Dear Honourable Senators,

Re: Submission to the Senate Select Committee on the Higher Education and Research Reform Amendment 2014:

Context: Avondale College of Higher Education is a not-for-profit institution that has been providing higher education in Australia since 1897. Currently Avondale offers degrees from Bachelors through to Doctorates in the broad fields of education, nursing, arts, business, science, and ministry/theology.

Support for the Higher Education Reform Legislation: Avondale is supportive of the overall thrust of the proposed higher education legislation:

- We consider that the legislation is a logical next step in the demand-driven system that was introduced by the previous Australian Government. It provides a framework for the sustainability and expansion of the higher education sector that shares the costs between the taxpayer and the student.
- In our view, the proposed deregulation of higher education fees will foster competition in the higher education environment and Avondale does not consider that excessive tuition fee increases to be likely; especially in the private higher education sector. The legislation has adequate protection against fee “gouging” in the proposed Commonwealth Scholarship plan.
- The legislation will provide opportunity for students in the non-university sector to receive Commonwealth Supported Places where this was not available previously; albeit at a lower level of support. This will be an advantage in financial terms for those students who were not presently in the system.

Necessary Adjustments to the Legislation: The following are areas of concern to Avondale and other private providers of higher education:

- The proposal that students in the non-university sector will only receive 70% of Commonwealth Supported Place funding compared with their peers in the university sector, although inequitable, will at least open up CSPs to many students who were previously outside of the system. The university/non-university “divide” in this regard does not take adequate account of the fact that many non-university providers are performing at a high level in terms of learning and teaching outcomes, research output, and higher than average employment results for their graduates.
- The proposed legislation does not take account of the fact that some students in non-university higher education providers are already receiving Commonwealth Supported Places. For instance, Avondale’s nursing and teaching students have had access to CSPs for more than a decade at the 100% level. Avondale has provided research based programs of proven quality and excellent academic and employment outcomes for its students and now, should the legislation be passed as proposed, our future students will be seriously disadvantaged as compared with our present students. This is surely an unintended consequence of the legislation that should be corrected. An equitable solution would be to “grandfather” courses in the non-university sector that already have Commonwealth Supported Places. Or, a better solution would be to amend the legislation to include institutions with research higher degrees (especially PhDs) at the 100% level.

Thank you for the opportunity to provide this submission to your Committee. Do not hesitate to contact me should you require further details or clarifications.

Yours faithfully,

Professor Ray Roennfeldt, PhD
President