



INDEPENDENT
HIGHER EDUCATION
AUSTRALIA

IHEA SUBMISSION

COMMONWEALTH GOVERNMENT COVID–19 RESPONSE INQUIRY

14 December 2023

IHEA Submission

Commonwealth Government COVID–19 Response Inquiry

Independent Higher Education Australia (IHEA) welcomes the opportunity from the Australian Government to provide a submission – through the Department of Prime Minister and Cabinet – to the independent inquiry into Australia's response to the COVID–19. The Inquiry was announced on 21 September 2023 and is being led by an expert panel of Ms Robyn Kruk AO, Professor Catherine Bennett and Dr Angela Jackson.

Who We Are

IHEA is the peak body that represents Australian independent (private sector) higher education institutions. Our membership spans independent universities, university colleges and other institutes of higher education all of which are registered higher education providers accredited by the national higher education regulator, TEQSA or associate members seeking registration. Our Vision is that: students, domestic and international, have open and equitable access to world class independent higher education in Australia, built on the foundations of equity, choice, and diversity. IHEA members teach 74 percent of the students in the independent sector (i.e., more than 130,000 students).

Introduction

The COVID–19 pandemic was an unprecedented global event that brought life as we knew it to a standstill and tested our level of preparedness and resilience to deal with such a fast–evolving crisis. Independent Higher Education Australia (IHEA) welcomes the opportunity to reflect on the pandemic and to provide feedback on the actions that averted greater crises as well as what could be considered as part of a preparing for, and responding to, any future pandemic.

Response of IHEA and Independent Providers

Approximately three in four higher education providers that IHEA represent are based in New South Wales (~53 per cent) and Victoria (~23 per cent). Social distancing and then hard lockdowns were a necessary response to protect the health and safety of Australians and to prevent the spread of COVID–19. However, the impact and disruption caused by lockdowns – particularly in Victoria – significantly impacted providers and students.

In response, IHEA and member providers collaborated to share knowledge, contribute solutions to emerging issues and remained focused on the wellbeing of students. IHEA pivoted to working from home arrangements to ensure continuity of service and support. Weekly Zoom meetings were held with Chief Executive Officers of higher education providers to ensure they had up to date information about arrangements from Commonwealth and State and Territory governments. This included speakers and advice about education, health, policing, immigration, work safety, security, privacy, industrial relations and aviation. This was supplemented by IHEA seeking expert legal advice from Minter Ellison to produce a guide for members on the requirements of re–opening campus and the different regulations based on legislation in each jurisdiction.

Responses of Government

Increased interactions through stakeholder meetings with the Department of Education and the Tertiary Education Quality and Standards Agency were a necessary feature of managing the iterative changes in response to COVID–19. These meetings were critical for receiving updates and understanding and implementing the Government's response. However, this was not without a significant call on IHEA and their members' time and resources. The very nature of adapting a response to an unexpected event such as the pandemic meant that stakeholders effectively needed to be on call to respond at a moment's notice.

In terms of the actual responses, there were a number of elements that worked well for independent higher education providers, which we would advocate for as part of any future pandemic response. Some, such as the extension of Commonwealth Supported Places and the pause on the loan fee for FEE–HELP students are policies we think should be adopted permanently and for which we have advocated this position through the Australian Universities Accord process being run through the Department of Education. However, we think a more holistic approach to preparedness and response and communication about updates be coordinated and centralised. IHEA is also of the view that more could be done to support international students, who are critical to the Australian education system and the economy.

JobKeeper

Under JobKeeper, businesses were able to receive a payment of \$1,500 per fortnight per eligible employee to support the retention of people they employed if their business had an aggregated turnover of less than \$1 billion (for income tax purposes) and estimated that their GST turnover had fallen or was likely to fall by 30 per cent or more. While all IHEA members fell within this turnover threshold, some did access the JobKeeper subsidy based on the impact on their business. Those who did access the subsidy were able to keep staff employed and subsequently continue to educate students. Further, IHEA supported the extension of JobKeeper to Table B universities, who operate without reliance on Commonwealth funding, as it ensured that IHEA's larger independent university members were also able to keep staff employed.

Recommendation: Measures such as JobKeeper should be activated to support independent higher education providers that require the support as part of any response to a future pandemic or crisis.

FEE–HELP Loan Fee Exemption

The Higher Education Relief Package included a short–term exemption on the then 25% FEE–HELP Loan Fee that was applied to students at independent higher education providers who access HELP support. The measure was welcomed by the sector, as it gave students an opportunity to avoid accruing additional debt while studying, simply for making the choice to do so at an independent provider. The loan fee exemption was applied from 1 April 2020 until 31 December 2022, with the loan fee subsequently reduced to 20 per cent from 1 January 2023.

Recommendation: Measures such as FEE–Help loan fee exemption was an important and necessary support and should be called upon again in the future, if not instituted as a permanent measure to remove education barriers and innovation in the sector and to support the principles of competitive neutrality.

Access to Commonwealth Supported Places

The rollout of the Higher Education Relief Package during COVID–19 included the funding of 20,000 Commonwealth Supported Places (CSPs) for short courses across the higher education sector, with 1,000 places at independent providers funded through a \$7 million allocation. The program was well supported by the sector, with applications submitted for the funding of 4,500 places by independent providers. This greatly exceeded the 1,000 places being allocated.

The funding of six–month short courses created opportunities for employment for students and long–term benefit to the economy. This was a very positive and productive response to the crisis by government. The most important aspect of the short course proposal was agreement by the Commonwealth and States to include the undergraduate short course qualification in the Australian Qualifications Framework (AQF) as an 'Undergraduate Certificate' provided students with the opportunity to complete a nationally recognised qualification in a short period of time that can provide relevant, industry–specific skills. They also support the ability of people to be lifelong learners and access necessary upskilling and reskilling to achieve their objectives and ensure they are competitive in an evolving job market.

Recommendation: IHEA recommends that expanding CSP eligibility to all registered higher education providers would increase contestability for students in national priority spaces and open student choice to select the provider they deem most able to meet their educational and career needs.

International Education

COVID–19 travel restrictions had an immediate impact on student visa holders, many of whom were outside the country when restrictions were introduced. Despite a regulatory response allowing students to continue studying from outside Australia, many faced barriers to taking up this option, and instead deferred or cancelled their studies. However, COVID crises management by the Australian and State and Territory governments did lead to Australia being highly regarded internationally for its handling of the crisis and preventing the spread of the virus. Arising from this, Australia will benefit through recognition by international students and their families that we are a safe destination.

While the Australian Government's fiscal stimulus packages were supported businesses, households and workers and the \$18 billion higher education COVID–19 support package focused on domestic issues and students, none

of these packages contained provisions specific to international education and international students. In fact, visitors in Australia, including international students, were encouraged to return home given Australia was focussed on its citizens and its residents. Given the importance of international education, provide appropriate support to international students and acknowledge the contribution students make to the education sector and the Australian economy. Given the inward focussed response to the pandemic, there is a risk of the general community not caring about the plight of international students, nor being aware of the significant contribution they make.

IHEA is of the view that a key learning from the previous pandemic – to best prepare for any subsequent crisis – is to be proactive and prepared. While a number of measures worked after the fact, they were ad hoc and on the run. In the case of international students, this meant significant work to resume the entry of students to Australia, when we believe keeping the students in Australia with better support would have been a more practical approach. It would also have ensured that these students were able to work and assist in addressing emerging skills shortages that ensued.

Recommendation: In any future pandemic, the Australian Government should extend welfare support to international students experiencing financial hardship. This could be in the form of national emergency funding through scholarships for international students' accommodation and food as well as ensuring appropriate access to medical services. It is recommended that all Australian governments support public campaigns to explain the contribution of international education to the economy and the creation of jobs for Australian workers.

Crisis Planning and Preparedness

Crises, such as the COVID–19 pandemic, highlight any shortfalls in planning and decisiveness, especially in the context of a plethora of changing directives. For higher education providers, some were able to transition to online learning smoothly, while others faced challenges in terms of technology, pedagogy, and student engagement.

As part of any consideration for a future pandemic or national crisis, it will be important to undertake planning in advance as well as to understand the complexities of delivery modes, maintaining and meeting specific regulatory requirements, provisions for international students, and accessibility of services. Advance planning will enable the development of a preparedness, response and recovery strategy for the higher education sector, with communication at the forefront of managing the flow of accurate information. While the COVID–19 pandemic came as a surprise we have the opportunity to learn from the experience and put in place arrangements.

Augmenting what IHEA and their members were able to achieve should to a national level of be the ambition to ensure there are strategies to support students and help them learn during the crisis, such as providing clear and frequent communication, fostering a sense of community, and promoting well-being.

Recommendation: IHEA recommends that a business continuity plan be developed by the Department of Education in consultation with higher education providers to prepare for any significant crisis or pandemic. This should include the formulation of a response and recovery strategy. Further, a national platform should be established that collects and disseminates best practices, guidelines, and resources from various sources, such as government agencies, health authorities, higher education associations, and research institutions.

Sustainability of Online Delivery

The onset of the COVID–19 pandemic triggered an immediate and total transition to offsite, mainly online, learning. Many higher education providers were forced into remote delivery in order to survive without an opportunity to plan or budget for this transition. While many providers were able to implement remote environments to meet the immediate needs of students, significant investment is required to continue to deliver online education through high-quality platforms. With an expected changing student demand for online delivery, IHEA proposes that the government enables broader sector access to these online platforms, enabling open access for education consumers to publicly funded channels for the delivery of education services.

Recommendation: IHEA recommends for government support – including grants for providers – to support the development of necessary infrastructure and staff training to switch to online delivery. This will ensure the development of high-quality online learning environments and improved educational opportunities for domestic and international students.

Appendix: Terms of Reference

The purpose of the Commonwealth Government COVID–19 Response Inquiry is to identify lessons learned to improve Australia’s preparedness for future pandemics.

Scope

The Inquiry will review the Commonwealth Government’s response to the COVID–19 pandemic and make recommendations to improve response measures in the event of future pandemics. It will consider opportunities for systems to more effectively anticipate, adapt and respond to pandemics in areas of Commonwealth Government responsibility.

The Inquiry will adopt a whole–of–government view in recognition of the wide–ranging impacts of COVID–19 across portfolios and the community. Specific areas of review may include, but are not limited to:

- Governance including the role of the Commonwealth Government, responsibilities of state and territory governments, national governance mechanisms (such as National Cabinet, the National Coordination Mechanism and the Australian Health Protection Principal Committee) and advisory bodies supporting responses to COVID–19.
- Key health response measures (for example across COVID–19 vaccinations and treatments, key medical supplies such as personal protective equipment, quarantine facilities, and public health messaging).
- Broader health supports for people impacted by COVID–19 and/or lockdowns (for example mental health and suicide prevention supports, and access to screening and other preventive health measures).
- International policies to support Australians at home and abroad (including with regard to international border closures, and securing vaccine supply deals with international partners for domestic use in Australia).
- Support for industry and businesses (for example responding to supply chain and transport issues, addressing labour shortages, and support for specific industries).
- Financial support for individuals (including income support payments).
- Community supports (across early childhood education and care, higher education, housing and homelessness measures, family and domestic violence measures in areas of Commonwealth Government responsibility).
- Mechanisms to better target future responses to the needs of particular populations (including across genders, age groups, socio–economic status, geographic location, people with disability, First Nations peoples and communities and people from culturally and linguistically diverse communities).

The Inquiry will consider the findings of previous relevant inquiries and reviews and identify knowledge gaps for further investigation. It will also consider the global experience and lessons learnt from other countries in order to improve response measures in the event of future global pandemics.

The following areas are not in scope for the Inquiry:

- Actions taken unilaterally by state and territory governments.
- International programs and activities assisting foreign countries.

Submissions are due by 11.59PM AEDT on Friday 15 December 2023.