure 3 – FEE-HELP Loan Fee Suspension

When a student studies at an eligible independent higher education provider they can may be able to access a FEE-HELP loan from the Australian Government to pay all or part of their tuition fees. The challenge is, in most cases students have to pay a 'loan fee' of 25% over and above their loan solely because they studied at an independent higher education provider.

Support Measure –

That the higher education loan fee be removed for all students enrolling in courses and units through to 30 June 2021 and any reinstatement be dependent on an independent review of its efficacy as a policy response and a determination of its level.

The practical outcome is that a student accessing a \$40,000 student loan will owe the Australian Government \$50,000 on completion. Removing the loan fee removes a disincentive for Australians wanting to take-up study with an independent higher education provider during the economic crisis.

Removal of the loan fee also has the potential to encourage a greater number of Australians to enrol with an independent higher education provider, thus help the viability of these providers.

There are legitimate questions concerning the validity of the FEE-HELP loan fee as a policy tool given the inability of the Australian Government to measure its efficacy as a policy response to an ill-defined problem. Furthermore, it can be reasonably argued that the FEE-HELP loan fee creates an artificial and unnecessary barrier to a student's ability to select the higher education provider of their choice – effectively the fee creates an inequity when one provider is compared to another.

The FEE-HELP loan fee does not apply to students studying at Bond University, the University of Notre Dame Australia, Torrens University or the University of Divinity. It also does not apply to postgraduate study (including higher degrees by research) or an enabling course, or to students enrolled in units of study through Open Universities Australia.

The suspension and review of the FEE-HELP loan fee should be undertaken simultaneously with the review of the VET Student Loan fee of 20%.

Sector –

- Higher Education

Department / Agency –

- Department of Education, Skills & Employment

Benefit –

- This measure would encourage a greater number of Australians to take-up study as opposed to being unemployed during the economic crisis.
- The increased student intake will support the sustainability of independent higher education providers.

Support Measure 4 – FEE-HELP Payment Acceleration

Students studying with eligible independent higher education providers have the ability to access FEE-HELP funding to assist them pay for their studies. When students elect to access this option, the funds are paid directly by the Australian Government to the independent higher education provider. These payments to providers can sometimes take several weeks to process and for payments to be remitted to providers.

Support Measure –

That independent higher education providers that support students accessing FEE-HELP loans receive funding within twenty days when evidence that payment should be made has been rendered to the Department.

To ensure that independent higher education providers can operate sustainably in these challenging times, it's time to expedite payments to providers that support students with FEE-HELP access.

In November 2018 the Prime Minister committed the Australian Government to paying invoices under \$1 million within twenty days by 1 July 2020. The recommendation of ITECA members is that this principle should apply to all payments to higher education providers eligible to receive payments for supporting students accessing FEE-HELP loans.

Sector –

- Higher Education

Department / Agency –

- Department of Education, Skills & Employment

Benefit –

- This measure would increase cash-flow within independent higher education providers therefore underpinning the sustainability of providers thus preserving jobs in the sector.

Support Measure 5 – FEE-HELP Student Loan Cap Flexibility

Students studying with eligible independent higher education providers have the ability to access FEE-HELP funding to assist them pay for their studies. All students who access the Government's Higher Education Loan Program have a loan cap.

Support Measure –

In cases where students cannot fully engage with the higher education provider due to Covid-19 related measures and have failed that unit, a student's FEE-HELP loan liability for the unit they have failed should not count towards their overall HELP loan cap, thereby ensuring the student retains greater capacity within the loan cap to complete their studies.

In 2020 the loan cap is \$106,319; however, it is higher for those doing medicine, dentistry or veterinary science. It is important to note that the funds are paid directly by the Australian Government to the independent higher education provider.

The current Covid-19 environment makes it challenging for both providers to deliver the quality higher education that ITECA members are known for, and for their students to fully engage in new modes of delivery.

Sector –

- Higher Education

Department / Agency –

- Department of Education, Skills & Employment

Benefit –

- This would enable a student to re-sit a unit they may have failed due to support a provider had been unable to provide due to no fault of their own without financial penalty.

Support Measure 6 – Delaying Qualifications Renewal Applications

Independent higher education providers without self-accrediting authority must apply to the Tertiary Education Quality and Standards Agency (TEQSA) in writing to renew the accreditation of a higher education course of study.

Support Measure –

Where the accreditation of a higher education course of study expires before 31 December 2020, TEQSA automatically extend the accreditation of that course of study by twelve months.

To provide a higher education course of study, providers without self-accrediting authority must have a course accredited by TEQSA under the *Tertiary Education Quality and Standards Agency Act 2011 (TEQSA Act)*. Only eligible, registered higher education providers can apply for accreditation of higher education courses and the subsequent renewal of the same.

Applications must be made and delivered via on the approved online application form (available from the Provider Portal), include all information requested, and be accompanied by the applicable fee and payment/invoice form. The renewal accreditation is a time-consuming activity for the staff within independent higher education providers.

The extension of higher education course accreditation, where this is due to expire before 31 December 2020, will reduce the compliance burden on independent higher education providers. This makes available the human resources that can be more appropriately focussed on supporting students and the staff within higher education providers.

Sector –

- Higher Education

Department / Agency –

- Tertiary Education Quality & Standards Agency

Benefit –

- This measure frees-up human resources that can be more appropriately focussed on supporting students and on the staff within higher education providers.

Support Measure 7 – Delaying Provider Reregistration Applications

Registered higher education providers must apply to the Tertiary Education Quality and Standards Agency (TEQSA) in writing to renew their registration. This activity is a time-intensive activity requiring a full self-appraisal of a provider's activity and a submission of a highly detailed report to TEQSA.

Support Measure –

All independent higher education providers with a registration due to expire before 30 June 2021 will have their registration extended by between twelve and twenty-four months.

A higher education provider must submit a registration renewal at least one hundred and eighty days before registration is due to expire, unless a shorter time frame has been agreed to. It's in this context, being cognisant of the considerable compliance activity associated with registration renewal, that ITECA members request a twenty-four month extension of renewals.

It would be open for TEQSA to extend registration for between twelve and twenty-four months based on the provider's risk profile as established through TEQSA's risk matrix.

The extension of higher education registration (i.e. delaying the renewal process), where this is due to expire before 30 June 2021, will reduce the compliance burden on independent higher education providers. This makes available the human resources that can be more appropriately focussed on supporting students and on the staff within higher education providers.

Given the considerable resources of public universities which allows those institutions to utilise considerable human resources in focussing on compliance activity, it is arguably not appropriate to extend this measure to that sector.

Sector –

- Higher Education

Department / Agency –

- Tertiary Education Quality & Standards Agency

Benefit –

- This measure frees-up human resources that can be more appropriately focussed on supporting students and on the staff within higher education providers.

Support Measure 8 – ASQA Full Cost Recovery Delay

The vocational education and training sector's regulator, the Australian Skills Quality Authority (ASQA) currently operates on a partial cost recovery model. The current policy position of the Australian Government is that ASQA should move towards full cost recovery on 1 July 2020.

Support Measure –

That the move of ASQA towards full cost recovery be delayed until 1 July 2021 and thought be given to temporarily setting aside all fees paid in 2020.

The 2018 Australian Government Budget announced that ASQA will transition from partial cost recovery to full cost recovery by FY2020–21 and 1 July 2020 remains the implementation date.

The imposition of the fees and charges that will come with ASQA's planned move to full-cost recovery will severely impact upon the cash-flow and sustainability of Registered Training Organisations (RTOs).

Delaying the introduction of the move towards full-cost recovery will allow these RTOs to preserve their workforce and keep their doors open, thus supporting students in these troubled times.

As a further support measure, ITECA also recommends that government set aside all ASQA fees and charges for 2020, possibly including a reimbursement for those fees already paid.

Australian Government budget papers suggest that delaying the introduction of full cost-recovery would provide a saving to RTOs (both public and independent) of around \$20.9 million in FY2020-21; however, given the considerable financial resources of public universities and the public TAFE sector it is arguably not appropriate to extend this measure to these institutions thus the cost to the Australian Government will be reduced.

Sector –

- Vocational Education & Training

Department / Agency –

- Australian Skills Quality Authority

Benefit –

- A delay of the new fees and charges will allow RTOs to retain cash which works towards underpinning the sustainability of providers thus preserving jobs in the sector.

Support Measure 9 – Suspending Reporting & Compliance Activity

Independent Registered Training Organisations (RTOs) face a considerable red-tape burden associated with routine reporting and compliance activity. This ranges from reporting of student numbers and completion rates to an assessment associated with meeting the Standards for Registered Training Organisations 2015 enforced by the Australian Skills Qualifications Authority (ASQA) and state regulators in Victoria and Western Australia.

Support Measure –

That all routine reporting and compliance activity be suspended until 30 June 2020 and, at that stage, a review be undertaken to ascertain whether a further three-month extension is warranted.

To provide a degree of confidence that RTOs are meeting their obligations to students, they are required to submit a number of routine reports and undergo regular scheduled audit activity. Similarly, the Department requires routine reporting when the higher education provider supports students that access the VSL loan program.

As independent RTOs are busy supporting students and their staff deal with the response to the Covid-19 virus outbreak, now is not the time to burden the sector with routine reporting and compliance activity.

The measure would also minimise face-to-face contact between staff at providers and regulators, thus working to help minimise the spread of the Covid-19 virus. It is acknowledged that, where possible, routine compliance activity has been transitioned to online and desk-based activity which certainly helps to reduce the transmission of the virus; however, in many circumstances this actually adds to the workload that providers have.

The exception to this suspension would be reporting and compliance activity associated with 'high risk' providers or if circumstances have been identified that merit a review. Similarly, reporting associated with provision and acquittal of funding should be maintained for all providers.

Given the considerable resources of the public TAFE sector which allows them to utilise considerable human resources to focus on compliance activity, it is arguably not appropriate to extend this measure to that sector.

Sector –

- Vocational Education & Training

Department / Agency –

- Australian Skills Quality Authority
- Department of Education, Skills & Employment
- Victorian Registration & Qualifications Authority
- Training Accreditation Council Western Australia

Benefit –

- This measure would reduce the short-term compliance burden, allowing providers to focus on supporting students and their staff.
- The measure would also minimise face-to-face contact between staff at providers and regulators, thus working to help minimise the spread of the Covid-19 virus.

Support Measure 10 – Delaying Provider Reregistration Applications

Independent Registered Training Organisations (RTOs) must apply to the Australian Skills Quality Authority (ASQA), plus regulators in Victoria and Western Australia, to renew their registration. This activity is a time-intensive compliance activity requiring a full self-appraisal of a provider's activity and a submission of a highly detailed report to ASQA.

Support Measure –

All RTOs with a registration due to expire before 30 June 2021 will have their registration extended by twelve months.

An independent RTO must submit a registration renewal at least ninety days before registration is due to expire, unless a shorter time frame has been agreed to. It's in this context, being cognisant of the considerable compliance activity associated with registration renewal, that ITECA members request a twelve-month extension of renewals.

The extension of independent RTO registration (i.e. delaying the renewal process), where this is due to expire before 30 June 2021, will reduce the compliance burden on independent higher education providers. This makes available the human resources that can be more appropriately focussed on supporting students and the staff within higher education providers.

Given the considerable resources of the public TAFE sector which allow those entities to utilise their considerable human resources to focus on compliance activity, it is arguably not appropriate to extend this measure to that sector.

Sector –

- Vocational Education & Training

Department / Agency –

- Australian Skills Quality Authority
- Victorian Registration & Qualifications Authority
- Training Accreditation Council Western Australia

Benefit –

- This measure frees-up human resources that can be more appropriately focussed on supporting students and on the staff within higher education providers.

Support Measure 11 – Placing Registration Into Abeyance

As the impact of the response to the Covid-19 virus outbreak significantly curtails student demand for courses, many independent Registered Training Organisations (RTOs) face a real and present threat to their sustainability. Many will elect to close their doors; however, the current regulatory arrangements for RTOs do not allow them to do this temporarily.

Support Measure –

That RTOs be permitted to place their registration 'in abeyance' for a period of twelve months (free from charges and compliance activity) with the option of a twelve-month extension if circumstances warrant.

The Australian Skills Quality Authority (ASQA), and its counterparts in Victoria and Western Australia, should be able to create a new RTO registration category of 'In Abeyance' where a manager / proprietor of an RTO wishes to cease teaching and assessment activities, essentially 'mothballing' the organisation.

During this period the RTO would be free from audit and reporting activities, beyond the need to provide a report every six months verifying the RTO is not undertaking paid enrolments, teaching or assessment activities.

A protocol will be necessary for when an RTO seeks to recommence activities, so that it may seek enrolments (without payment) in order to test the market; however, it should not seek nor accept payment from students without reinstating the RTOs full registration status.

This measure will allow the vocational education and training system to retain capacity so that when the economic recovery gets underway the ability exists to the provider to recommence training operations.

Sector –

- Vocational Education & Training

Department / Agency –

- Australian Skills Quality Authority
- Victorian Registration & Qualifications Authority
- Training Accreditation Council Western Australia

Benefit –

- This measure frees-up human resources that can be more appropriately focussed on supporting students and on the staff within vocational education and training providers.

Support Measure 12 – VET Student Loan Payment Acceleration

Students with independent Registered Training Organisations (RTOs) have the ability to access VET Student Loans funding to pay for their studies. When students elect to access this option, the funds are paid directly by the Australian Government to the independent RTOs. These payments to providers can sometimes take around sixty days to process and for payments to be remitted to providers.

Support Measure –

That independent RTOs that support students accessing VET Student Loans receive funding within ten working days when evidence that payment should be made has been rendered to the Department.

To ensure that independent RTOs can operate sustainably in these challenging times, it's time to expedite payments to providers that support students with VET Student Loans access.

In November 2018 the Prime Minister committed the Australian Government to paying invoices under \$1 million within twenty days by 1 July 2020. The recommendation of ITECA members is that this principle should apply to all payments to independent RTOs eligible to receive payments for supporting students accessing VET Student Loans.

Sector –

- Vocational Education & Training

Department / Agency –

- Department of Education, Skills & Employment

Benefit –

- This measure would increase cash-flow within independent RTOs therefore underpinning the sustainability of providers thus preserving jobs in the sector.

Support Measure 13 – VET Student Loan Program Expansion

The VET Student Loans program assists eligible students pay tuition fees for approved higher-level (diploma and above) vocational education and training courses, when studying at VET Student Loans approved course providers. As the response to the Covid-19 outbreak creates a greater number of unemployed, an expansion of the VET Student Loans program will create opportunities to place them into VET courses.

Support Measure –

That the number of courses for which students can access a VET Student Loan program be expanded, along with the number of providers able to offer VET Student Loans to support their students.

The first component of this measure will be to expand the number of courses for which loans can be provided beyond higher-level (diploma and above) courses to Certificate IV and Certificate III programs.

The second component will be an immediate expansion of the number of independent RTOs that are able to access the VET Student Loans program to support students. The existing criteria that validates the integrity of an independent RTO to offer VET Student Loans to students should be retained.

Sector –

- Vocational Education & Training

Department / Agency –

- Department of Education, Skills & Employment

Benefit –

- This measure would increase the number of students in a vocational education and training program.
- The increased student intake will support the sustainability of independent RTOs.

Support Measure 14 – VET Student Loan Fee Suspension

When a student studies at an independent Registered Training Organisation (RTO) that has been approved by the Australian Government, they may be able to access a VET Student Loan to pay for all or part of their tuition fees. The challenge is, in most cases students have to pay a 'loan fee' of 20% over and above their loan solely because they study at an independent higher education provider.

Support Measure –

That the VET Student Loan fee be removed until 30 June 2021 and any reinstatement be dependent on an independent review of its efficacy as a policy response and a determination of its level.

The practical outcome is that a student accessing a \$20,000 student loan end-up owing the Australian Government \$24,000. Removing the loan fee removes a disincentive for Australians wanting to take-up study with an independent RTO during the economic crisis.

Removal of the loan fee also has the potential to encourage a greater number of Australians to enrol with an independent RTO, thus helping the viability of these providers.

There are legitimate questions concerning the validity of the VET Student loan fee as a policy tool given the inability of the Australian Government to measure its efficacy as a policy response to an ill-defined problem. Furthermore, it can be reasonably argued that the VET Student loan fee creates an artificial and unnecessary barrier to a student's ability to select the provider of their choice – effectively the fee creates an artificial inequity when one provider is compared to another.

The suspension and review of the VET Student Loan fee should be undertaken simultaneously with the review of the 25% loan fee associated with the FEE-HELP loans in the higher education sector.

Sector –

- Vocational Education & Training

Department / Agency –

- Department of Education, Skills & Employment

Benefit –

- This measure would encourage a greater number of Australians to take-up study as opposed to being unemployed during the economic crisis.
- The increased student intake will support the sustainability of independent RTOs.

Support Measure 15 – VET Program Work Placement

Work placement is a planned opportunity in a quality host workplace that enables vocational education and training students studying particular industry-based courses to practise and develop their industry competencies and their employability skills in a relevant real-work context. With the closure of many workplaces and the introduction of measures to prevent the spread of the Covid-19 virus, students are no longer able to fulfil their work placement requirement.

Support Measure –

That the requirements within training packages for students to undertake work placements be set aside for the purposes of partial qualification attainment and provision of funding to providers.

There are two aspects to this issue. The first is that students are unable to complete their qualifications as they cannot meet the work placement requirement. This leads to the second aspect, this being that independent Registered Training Organisations (RTOs) are not being paid as the student has not met the requirements for the qualification to be awarded. Both are outcomes beyond the scope of students and independent RTOs to address.

ITECA advises, in the strongest possible terms, that the Australian Government work with Skills Service Organisations (SSOs), the bodies responsible for qualifications development, and the Australian Industry Skills Council to temporarily set aside the work placement requirement so that students can be awarded a partial qualification.

ITECA also advises that state / territory government funding bodies should revise funding arrangements so that independent RTOs can be awarded all of the funding (including that associated with course completion) less a component associated with management and recognition of the work placement component.

Sector –

- Vocational Education & Training

Department / Agency –

- Australian Skills Quality Authority
- Skills Service Organisations
- State & Territory Funding Bodies

Benefit –

- This measure would allow students to obtain a partial qualification.
- Revision of funding arrangements will provide important cash-flow for independent RTOs, therefore underpinning the sustainability of providers thus preserving jobs in the sector.

Support Measure 16 – Improved Access To Public Facilities

One of the largest financial costs that independent Registered Training Organisations (RTOs) have is the provision of suitable facilities for the provision of training and assessment. To support independent RTOs, there are advantages to the community in allowing such providers to access under-utilised facilities in the nation's public TAFE colleges.

Support Measure –

Where public TAFE infrastructure is unused, it be made available to independent RTOs at nominal rates.

The investment in this infrastructure has already been made by the taxpayer and, in that context, it is both sensible and necessary that it be put to best use when underutilised. In this context, making these facilities available to independent RTOs represents a logical alignment between community needs and the sector's capacity to work together.

This initiative will be particularly important as Australia turns to the economic recovery phase where independent RTOs, and public TAFE colleges, need to work together to provide the education and training to individuals looking to render the workforce during the economic recovery phase.

This measure will support the sustainability of independent RTOs through reduced infrastructure costs.

This initiative agreement broadly mirrors the agreement between ITECA and TAFE South Australia.

Sector –

- Vocational Education & Training

Department / Agency –

- State & Territory Governments

Benefit –

- This measure will support the sustainability of independent RTOs through reduced infrastructure costs.

Support Measure 17 – CRICOS Fees & Charge Relief

Both higher education providers and those in the vocational education and training sector must pay fees to be placed on the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS). At a time where the international education sector is facing extraordinary difficulty, this fee contributes to the financial hardship that providers are facing.

Support Measure –

That independent tertiary education providers be relieved of CRICOS charging arrangements until 30 June 2021, with the exception of Entry to Market Charges, and that their reintroduction be considered at that point in time, with a view to further extending the relief if circumstances warrant continuation of this support.

Providers registered to deliver both CRICOS and vocational education and training courses must pay both types of annual registration charge: the CRICOS annual registration charge and the RTO annual registration charge. The CRICOS annual registration charge has four components (indexed annually) and includes a charge per course on a provider's scope of registration (at each location were registered to be delivered). This is:

- \$1505 base fee; plus
- \$10 per student enrolment per calendar year; plus
- \$115 for each course by location registered on CRICOS; plus
- \$1156 payable only by a provider against whom the Minister has imposed sanctions for non-compliance in certain circumstances.

This charge is for those providers delivering to overseas students and is separate to the yearly registration charge imposed by ASQA. The registration charges imposed by ASQA are calculated based on the number of qualifications on a provider's scope of registration:

- 0 to 2 qualifications — \$950
- 3 to 4 qualifications — \$1645
- 5 to 50 qualifications — \$4375
- 51 or more qualifications — \$7100.

Setting aside these charges temporarily would provide greatly needed assistance to the independent tertiary education sector which faces a threat to its sustainability with the closure of trans-national borders.

Given the considerable financial resources of public universities and the public TAFE sector it is arguably not appropriate to extend this measure to these institutions.

Sector –

- International Education

Department / Agency –

- Australian Skills Quality Authority
- Department of Education, Skills & Employment

Benefit –

- This measure would increase cash-flow within independent international education providers therefore underpinning the sustainability of providers thus preserving jobs in the sector.

Support Measure 18 – TPS Levy Relief

The Tuition Protection Service (TPS) is an initiative of the Australian Government to assist international students and certain domestic students whose education providers are unable to fully deliver their course of study. It is funded by a levy on international education providers.

Support Measure –

That independent tertiary education providers be relieved of the 2020 TPS Levy (that is not required to pay an amount until 30 June 2021) and that their reintroduction be considered at that point in time, with a view to further extending the relief if circumstances warrant continuation of this support.

The TPS is funded by a levy made up of three components: an administrative fee component; a risk rated premium component and a tuition protection component. The administrative fee component will be as determined in a legislative instrument made by the Minister for Education. The risk rated premium component and tuition protection component will be calculated using inputs determined in a legislative instrument made by the TPS Director, with prior approval by the Treasurer.

Given the considerable financial resources of public universities and the public TAFE sector, and noting they only pay a small component of the Levy, it is arguably not appropriate to extend this measure to these institutions.

Sector –

- International Education

Department / Agency –

- Tuition Protection Service
- Department of Education, Skills & Employment

Benefit –

- This measure would increase cash-flow within independent international education providers therefore underpinning the sustainability of providers thus preserving jobs in the sector.

Support Measure 19 – Suspension Of Delivery Rules

As part of the arrangements that support international students, visa approvals include a condition that the student study a full-time course. With the current health restrictions associated with social distancing, many international education providers are unable to meet this full-time study requirement.

Support Measure –

Full time course rules should be suspended until 30 June 2021 to provide necessary flexibility for students and providers. Student attendance requirements should be suspended until 30 June 2021 while course progress requirements maintained.

This is a practical step that can be taken due to the fact that independent higher education and vocational education and training providers are unable, in many cases, to offer the education and training to students that was initially envisaged thus making it difficult for the latter to meet their full-time study commitment.

Sector –

- International Education

Department / Agency –

- Department of Home Affairs
- Department of Education, Skills & Employment

Benefit –

- This measure addresses a compliance issues where students are unable to meet their VISA-related study obligations through no fault of their own.

Support Measure 20 – Online Training & Assistance Delivery

As part of the arrangements that support international students, visa approvals include a condition that the student study a full-time course. With the current health restrictions associated with social distancing, many international education providers are unable to meet this requirement.

Support Measure –

That grants of up to \$25,000 be provided to allow five hundred independent tertiary education providers transition to online training and assessment.

Eligibility for grant funding would be based upon criteria developed by ITECA in concert with the Department of Education, Skills and Employment. It would be available to independent tertiary education providers with no, or minimal, experience in online education, training and assessment.

The total grant amount would include a capital grant of \$22,500 (GST Excluded) up to five hundred provides to purchase and commission equipment to facilitate online learning. Payments would be made by the Independent Tertiary Education Council Australia (ITECA) directly to IT equipment suppliers (rather than providers themselves).

Providers accessing the program would secure technical guidance and mentoring about delivering online assessment and training in a program delivered by ITECA.

The program would be managed by ITECA in accordance with funding criteria developed jointly with the Department of Education, Skills and Employment.

The cost of this initiative is a maximum of \$13.1 million based upon the take-up by five hundred providers (capped) at the maximum grant amount and an administrative overhead.

Sector –

- Higher Education
- Vocational Education & Training
- International Education

Department / Agency –

- Department of Education, Skills & Employment

Benefit –

- This measure provides support for those independent tertiary education providers that need to transition their education, training and assessment to an online format.

Support Measure 21 – Securing The Capability Of The Sector

Australia needs a robust independent tertiary education sector to support workers gain the skills needed to be productive and to ensure that those looking to re-enter the workforce can do so. In the current environment where student numbers are declining, it is necessary to provide additional support to independent higher education providers and Registered Training Organisations (RTOs).

Support Measure –

That grants of up to \$125,000 be provided to eligible independent tertiary education providers to 30 June 2021.

This measure ensures that the independent tertiary education sector will have the capacity to support the education and training of the workforce as the economic recovery gets underway.

Independent tertiary education providers with an aggregated annual turnover of under \$50 million will be eligible to receive two payments equal to 100 per cent of their PAYG withheld on salary and wages, for a total maximum payment of \$125,000. The first payment (capped at \$50,000) will be made after 28 April 2020 and the second payment (capped at \$75,000) after 28 July 2020.

The payments will be made in addition to existing Australian Government support measures for businesses with an annual turn-over of \$50 million or less.

Independent higher education and independent Registered Training Organisations (RTOs) will be eligible for the support. It is estimated that this will support around 3,600 independent higher education providers and RTOs at a cost of around \$180 million.

Sector –

- Higher Education
- Vocational Education & Training
- International Education

Department / Agency –

- Department of Education, Skills & Employment

Benefit –

- This measure would provide direct financial support to independent international education providers therefore underpinning the sustainability of providers and preserving jobs in the sector.

Support Measure 22 – Extension Of Course Accreditation & Recognition

Many independent higher education providers and Registered Training Organisations (RTOs) voluntarily submit their qualifications for recognition by professional associations, registration and licensing bodies. The benefits are independent third-part recognition that the qualification is suitable for entry into a profession. To successfully achieve accreditation / recognition, the provider needs to dedicate significant human resources.

Support Measure –

That course accreditation / recognition renewal activity due to be held prior to 30 June 2021 be extend by twelve months.

The extension of course accreditation / recognition, where renewal is due before 30 June 2021, will reduce the compliance burden on independent higher education providers and RTOs. This makes available the human resources that can be more appropriately focussed on supporting students and on the staff within higher education providers.

Given the considerable resources of public universities and the public TAFE sector which allows them to have the human resources to focus on compliance activity, it is arguably not appropriate to extend this measure to that sector.

Sector –

- Higher Education
- Vocational Education & Training

Department / Agency –

- Government Registration & Licensing Bodies
- Professional Associations
- Department of Education, Skills & Employment

Benefit –

- This measure ensures that the independent tertiary education sector will have the capacity to support the education and training of the workforce as the economic recovery gets underway.

An Introduction – Independent Tertiary Education Council Australia

The Independent Tertiary Education Council Australia (ITECA) is the peak business organisation representing independent providers in the higher education, vocational education and training sectors.

Independent tertiary education providers support around 80% of the students in vocational education and training plus around 10% of the 1.5 million students in higher education.

ITECA was formed with the intent of allowing the independent tertiary education system to come together, to share experiences and learn about changes to the environment in which education and training is developed. Importantly, ITECA members play a lead role in shaping the policy debate and provide insights to ITECA's Canberra-based policy team.

Recognised by government as an authoritative source of policy advice, ITECA represents the independent tertiary education sector on consultative forums convened by the Australian Skills Quality Authority (ASQA) and the Tertiary Education Quality Standards Agency (TEQSA). ITECA also appoints representatives to committees convened by the Department of Education and also the Department of Employment, Skills, Small and Family Business.

ITECA operates nationally with active committees in each state and territory. These provide a primary resource for member engagement and the link between the independent tertiary education system and state / territory governments.

Given the importance of international education to Australia's economy, ITECA works with government and key stakeholders to ensure that the independent tertiary education sector's contribution to the \$37 billion international student market is understood.

Each year the ITEC Conference brings together stakeholders from the education sector, government and business to discuss the latest issues that affect the sector.

For more information on ITECA visit the website at:
www.iteca.edu.au



The Independent Tertiary Education Council Australia (ITECA) is the peak body representing independent providers in the higher education, vocational education, training and skills sectors.

ITECA's members are united, informed and influential.

Members come together, through ITECA, to create an environment in providers can offer students and their employers the quality outcomes they are looking for.

If you're interested in working with others that share your commitment to quality in order to improve the reputation of the independent tertiary education sector, get involved today.

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