IRU submission: *Higher Education and Research Reform Amendment Bill 2014*

**Overview**

The Innovative Research Universities (IRU) supports the passage of the *Higher Education and Research Reform Amendment Bill 2014* (the Bill) with amendments to address weaknesses in the Government’s plan.

The Bill will put in place reforms to higher education that may provide a viable basis for universities over the next decade. The Bill provides a way ahead. It retains open access to government supported higher education. It proposes mechanisms to give universities the resources they need. These combine Government funding with student fees agreed between university and student.

A summary of the elements of the Bill is provided at Attachment 1.

There are five areas in the Government’s plan that the Senate should address as it considers the Bill.

1. **The funding rates in the Bill will reduce funding per student overall by 20%.** This cut should be scaled back to retain reasonable levels of Government investment. The IRU supports the Government’s new five funding tiers, which better distribute the available funding than the current dated grouping of disciplines.

2. **The proposal to index graduates’ HELP debts by the ten-year bond rate rather than the CPI will extend considerably the period of repayment for graduates with lower incomes, particularly those who take time out of the workforce, for example for maternity and parental leave.** This needs to change, with the CPI index retained at least for the debts of graduates not earning sufficient income to make repayments.

3. **The Commonwealth Scholarships Scheme should pool the eligible funds from all providers as the basis for matching the funds for scholarships with the students for whom they are intended.** This will encourage students to choose their university based on their educational preferences.

4. **The IRU opposes the reduction in funding for research students pursuing PhDs and Masters.** This program creates our future research workforce in industry as well as universities. It needs to grow, not shrink.

5. **Universities need support to make the transition to a market based system through a structural adjustment fund.** IRU universities serve outer metropolitan and significant non-capital city regions. We need to test how well the potential students in our catchment areas will respond.

The IRU urges the Senate to pass the Bill with the necessary amendments by the end of 2014. Students are now planning their 2015 studies without knowing the funding and fees that will apply to them from 2016.
Structure of the submission

The IRU submission has three sections:

1. why the key changes in the Bill are needed;
2. the implications of the major policy decisions expressed in the Bill; and
3. the precise changes required to the Bill and other Government programs.

To support our submission we attach three previously published IRU papers:

1. Overview and Analysis: Higher Education and Research Reform Amendment Bill 2014, 8 September 2014
2. Recovering the lost Government subsidy from students, 16 June 2014
3. Using Eligible Students to Drive the Scholarship Fund, 20 June 2014
1. Why the changes are needed

The members of the IRU have been committed from their foundation to providing effective, high quality, future focused education that meets the needs of a wide range of students, many of whom are the first in their families to attend university. To do so requires sufficient resources.

The IRU accepts a system of deregulated university fees as a consequence of the major reduction proposed in Government funding. It is based on the reality that current revenue from Government and students does not support the high quality university education that universities wish to provide and that students and the public expect.

The ongoing problem is the lack of Government investment per student.

There is a well established gap between the resources available to universities and the resources required to meet the long term set and expected standards of higher education.

Additional Government expenditure has targeted expansion of the system but not depth. The value of funding per student, combining Government and student payments, has drifted downwards consistently since the 1980s.

The Review of Australian Higher Education (Bradley Report)\textsuperscript{1} in 2008 concluded that “there are now clear signs that the quality of the educational experience is declining ... student-to-staff ratios are unacceptably high” leading it to argue that “a significant increase in public investment and funding for higher education is warranted”. It proposed an increase of ten percent to the base grants from the Commonwealth but not an increase to student contributions (Bradley, p xii and xv, Recommendation 26).

Bradley recommended that there be a detailed study of the base funding arrangements for universities to provide Government with a coherent case for the necessary level of funding. The Higher Education Base Funding Review (Lomax-Smith)\textsuperscript{2} demonstrated that the gap is real. Its data suggests as much as 20% to 30% additional base revenue is required to match needed expenditure. It reached its conclusion based on current and future requirements for effective higher education.\textsuperscript{3}

In response to these reports the previous Labor Governments expanded investment to support more students, but little went to invest more for each student. Those few elements were the ones whittled away, budget by budget, culminating in the efficiency dividend to apply from 2014, which embedded an ongoing reduction in real value of Government investment.

The current Government is clear that it will not maintain Government funding per student at previous rates. It proposes a 20% reduction to pay for opening Government support to all higher education undergraduate qualifications through any registered higher education provider.

The lesson is clear. Governments will invest in additional students. They will not invest more for each student, regardless of the resources universities need.

A well-resourced, primarily Government funded system is a chimera. Student contributions have grown from around 20% of the resource in the early 1990s through to just over 40% now. The expansion in places since the 1990s has depended on the student payments to offset some of the cost. There is no return from that position.

\textsuperscript{1} Review of Australian Higher Education: Final Report, 2008
\textsuperscript{2} Higher Education Base Funding Review, Final Report, 2011
\textsuperscript{3} IRU Renewing University Base Funding The Priority Issues, 29 February 2012
Restoring limits to the number of students who are funded is not a solution. It would undermine the achievement of the past half-decade. To allow all eligible students a place at university is a fundamental transformation that makes higher education an integral part of the education pathway for Australians. The Kemp-Norton Review of Demand Driven Funding confirmed the value from, and success of, this change⁴.

Hence, IRU will work with the major changes inherent in a system of a base Government contribution combined with student fees set to generate the revenue each university and provider require to provide good quality higher education.

The following section explores the major implications of the proposed changes to inform discussion of the Bill.

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2. The implications of the major policy decisions expressed in the Bill

A fixed Government contribution combined with deregulated student fees

_The funding rates for the Commonwealth Grant Scheme in the Bill should be increased to provide a better balance of Government investment to student payments. The IRU supports the Government's new five funding tiers, which better distribute the available funding than the current dated grouping of disciplines._

IRU members are planning how they will respond to the new arrangements while being very conscious that the final shape of any changes depends on the passage of the Bill.

The need to charge fees higher than current charges is driven by the proposed 20% reduction in Government funding. IRU, along with all university groups, considers the reduction far in excess of a reasonable Government response to its overall fiscal targets. The reduction should be much smaller, investing in the skills, knowledge and social capability crucial to longer-term prosperity and future Government revenue. Retaining a high level of Government investment will permit universities to be more restrained in setting fees.

Since the Government announced its plans on 13 May 2014 there have been many guesses at the level of student fees that universities would charge. Among these the IRU estimated that universities would need to increase the charge across all students by 25% to 30% at an average fee per student of around $10,500 to recover the reduction in Government grant (see Attachment 2).

All the published modeling is based on extrapolations from current practice, which has two core elements.

- Government funding and student charges are set by discipline, with units of study in disciplines that need similar levels of Government or student investment grouped together into funding clusters and student contribution bands. The units a student studies are not always from the same discipline group for Government funding or for student charges. An engineer may take mathematic units; a scientist may take a humanities unit.

- The total resource, Government plus student, is fixed. Over time the balance has shifted to the student but the total amount is largely driven by estimates of discipline cost differentials from the 1990s.

Under the Government’s changes, Government funding will remain based in units of study, with rates set by discipline groupings. The Government has updated the grouping of disciplines into five funding clusters. The IRU supports the new groups which better distribute the available funding than the dated grouping now in use, giving more funding to courses in nursing, education and agriculture whose graduates have a lesser graduate dividend than those in other disciplines.

How student charges are structured will be individual decisions, university by university by non-university provider. We do not know how much fees will be, nor on what basis they will be charged. The major drivers will be the revenue universities need to deliver their full suite of programs the way they best should be, the desire to attract a wide range of students, and the strength, or weakness in the student market course by course.

In 2016 the majority of undergraduate students will be funded and charged under current arrangements. As that proportion reduces to zero by 2021 universities’ responses to the changed fee arrangements will become clearer. It is likely that universities will diverge in the resource they seek for particular degrees so that different approaches to charges will emerge. Many institutions are considering setting the fee by the course regardless of which units a student takes. Students from
particular backgrounds or admission paths may be charged different amounts in the same way La Trobe University has announced for its Aspire students.\(^5\)

**The extension of funding to sub-bachelor places**

_The IRU supports extending access to funding to all enrolments in accredited higher education Diploma, Advanced Diploma and Associate degrees._

Sub-bachelor provision is an important mechanism for developing higher education learning skills as the basis for subsequent bachelor study. It targets individuals with the long-term capability for bachelor study who do not yet have the necessary skills and preliminary learning.

Enrolment in Diploma and Associate Degree programs allows a focus on skill development and essential learning that opens the way for successful students to then complete a degree, with credit gained from the previous study. Enrolment in enabling programs provides a shorter pathway focused at skill development but without credit.

Under initial demand driven plans no restrictions were intended on funded sub-bachelor places. In November 2011 the then Minister, Senator Evans, announced that there would be a cap on funded sub-bachelor places, using the alleged negative impact on diploma and advanced diploma delivery in TAFEs as the rationale.\(^6\)

Including these places within the demand driven arrangements as originally intended will have minimal financial impact and improve the effectiveness of funding overall. Students who go on to enrol in a bachelor degree will be given credit for the earlier study and they will better prepared and so more likely to complete.

Ensuring that the sub-degree pathway is available also reduces the community debate about the suitability of applicants with lower school outcomes entering university by providing a transition process that develops capability for bachelor level study.

**Extending eligibility for funding to all registered higher education providers**

_The IRU argues that higher education providers gaining their first access to funded places should not be given open-ended funding for all enrolled students immediately._

The Bill will give eligibility for Commonwealth supported places to all registered higher education providers if they apply and the Minister approves. It aligns the regulatory and funding regimes.

The extension of access to funding to higher education providers, variously universities, TAFEs, nonprofit bodies, professional bodies, and for-profit providers, carries through Recommendation 29 of the Bradley report that the demand driven arrangements “be extended to other approved providers when new regulatory arrangements are in place”.\(^7\)

The IRU understands that universities have demonstrated the value of demand responsive funding such that the Government can now extend it to all providers. The issues are not about whether to extend but the way in which it is done.

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\(^6\) Senator The Hon Chris Evans, Minister for Tertiary Education, Skills, Jobs and Workplace Relations, “Ensuring a sustainable tertiary education sector” 1 November 2011

\(^7\) [Review of Australian Higher Education: Final Report, 2008, p158](#)
In 2016 universities will have 30% to 40% of Australian domestic students in the deregulated market, with the remainder being protected students enrolled in 2014 who are able to complete their degree programs under the current funding and charging rules. To compete with providers receiving funding for 100% of their students creates an imbalance that adds unnecessarily to the challenge of judging the best balance of courses and fees under the new arrangements.

Further, it is important to avoid the risk of a small number of non-university providers exploiting access to funding for their students, damaging the reputation of the group as a whole.

The Bill also extends access to Other Grants (Part 2-3) and to funded Commonwealth Scholarships (Part 2-4) to all providers subject to Guidelines. The transition provisions of the Bill (186 and 187) prevent additional providers accessing Other Grants or Scholarships until the Minister makes Guidelines to give them such access. This means that any extension is subject to parliamentary disallowance.

The IRU would oppose the extension of research grants to international universities without additional funding for those programs.

**Student loan arrangements**

The proposal to index graduates’ HELP debts by the ten-year bond rate rather than the CPI will extend considerably the period of repayment for graduates with lower incomes, particularly those who take time out the workforce for example for maternity and parental leave. This needs to change, with the CPI index retained, at least for the debts of graduates not earning sufficient income to make repayments.

The Bill runs together the HECS-HELP and FEE-HELP schemes, mostly retaining the sections for FEE-HELP with an update of name to HECS-HELP. The current FEE-HELP rules to set a lifetime maximum loan and to charge a loan fee are removed. These amendments retain the essence of income contingent loans but structured to support a deregulated fee market.

Potential students will have to assess the long-term implications of the debt to be incurred against their perception of likely earnings. The question that should particularly concern potential students is the terms for the repayment of the loan.

The nature of HELP is to ensure repayment as graduates are able to do so, with acceptance that a proportion of the loans will not be repaid due to students who do not ever earn enough to do so.

The Government’s proposed change to the annual index for outstanding debts, from the CPI to the ten year bond rate, pushes the balance towards recovering the full cost to Government of making the loans. This will have the greatest effect on those whose earnings are below the repayment threshold for some years but which then rise sufficiently to require payments. By that point their debts will have increased substantially ahead of inflation.

The IRU opposes the change to the index rate. It is important that prospective students are confident that the loans they incur can be repaid should they earn a graduate level income.

A report from Bruce Chapman and Timothy Higgins\(^8\) proposes two options for Government that would both achieve the Government’s objective to reduce Government costs from the loans and be less regressive to students. One is to add a loan fee, estimated to be 25%, to all loans up front thus increasing the cost to all students. The second is to apply the proposed new index to the debts of

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\(^8\) HELP Interest Rate Options: Equity and Cost, July 2014
people who earn enough to make HELP repayments, retaining the CPI index for those with lower earnings.

The second option would protect graduates during the years in which earnings are low and provide additional payments to Government reducing the total cost of the scheme.

IRU would prefer retention of the current CPI index to be applied to all debts. Should the Government hold firm to the need to reduce the cost to it from HELP the second Chapman-Higgins proposal provides a viable solution which IRU would support.

Support for students: Commonwealth Scholarships Scheme

The IRU proposes that the amount destined for the Commonwealth Scholarships Scheme from each provider be pooled and redistributed back to providers based on the proportion of the target group of students each enrolls. Universities would retain the responsibility to decide how to allocate the scholarship funds.

Full details of the IRU proposal are set out in the statement at Attachment 3.

The Government’s proposal for the Commonwealth Scholarships Scheme is that all universities and other providers with at least 500 full time equivalent students allocate a portion of fee income to support scholarships for students from disadvantaged backgrounds. Each university would use the scholarship funds it raises to support its students, targeting those eligible. The university will determine how much each student receives and any conditions for use of the scholarships.

Because the funds remain within each institution the driver of the scheme is the fees people not eligible for scholarships pay, rather than the needs of people eligible for support. The likely result is that the more scholarship funds a university has the fewer eligible students it has to support with scholarships.

Further, universities with high fees but low numbers of target students have no incentive to increase the number of eligible students they enrol.

The scholarship program needs to refocus support for the eligible students, ensuring they receive the funds available to use at the provider of their choice.

The IRU proposal makes the student the driver. It means that each of the institutions a target student is considering will have funds to support a scholarship of similar size. Hence the student can decide which university to attend on the basis of the educational value they will receive. It creates the incentive for institutions to increase the enrolment of target students to retain all the revenue their students contribute to the pool.

Under both approaches students’ fees are used to support other students: the Government scheme is predicated on funds from students in an institution being used to support other students in that institution; the IRU proposal extends the use to support students in any institution.

The implications for higher education quality

The proposed changes require the national higher education quality arrangements to develop in tandem with the funding and regulatory changes.

There will be at least two new pressure points:

- greater variation in the nature of delivery, with similar programs operating from quite different resource bases; and
• the incentive for additional providers to enter higher education, once Government funding becomes available, and for current, non funded providers to expand their delivery.

The effectiveness of TEQSA will be crucial. Over the past year TEQSA has refocused its arrangements to ensure it targets providers with greater likelihood of risk, such as those new to higher education or those seeking accreditation of new courses in new areas. IRU has separately supported amendments to the TEQSA Act designed to assist it to refocus.

It is important that TEQSA continue to use the standard time frames to respond to applications for registration and for accreditation to prevent new providers and courses being rushed untested into the market. A considered assessment of new providers and new courses helps ensure that they will be effective additions to the options available.

The changed funding arrangements are likely to attract more providers. The increased competition will see some providers flourish, others struggle, and some simply choose to finish up. The quality system will need to be sufficiently robust to work with this, to facilitate provider entry and exit, while ensuring students are not adversely affected.

Supporting research capacity in universities

The cuts to the Commonwealth Grant Scheme affect university research outcomes as well as teaching. The cuts should be scaled back to retain reasonable levels of Government investment.

The reduction in university base funding through the Commonwealth Grant Scheme (CGS) puts pressure on the universities’ capability to retain research as an integral activity that can support the research funded through external grants and contracts.

University base funding is the prime source of salary and related costs for most academic staff. The research block grants, which include the Research Training Scheme (see further below), funded through the HESA Other Grant sections, are the other source of ongoing Government funding for research. Research grants through the Australian Research Council and National Health and Medical Research Council and other external sources rely on universities’ capacity to support an effective research eco-system.

The 30% differential in CGS funding between universities and other non-university providers highlights the expectation for universities to support research, the reduction in total funds hinders the achievement.

The issue is particularly important for members of the IRU, which were established as research-intensive universities in the outer urban areas of Australia’s capitals and in major provincial cities to stimulate economic, social and personal advancement. IRU members are the main counter to the tendency for Australian research and researchers to concentrate in the inner circle of Australia’s capital cities.

The universities’ research strengthens the social and economic prosperity of their regions, linking them to global opportunities. The focus of IRU members in northern Australia on links to the neighbouring Asian countries is one notable example.

To achieve the outcomes expected requires an effective research eco-system that supports researchers, linking them to researchers elsewhere in Australia and the world. Universities’ base funding through the CGS and block grants is critical to doing so successfully.

Hence, as argued above, the CGS reduction should be much smaller, investing the funds retained in the skills, knowledge and social capability crucial to longer-term prosperity and future Government revenue.
Developing Australia’s research workforce

The IRU opposes the reduction in funding for research students pursuing PhDs and Masters. To cut it back only puts at risk our future research workforce.

The Government’s proposal to reduce the Research Training Scheme (RTS) by 10% would hamper universities’ capacity to develop future researchers. It would mean that not only has Government support for research training not increased since the Scheme was created in 2001 it would now decrease.

The number of Australian students undertaking higher degrees by research has been relatively flat for at least a decade. At the same time, international enrolments have increased substantially, particularly in science, technology, engineering and mathematics (STEM) as shown in the Table.

The RTS reduction is not reflected directly in the Bill, since payments for the RTS sit within the funds appropriated for the Other Grants, but Schedule 5 Part 2 is a consequence.

The amendments would allow universities to offset the reduction in the RTS by charging research students. The amendments treat research students solely as students consuming resources for a potential payoff following graduation. It ignores the important, active, contribution research students make to research output whether individually or as part of research teams.

A thorough rethink of the place of research students is required to address the mechanisms by which Government supports their development and their living costs. This should ensure coherence with undergraduate funding where universities are funded for all students who enrol. The Government should be encouraging additional research students not discouraging enrolments.

Postgraduate Research students 2004-2013 by Citizenship and Discipline
(Equivalent Full Time Student Load)

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<tr>
<td>Domestic</td>
<td>STEM Fields</td>
<td>10,989</td>
<td>10,621</td>
<td>10,542</td>
<td>10,594</td>
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<td></td>
<td>Other Fields</td>
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<td>16,191</td>
<td>16,978</td>
<td>18,093</td>
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<td>26,812</td>
<td>27,520</td>
<td>28,687</td>
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<tr>
<td>International</td>
<td>STEM Fields</td>
<td>3,048</td>
<td>4,124</td>
<td>6,791</td>
<td>9,386</td>
<td>208%</td>
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<tr>
<td></td>
<td>Other Fields</td>
<td>3,278</td>
<td>3,723</td>
<td>5,363</td>
<td>6,212</td>
<td>90%</td>
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<td>Total</td>
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<td>6,326</td>
<td>7,847</td>
<td>12,154</td>
<td>15,598</td>
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Source: Department of Education Higher Education Statistics Data Cube
STEM Fields include Natural and Physical Sciences; Agriculture, Environment and Related Studies; Information Technology and Engineering and Related Technologies
Ensuring an effective transition for higher education providers

The IRU supports the creation of a structural adjustment fund to support the transition to the new arrangements for potentially adversely affected universities.

The Government’s changes to higher education funding and the arrangements for student fees will create much uncertainty as universities, other providers and potential students work out how the new arrangements will operate in practice. Universities need support to make the transition to a full market based system to avoid unnecessary negative consequences that would counter the Government’s broad objectives.

IRU members, as universities serving outer metropolitan and significant non-capital city regions, need to test how potential students in our catchment areas will respond.

The potential issues include major shifts in where students enrol, reductions in revenue if students are not willing to pay, the level of fees required to maintain sufficient revenue, undermining of research capability dependent on base funding, and the closing down of special delivery options to target regions which have been explicitly subsidised from the main operations of a university.

A structural adjustment fund will assist universities to make the transition. The fund should support universities through the transition to avoid nationally undesirable outcomes. It should target agreed national issues of importance, but avoid geographically based presumptions of need.
3. Amendments to the Bill and Government policy

Based on the previous two sections of this submission the IRU has identified three areas in the Bill where amendments should be made. These are set out below.

1. Schedule One, item 45: Increase the funding rates in the Table at 33-10 to limit the reduction in Commonwealth Grant Scheme funding to less than 20%.

2. Schedule Two, item 1: new 36-75(4) Amend to reflect that the provider’s ‘eligible amount’ is based on the funds raised nationally to support the scholarships.

3. Schedule Three: Reject the Schedule in order to retain the current indexation arrangements for HELP debts, for at least the debts of graduates not earning sufficient income to make repayments.

The IRU supports other changes to the Government’s policy that do not require amendments to the Bill itself but which should be a condition for the Senate to support the Bill. These are:

4. giving up the proposed 10% reduction to funding for the Research Training Scheme; and

5. creation of a Structural Adjustment Fund, which would be administered as an Other Grant.
Overview and Analysis: Higher Education and Research Reform Amendment Bill 2014

The Commencement dates reflect the 1 January 2016 start date for the main changes, with differences for:

- change of title for University of Ballarat and increases to ARC funding, immediate on assent of the Bill;
- the NZ inclusions and the abolition of the HECS-HELP benefit from 1 January 2015; and
- the new lower first repayment threshold for HELP debts from 1 July 2016, to apply to 2016-17 income tax year.

Schedule 1: Deregulation, expansion of demand driven system and other measures

Part one, Main amendments

The Objects of the Act (Division 2) are not changed.

International providers:

- The current inclusion of some international providers in Table C is removed from the Act. In its place international providers are defined as those not established in Australia nor based in Australia. They need appropriate TEQSA approval as do all other providers.

- The key change is capacity for access to funding which can include CGS plus HECS-HELP for their students, Other Grants and Commonwealth Scholarships (eg APAs) subject to the requirements of the Act, and their students’ access to HELP. Access to the last two is subject to Guidelines, which are yet to be released for comment.

- The transition provisions of the Bill (186 and 187) prevent International Providers accessing Other Grants or Scholarships until the Minister makes Guidelines that give them such access. The official position is that there is no policy change intended.

- An amendment to ESOS (under Part Three Consequential Amendments) includes ‘international providers’ under ESOS, so capturing any international student enrolling in an international provider’s Australian operations.

Higher Education Providers

- A provider is defined as one registered by TEQSA and approved by the Minister under HESA. This gives a clearer link between TEQSA approval and access to funding and HELP. The link had been inserted previously but less clearly (the, to be deleted, 16-27).

- The HESA approval requires a provider to apply after the TEQSA approval but there is little additional scrutiny involved – which makes sense. Hence all providers can be eligible for support but some may choose not to ask.

- The Table A and B lists are retained but with very few explicit uses to remain. The lists could be removed but they serve to highlight the importance of the providers so listed.

- Throughout the Act there are proposed new sections to allow the Minister to take account of relevant TEQSA advice. This should reduce duplication of advice. Other sections, which duplicate considerations or actions which the TEQSA Act covers, are removed.
Quality and Accountability requirements

- Financial viability: 19-12 amended to allow that the Minister ‘may’ rather than ‘must’ have regard to financial statements from the provider. This allows the Minister to rely solely on TEQSA advice if s/he so wishes. It is doubtful that TEQSA advice on financial viability is of value but while it remains in the standards the provision makes sense to avoid a separate analysis of the same data.

- The quality and fairness provisions remain essentially as it with amendments that tidy up language (eg removal of FEE-HELP references).
  - Fairness of treatment in selection, services and presumably fees remains a general test. This might be an issue from time to time with some non-university providers.
  - The requirements not to force membership of student bodies and the rules around charging and use of student services and amenities fees remain in place. These are a question of ‘fairness’.

- Tuition fee requirements
  - The Bill deletes much that was previously in place about how to determine student contributions and formally tuition fees, including the requirement for a schedule by unit of the fee to be charged.
  - New requirements are that fees be charged by unit of study but this does not prevent universities setting the charge by the qualification or other basis. In effect whatever the planned fee is it must be capable of being presented in terms of each unit and included in an invoice making it clear. This provides the legal basis for any HELP debt and dispute about what was borrowed.
  - The struggle is the conflict between notionally deregulating fees and wanting some constraint on what is eligible for HELP. This exists now for FEE-HELP but becomes mainstream with all CGS places included.
    - So the Bill continues the existing arrangement whereby students cannot be charged fees for the course of study greater than the sum of the tuition fees per unit taken
    - Tuition fees must be “directly in respect of the provision of the unit”
    - ‘fee’ for a course of study however does not include things such as amenities and services fees, for accommodation, or otherwise incidental (as defined in Guidelines).

To extent that universities are considering the bundling of various potential services they would still need to distinguish the ‘tuition’ element, HELP eligible, from other, non HELPable services. The Department indicates that it will police major cases of other services bundled into the HELP element.

This does not seem to prevent use of the tuition funds to generate surpluses which are then used for other purposes such as research (or does it?). Part of the problem is that the input focus emphasises ultimately the cost of providing a good or service rather than the price for gaining a degree.

Student services and amenities charge remains distinct and permitted, presumably to avoid the political heat of touching an item totemic to both sides of parliament. The reality is that if a university did not charge it but allocated funds to support such services and amenities (from its general revenue, including tuition fee surplus) it could do so.

- The compact requirements are to be removed.
• The requirement for upholding free intellectual inquiry, 19-115 - remains in place for Table A and B providers only. The current provider standards require all providers to have “a commitment to and support for free intellectual inquiry”. It may be a case that no Government wishes to be seen to remove such a requirement even if superfluous.

CGS: eligibility
• The grant remains paid as benefit to students, retaining constitutional cover, where there is a funding agreement in place. The removal of the compact requirement places the focus back on an agreement. Each of the new providers will need an agreement in place for funding from 2016.
• Distinctions between Table A and other providers who can be funded for national priority purposes are removed.
• Designated places remain for those few areas controlled – medicine, postgraduate coursework, with enabling added explicitly. Provision remains for the Minister to designate other courses if so desired.
  – Current instrument is revoked (see Part 5 below). This designates sub bachelor and enabling places so controlling the number to be funded.
• The Funding Agreement provisions remain largely intact, with the addition of two extra possible areas to cover participation in surveys and information to be made public. It updates the provision to specify a maximum basic grant which cannot be less than the grant for the previous year.
• Note that the Agreement still can define a maximum number of undergraduate places should the Minister so wish – this could be relevant to phasing in access by currently non funded providers. These are powers which could be used but generally are not, giving Government some levers should a provider engage in activity undermining the spirit of the Act.

CGS grant amount
• This updates the basis of the calculation to be the same for all providers.
• The distinction in rates between universities and others comes at 33-10. The wording to identify universities refers to a ‘provider category that permits the use of the word ‘universities’. With the current argument that provider categories as such are not needed it would be better to avoid that particular term to use a reference to registration as a provider permitted to use the title ‘university’.

CGS Conditions of grant
• The Bill removes many complicated provisions about whether a student is a commonwealth supported student to focus on the student applying for support (for the Government funding, not for HELP) and all other requirements being in order.
• A student must be primarily based in Australia, consistent with not funding Australians living internationally. There is no intent to change current arrangements for students on exchange.
• A person can continue to notify the provider they are not to be Commonwealth supported. Not immediately clear why someone would but useful to capture idea.
• The new 36-55 allows for Guidelines to define how students who are not Commonwealth supported are charged. This includes the rules for charging international students (who clearly are not Commonwealth supported), which is where the requirement that the international fee must be at least equal to the Commonwealth supported student fee will be articulated.
That rule will need to apply at the level at which the university defines the fee (e.g., the whole program) not necessarily at the unit level. An international student from a moderately low-cost program could be in a unit alongside a domestic student from a higher cost program through the unit being an option in multiple programs.

Other Grants

- The table of various grant types is updated and the column of eligible entities removed. The list of simplified so that for example there is no ongoing reference to systemic infrastructure since it is covered by the head of power for capital expenditure.
- Eligibility will be defined in the Other Grant Guidelines, with the proviso that no currently ineligible provider can become eligible until and if the Guidelines are made. The question is thus the long term capacity for eligibility to widen as a Government, subject to parliamentary scrutiny, decides.

Commonwealth scholarships

- Covers research student scholarships and others Government directed scholarships of which there are now few, with Start Up and Relocation covered in Social Security legislation.
- Eligibility, as for Other Grants, for the non-research scholarships extends to all providers if Guidelines so determine.
- Research scholarships are open to Table A and any other university – including the international universities if the Guidelines so determine. This hangs on the transition provision 187.

No change to Reduction and Repayment of grants sections.

HECS-HELP loans

- The Bill runs together the HECS-HELP and FEE-HELP provisions, mostly retaining FEE-HELP with update of name to HECS-HELP. FEE-HELP rules about maximum loan amounts and loan fees removed.
- Point 73 of Schedule 1 repeals Divisions 90 to 96 while points 1 and 2 of Schedule 10 (NZ students) amends the, to be repealed, Section 90-5. A question of timing – the NZ amendments apply for 2015 until Schedule 1 kicks in in 2016.
- Arrangements for students to argue for repayment of HECS-HELP in special circumstances. Parallels current arrangements but moved from Chapter 2. Period during which the provider can accept a request is limited to two years after the initial one year period. This is to halt decisions to revisit the HELP charge at periods long after the period of study.

OS-HELP and SA-HELP not changed.

Loan repayments. Amendments revise to accommodate integration of HECS and FEE-HELP into new HECS-HELP.

Administrative requirements

- Largely tidy up amendments.
- Deletion of sections requiring providers to charge either a student contribution or tuition fee reflect that the Bill would not require charging of a fee, merely allow one to be charged.
- No provision for students to be exempt from charges – because no requirement to charge. All is up to the provider to decide (fairly).
Part two, Application, saving and transitional provisions

Preserved funding students to whom the current funding and student contribution arrangements apply through to end of 2020. Designed to cover a wide range of stories – it is inclusive not exclusive:

- student must remain enrolled in a course of study but can move to new courses of study over that time, with no more than a twelve month gap;
- covers those at 14 May 2014 who were
  - enrolled,
  - had a deferred place approved, or
  - had accepted a place but not completed the enrolment process.

Various precise points to cover decisions and actions that work across the transition point from current Act to proposed new Act. These seem to make sense without close reading of each one. Includes the restriction on extending access to Other Grants and Scholarships until Guidelines are made which define the extension.

Part three, Consequential

- Amendments to ANU Act;
- ESOS, to include international providers as to be defined in HESA; and
- to update the Income Tax Assessment Acts of 1936 and 1997. It replaces the restriction on claiming student contributions as an education expense with a restriction on Tuition fees for a Commonwealth Supported Place. That is nothing appears to change.

Commonwealth should make a small saving from those paying fees to non funded providers who in the future will become Commonwealth supported, and thus not able to claim fees as education expenses. This might lead some students to consider the relative benefit of being Commonwealth supported.

Part four, Amendment of CGS Guidelines

Defines the five clusters by detailed discipline sets.

Part five, Repeal

Repeals list of designated courses covering sub-bachelor and enabling places. Enabling added to Act as explicitly designated, hence the number of places is controlled.

Issues to consider

1. Policy issues about the size of the CGS reduction and the equity of treatment in the capacity for non funded providers to enter the CGS with all enrolled places from 2016 (when currently funded providers will have to transition to all students being subject to deregulated fees).
2. Embedding of international providers with access to funding schemes controlled through Guidelines.
3. Definition of tuition fee, controls of which services can be charged against HECS-HELP, and university flexibility to offer bundles of services.
4. Reference to provider categories to define universities (33-10)
5. Precision in the rule linking international and domestic fees to ensure considered on a strictly comparable base of the same course of study.
Schedule 2 Commonwealth Scholarships Scheme

The Scholarships scheme is included as a new requirement for receipt of CGS.

The funds are to be allocated within six months of the year following collection. This gives provides reasonable time to be sure of the precise amount and to have allocated the funds usefully.

The Bill is broad about the uses: targeting access, participation and completion by students from disadvantaged backgrounds. The CGS guidelines can add to this. Hopefully they do not specify very much beyond defining the eligible students.

The calculation of the amount for scholarships reflects the policy.

- The 20% figure can be lower (not higher) by means of the Guidelines (disallowable so it need a good case for Parliament).
- The Guidelines can determine the process for working out eligible revenue, which could be used to avoid being stuck with the complicated mess set out in (8) to determine the ‘comparison revenue’ once calculated for the first year.

Issues to pursue

6. Consider how a pooling scheme would best be presented.
7. Work with Department to simplify the calculation of eligible revenue in later years of scheme.

Schedule 3 Indexation of HELP debts

Does what is required to replace the CPI with the ten-year bond rate as the basis for indexing outstanding HELP debts.

To allow for CPI when the debtor’s income is less than the first threshold and for the bond rate for those with income at or above will require amalgamation of the current sections with the proposed new sections.

Issues to pursue

8. Oppose change of index to ten year bond rate, giving consideration to Chapman-Higgins alternatives.

Schedule 4 Minimum repayment income for HELP debts

Resets the income points for the repayment bands and adds in the new lowest band with a 2% repayment rate.

There are no issues with this.

Schedule 5 Research funding and research students

Part 1 amends the ARC Act to increase the maximum amounts which the ARC may expend and adds in 2017-18. This covers both the extension of the Future Fellowships and the reduction for the efficiency dividend. The new maximum amounts are all higher than those previously defined, however funding is still set to drop, year on year, through to 2016-17, and increase thereafter.

Part 2 creates the proposed arrangements for research students to be charged through the introduction of a new set of Other Grant conditions specific to the research student grants.
• New 41-26 (1) and (2) set out that a research student cannot be charged more than the two arbitrary amounts defined in the policy. A determination under the current act under 169-20(1) holds that students classified as RTS students by their provider are exempt from tuition fees.

• Subsection (3) allows each university to define who is or is not an RTS student. Non-RTS students are currently permitted to be charged a fee, with a few universities doing so.

Part 3 repeals the determination under 169-20(1) exempting RTS students from tuition fees (see above). Division 169-20 itself is repealed under Schedule 1.

Part 4 amends the Other Grant Guidelines (Research) 2012, primarily to define which research training courses are high and which low cost. These are in line with current high cost / low cost split used in the calculation of the RTS grant amount.

Issues to pursue
9. The IRU case against reduction to the RTS and the long term arrangements for how research students are or are not charged.

Schedule 6: VET FEE-HELP loans fees and limits
This brings VET FEE-HELP into line with the new HECS-HELP in not having limits and fees. Detail is not an area that IRU needs to be across.

Schedule 7: HECS-HELP benefit
The HECS-HELP benefit is a payment in the form of reduced HELP repayments or reduced outstanding debt for people working in relevant fields and regions. The Government is removing the benefit. The Schedule hunts out all references to the benefit to remove them from the Act and the Income Tax Assessment Act.

IRU has not objected to this saving, on grounds that the benefit has little obvious impact beyond reducing the debt of the eligible students, without actively leading more graduates to work in the areas which create entitlement.

Schedule 8: Indexation of amounts
The amendments change the basis for indexation from a mix of CPI and Labour Price Index to solely being CPI. The presentation is revamped but the effect is the same.

• This change has received little discussion. It is presented as a savings measure, which generally it would be. In some years it may not be where CPI exceeds the LPI. There is some humour in the Government removing the CPI as an index in one place to insist in this context that it be the index.

Schedule 9: University name change
Updates name of the University of Ballarat into Federation University.

Schedule 10: New Zealand citizens
The amendments add the definition of eligible New Zealand students (came to Australia as a child and have lived considerable parts of their life here since) to all relevant parts of the Act. The decision is a positive one.

8 September 2014
The Higher Education reforms: Recovering the lost Government subsidy from students

The Department has released the proposed clusters and funding rates from 2016, which simplify the clusters into five groups but also achieve a 20% reduction overall in funding.

The proposed clusters are based on a 0.6:2:3:4:6 relative distribution across disciplines as shown in Table One. This will finally remove the remnants of the 1990s relative funding model.

The reduction in the funding available per students of 20% is significant, spreading Government support over a large number of students at lower rates. IRU does not support the reduction but foresaw it as a probable Government savings measures and an inevitable consequence of any move to remove controls over student fees. Those who advocated for removing controls over fees can hardly be surprised, albeit some are.

For universities to recover the reduction through increases to student charges requires an overall increase of 25% to 30% across all students at an average fee per student of around $10,500.

Comment to date has focused on how to preserve total revenue at the level of each particular discipline. This is clinging to the existing clusters, whose failings the Lomax-Smith report well documented. As the starting point for future planning each university need to determine a simple set of charges that will raise total revenue from student and Government equal to the current revenue. They could use these charges in 2016 knowing that revenue per student would be stable or use them as the basis to set fees that raise additional or lesser revenue.

Table Two shows how universities could offset the lost Government revenue, with options for:

- a single common charge;
- increases to the current three bands; and
- a four band system to match the proposed five clusters, with the same charge for clusters 1 and 5 similar to the current arrangements.

These are calculated at the national level based in 2012 load data. Replacing the national figures by university level figures will allow charges relevant to each university to be estimated.

Conor King
16 June 2014
<table>
<thead>
<tr>
<th>Cluster</th>
<th>Disciplines</th>
<th>$ / EFTSL</th>
<th>Relativity</th>
</tr>
</thead>
<tbody>
<tr>
<td>Cluster 1</td>
<td>Law, Accounting, Administration, Economics, Commerce</td>
<td>$1,805</td>
<td>0.6</td>
</tr>
<tr>
<td>Cluster 2</td>
<td>Humanities, Social Studies, Communications (excluding Audio-Visual)</td>
<td>$6,021</td>
<td>2</td>
</tr>
<tr>
<td>Cluster 3</td>
<td>Computing, Behavioural Science, Welfare Studies, Education, Visual And Performing Arts, Built Environment, Other Health</td>
<td>$9,033</td>
<td>3</td>
</tr>
<tr>
<td>Cluster 4</td>
<td>Mathematics, Clinical Psychology, Allied Health, Nursing, Engineering, Science, Surveying, Environmental Studies, Foreign Languages</td>
<td>$12,045</td>
<td>4</td>
</tr>
<tr>
<td>Cluster 5</td>
<td>Dentistry, Medicine, Veterinary Science, Agriculture</td>
<td>$18,067</td>
<td>6</td>
</tr>
</tbody>
</table>
### Table 2: Student Revenue Break Even Scenarios

<table>
<thead>
<tr>
<th>Discipline bands</th>
<th>Base Load 2012 (note 1)</th>
<th>Current student charge (2016 indexed)</th>
<th>Break Even Student Charge 2016 (note 2)</th>
<th>Total Student Revenue - Break Even Scenarios</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td></td>
<td>Current student charge</td>
<td>Break Even Student Charge</td>
<td></td>
</tr>
<tr>
<td></td>
<td></td>
<td>Base Load 2012 (note 1)</td>
<td>Charge 2016 indexed</td>
<td></td>
</tr>
<tr>
<td>Law, Accounting, Administration, Economics, Commerce</td>
<td>101,572</td>
<td>$10,523</td>
<td>$10,729</td>
<td>$10,362 $13,300 $12,686 $12,474</td>
</tr>
<tr>
<td>Humanities</td>
<td>17,829</td>
<td>$6,307</td>
<td>$5,870</td>
<td>$10,362 $7,971 $8,470 $7,796</td>
</tr>
<tr>
<td>Social Studies</td>
<td>42,881</td>
<td>$6,307</td>
<td>$10,164</td>
<td>$10,362 $7,971 $8,470 $7,796</td>
</tr>
<tr>
<td>Communications (excluding Audio-Visual)</td>
<td>21,150</td>
<td>$6,307</td>
<td>$12,434</td>
<td>$10,362 $7,971 $8,470 $7,796</td>
</tr>
<tr>
<td>Computing, Built Environment, Other Health</td>
<td>46,751</td>
<td>$8,987</td>
<td>$9,833</td>
<td>$10,362 $11,358 $11,150 $9,356</td>
</tr>
<tr>
<td>Behavioural Science, Welfare Studies</td>
<td>20,569</td>
<td>$6,307</td>
<td>$7,152</td>
<td>$10,362 $7,971 $8,470 $9,356</td>
</tr>
<tr>
<td>Education</td>
<td>44,767</td>
<td>$6,307</td>
<td>$7,551</td>
<td>$10,362 $7,971 $8,470 $9,356</td>
</tr>
<tr>
<td>Visual And Performing Arts</td>
<td>28,727</td>
<td>$6,307</td>
<td>$9,422</td>
<td>$10,362 $7,971 $8,470 $9,356</td>
</tr>
<tr>
<td>Mathematics</td>
<td>17,664</td>
<td>$8,987</td>
<td>$6,821</td>
<td>$10,362 $11,358 $11,150 $10,915</td>
</tr>
<tr>
<td>Clinical Psychology</td>
<td>5,760</td>
<td>$6,307</td>
<td>$6,410</td>
<td>$10,362 $7,971 $8,470 $10,915</td>
</tr>
<tr>
<td>Allied Health</td>
<td>12,543</td>
<td>$8,987</td>
<td>$9,091</td>
<td>$10,362 $11,358 $11,150 $10,915</td>
</tr>
<tr>
<td>Nursing</td>
<td>28,778</td>
<td>$6,307</td>
<td>$7,825</td>
<td>$10,362 $7,971 $8,470 $10,915</td>
</tr>
<tr>
<td>Engineering, Science, Surveying</td>
<td>90,135</td>
<td>$8,987</td>
<td>$14,214</td>
<td>$10,362 $11,358 $11,150 $10,915</td>
</tr>
<tr>
<td>Foreign Languages</td>
<td>11,060</td>
<td>$6,307</td>
<td>$6,410</td>
<td>$10,362 $7,971 $8,470 $10,915</td>
</tr>
<tr>
<td>Environmental Studies</td>
<td>4,197</td>
<td>$8,987</td>
<td>$18,863</td>
<td>$10,362 $11,358 $11,150 $10,915</td>
</tr>
<tr>
<td>Dentistry, Medicine, Veterinary Science</td>
<td>19,714</td>
<td>$10,523</td>
<td>$14,377</td>
<td>$10,362 $13,300 $12,686 $12,474</td>
</tr>
<tr>
<td>Agriculture</td>
<td>2,822</td>
<td>$8,987</td>
<td>$12,841</td>
<td>$10,362 $11,358 $11,150 $10,915</td>
</tr>
<tr>
<td><strong>Total Student Base Load 2012</strong></td>
<td><strong>516,919</strong></td>
<td></td>
<td></td>
<td><strong>Total Student Contribution Revenue</strong></td>
</tr>
<tr>
<td><strong>Total Student Contribution Revenue</strong></td>
<td><strong>$5,356,318,803</strong></td>
<td><strong>$5,356,318,803</strong></td>
<td><strong>$5,356,318,803</strong></td>
<td><strong>$5,356,318,803</strong></td>
</tr>
</tbody>
</table>

**Note 1:** Banding for 2012 load are estimates based on Students 2012 - All Student Load, Table 4.5: Actual Student Load (EFTSL) for All Domestic Students by Narrow Discipline Group and Broad Level of Course, Full Year 2012

**Note 2:** The break even student charge for 2016 is calculated by combining the variance between the current (indexed to 2016) and new Commonwealth contribution and the current student charge (indexed to 2016).

**Note 3:** Here, students are all charged the same fee regardless of course of study.

**Note 4:** This increases the current student charges by a common percentage amount (in this case 26.4%) to achieve break even revenue.

**Note 5:** This increases the current student charges by a common dollar amount (in this case $2,163) to achieve break even revenue.

**Note 6:** This creates four new bands for student charges in line with relative levels of Commonwealth support, with two changes. 1. Business and law subjects where the Commonwealth contribution is very low is set at the same rate as medicine and dentistry subjects, consistent with current arrangements. 2 Agriculture is tied back to other science disciplines and professions.
Using eligible students to drive the Scholarship Fund

The Government proposal

The Government’s proposal is that all universities and other providers allocate a proportion of fee income to support scholarships for students from disadvantaged backgrounds. Each university would use the scholarship funds it raises to support its students, targeting those eligible. The university will determine how much each student receives and whether it defines how the scholarship may be used.

- The rationale for the scholarships is broadly clear but open to criticism. The intent is to reduce the risk that students from poorer backgrounds will be deterred from university or from some universities due to high fees and the cost of living while studying. The rationale for allowing universities to charge much higher fees is that the HELP scheme removes the financial deterrent; hence the most coherent argument for the scholarships focusses at living costs.

- The definition of which students are eligible remains to be settled. Some bounds will be needed, however too specific criteria could be problematic in both including some who have little need (which a university could cope with) and excluding some who do.

- The amount which is to be used for scholarships is 20% of the revenue a university (or other provider) receives above the revenue they would currently receive for that set of students. This threshold is somewhat clumsily expressed and will become a historic curiosity quickly – IRU has put to the Department of Education a means to use the calculation for 2016 as the base for giving universities and other providers a simple, dollar based, revenue benchmark above which the 20% amount applies.

Problems with the proposal

By containing use of the funds to within each institution the driver of the scheme is the fees people, not eligible for scholarships, pay, rather than the needs of people eligible for support. The likely result is an inverse relationship between the amount of scholarship funds a university has and the number of eligible students it enrolls.

This is based on the assumption that the universities most likely to set the highest fees are the older universities which currently have fewer such students. The low SES measure is a good proxy for this. The attached table shows the range of low SES enrolment by university.

The scholarships encourage recruitment games by institutions. Scholarships can be used to target potential students not prioritising that university. Hence a sought after applicant may face the choice of going to the initially preferred university X, with little or no support for living costs and fees, against going to University Y with a substantial scholarship.

The universities most able to do this will be those with the highest prior public investment that has created the value they will now be able to leverage into higher fees.

The scholarship program needs to refocus on support for the eligible students, ensuring they receive the funds available to use at the provider of their choice.

The IRU proposal [consistent with the Regional Universities Network argument]

The IRU proposal is that the amount destined for scholarships from each provider be pooled and redistributed back to providers based on the relative proportion of the target group of students each enrolls. Universities would retain the responsibility to decide how to allocate the scholarship funds.

A half way approach would pool a proportion of the funds only for redistribution (eg 60%).
The proposal makes the student the driver, creating the likelihood for a given eligible person that each of the institutions they are considering will have funds to support a scholarship of similar size. Hence they make a decision on the basis of the educational value they will receive.

The rationale for forcing a redistribution of the scholarship funds is that the higher fees are only possible because of the Government’s student loans (HELP) and previous Government investment in institutions which has created the universities we now have with highest public standing. The Government scheme is predicated on funds from students in an institution being used to support other students in that institution. The proposal extends the use to support for students in any institution.

Institutions with high fees but low numbers of target students would have incentive to increase the number of eligible students to retain more of the fee income from their own students. However it is likely that many will be constrained by a commitment to retain high entry requirements.

We are not advocating for a national allocation of scholarships by Government to those eligible. This would require common, easily measureable, allocation criteria and standard payment amounts. It would completely overturn the Government’s proposal and remove any local level targeting of funds to individual circumstances more subtly than simple income testing can achieve.

Conor King
20 June 2014
## Domestic Undergraduate Students by Socio Economic Status

<table>
<thead>
<tr>
<th>State / Provider</th>
<th>Low SES Students</th>
<th>All Students</th>
<th>% Low SES</th>
</tr>
</thead>
<tbody>
<tr>
<td><strong>New South Wales</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Charles Sturt University</td>
<td>5,620</td>
<td>23,202</td>
<td>24%</td>
</tr>
<tr>
<td>Macquarie University</td>
<td>1,427</td>
<td>19,868</td>
<td>7%</td>
</tr>
<tr>
<td>Southern Cross University</td>
<td>2,534</td>
<td>9,404</td>
<td>27%</td>
</tr>
<tr>
<td>The University of Sydney</td>
<td>1,967</td>
<td>26,630</td>
<td>7%</td>
</tr>
<tr>
<td>University of New England</td>
<td>3,871</td>
<td>12,190</td>
<td>32%</td>
</tr>
<tr>
<td>University of New South Wales</td>
<td>2,155</td>
<td>24,376</td>
<td>9%</td>
</tr>
<tr>
<td>University of Newcastle</td>
<td>5,510</td>
<td>20,169</td>
<td>27%</td>
</tr>
<tr>
<td>University of Technology, Sydney</td>
<td>2,005</td>
<td>18,278</td>
<td>11%</td>
</tr>
<tr>
<td>University of Western Sydney</td>
<td>7,499</td>
<td>30,831</td>
<td>24%</td>
</tr>
<tr>
<td>University of Wollongong</td>
<td>2,941</td>
<td>13,772</td>
<td>21%</td>
</tr>
<tr>
<td><strong>Victoria</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Deakin University</td>
<td>3,149</td>
<td>25,269</td>
<td>12%</td>
</tr>
<tr>
<td>La Trobe University</td>
<td>3,870</td>
<td>20,377</td>
<td>19%</td>
</tr>
<tr>
<td>MCD University of Divinity</td>
<td>92</td>
<td>633</td>
<td>15%</td>
</tr>
<tr>
<td>Monash University</td>
<td>3,418</td>
<td>29,200</td>
<td>12%</td>
</tr>
<tr>
<td>RMIT University</td>
<td>2,905</td>
<td>20,441</td>
<td>14%</td>
</tr>
<tr>
<td>Swinburne University of Technology</td>
<td>1,809</td>
<td>14,038</td>
<td>13%</td>
</tr>
<tr>
<td>The University of Melbourne</td>
<td>1,534</td>
<td>18,158</td>
<td>8%</td>
</tr>
<tr>
<td>University of Ballarat</td>
<td>1,075</td>
<td>4,835</td>
<td>22%</td>
</tr>
<tr>
<td>Victoria University</td>
<td>2,861</td>
<td>14,839</td>
<td>19%</td>
</tr>
<tr>
<td><strong>Queensland</strong></td>
<td></td>
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<td></td>
</tr>
<tr>
<td>Bond University</td>
<td>220</td>
<td>2,798</td>
<td>8%</td>
</tr>
<tr>
<td>Central Queensland University</td>
<td>5,067</td>
<td>9,554</td>
<td>53%</td>
</tr>
<tr>
<td>Griffith University</td>
<td>3,783</td>
<td>25,501</td>
<td>15%</td>
</tr>
<tr>
<td>James Cook University</td>
<td>2,961</td>
<td>11,527</td>
<td>26%</td>
</tr>
<tr>
<td>Queensland University of Technology</td>
<td>3,848</td>
<td>29,319</td>
<td>13%</td>
</tr>
<tr>
<td>The University of Queensland</td>
<td>4,033</td>
<td>27,406</td>
<td>15%</td>
</tr>
<tr>
<td>University of Southern Queensland</td>
<td>4,933</td>
<td>14,428</td>
<td>34%</td>
</tr>
<tr>
<td>University of the Sunshine Coast</td>
<td>1,029</td>
<td>6,884</td>
<td>15%</td>
</tr>
<tr>
<td><strong>Western Australia</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Curtin University of Technology</td>
<td>3,405</td>
<td>22,514</td>
<td>15%</td>
</tr>
<tr>
<td>Edith Cowan University</td>
<td>2,314</td>
<td>16,302</td>
<td>14%</td>
</tr>
<tr>
<td>Murdoch University</td>
<td>2,422</td>
<td>10,779</td>
<td>22%</td>
</tr>
<tr>
<td>The University of Notre Dame Australia</td>
<td>721</td>
<td>8,042</td>
<td>9%</td>
</tr>
<tr>
<td>The University of Western Australia</td>
<td>1,176</td>
<td>15,636</td>
<td>8%</td>
</tr>
<tr>
<td><strong>South Australia</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Flinders University of South Australia</td>
<td>2,891</td>
<td>12,088</td>
<td>24%</td>
</tr>
<tr>
<td>The University of Adelaide</td>
<td>2,240</td>
<td>14,331</td>
<td>16%</td>
</tr>
<tr>
<td>University of South Australia</td>
<td>4,929</td>
<td>18,750</td>
<td>26%</td>
</tr>
<tr>
<td><strong>Tasmania</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>University of Tasmania</td>
<td>4,491</td>
<td>14,990</td>
<td>30%</td>
</tr>
<tr>
<td><strong>Northern Territory</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Charles Darwin University</td>
<td>1,073</td>
<td>5,609</td>
<td>19%</td>
</tr>
<tr>
<td><strong>Australian Capital Territory</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>The Australian National University</td>
<td>326</td>
<td>7,906</td>
<td>4%</td>
</tr>
<tr>
<td>University of Canberra</td>
<td>660</td>
<td>9,235</td>
<td>7%</td>
</tr>
<tr>
<td><strong>Multi-State</strong></td>
<td></td>
<td></td>
<td></td>
</tr>
<tr>
<td>Australian Catholic University</td>
<td>1,919</td>
<td>15,798</td>
<td>12%</td>
</tr>
<tr>
<td><strong>TOTAL</strong></td>
<td><strong>110,683</strong></td>
<td><strong>645,907</strong></td>
<td><strong>17%</strong></td>
</tr>
</tbody>
</table>

Source: Department of Education, Higher Education Student Data Collection, Appendix 2 - Equity Groups, Table 2.6

Note: Low SES is determined based on the students' postcode of permanent home residence, with the SES value derived from the 2011 SEIFA Education and Occupation Index for postal areas, where postal areas in the bottom 25% of the population aged 15-64 being classified as Low SES.