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Tuesday 3 September 2024

Committee Secretary
Senate Education and Employment Committee
Department of the Senate
PO Box 6100
Parliament House
Canberra ACT 2600

Dear Committee Secretary,

Re: Universities Accord (Student Support and Other Measures) Bill 2024.

Navitas Professional Institute Pty Ltd, trading as the Australian College of Applied Professions (ACAP), welcomes the opportunity to provide a submission to inform the Senate Education and Employment Committee's consideration of the *Universities Accord (student Support and Other Measures) Bill 2024*, a Bill for an Act to amend the *Higher Education Support Act 2003*.

ACAP has been operating for over 40 years and recently became a University College, distinguishing it as a high quality provider specialising in the delivery of human services education to almost 5000 students annually, across six Australian campuses and online.

Our submission relates to the following relevant Schedules of this Bill:

- Schedule 1 – HELP indexation
- Schedule 2 – SSAF changes
- Schedule 4 – Commonwealth Prac Payments

SCHEDULE 1 -- HELP Indexation

ACAP and our parent company Navitas welcome the proposed amendments to the way HECS and HELP loans are indexed by the ATO from CPI to the lower of CPI or WPI. We believe this change would benefit all students equally, and we support the proposal.

SCHEDULE 2 -- SSAF Changes

ACAP supports the principles and proposals in the Bill relating to changes to the Student Services and Amenities Fee (SSAF). At ACAP, and our Navitas stablemate SAE University College, we implemented the SSAF in 2024 and would support legislation that requires at least 40% of the SSAF to be allocated to student-led organisations. We have already begun discussions about how we could most effectively implement this, and we fully support any such initiative that provides more opportunity for students to have a voice in the decision making about the delivery of their education.

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SCHEDULE 3 – Commonwealth Prac Payment (CPP)

At ACAP and our parent company Navitas, we not only applaud this excellent initiative, but also fully endorse it, having advocated for some time for this type of support for students studying in these vital human services areas. However, ACAP is seeking to ensure our students are eligible for this CPP.

Many students struggle with costs of living when undertaking practical placements, particularly when required to forego work opportunities to attend placements. At ACAP, many of our students are from lower socio-economic backgrounds and more than one-fifth are first in family to undertake a degree. Of those, we currently have 218 Australian domestic students studying social work (Bachelor and/or Masters, qualifying) at our Sydney and Melbourne campuses, and the majority of whom are female – many are mothers or caregivers. With 1000 hours of required industry work placement attached to their qualification, a Prac Payment would greatly assist with cost-of-living expenses while they are completing their education. Our students are a true reflection of the types of students your Prac Payment has been designed to support, and our submission seeks an assurance that they will be eligible.

Eligibility clarification

Under Section 41-10 of the Higher Education Support Act 2003, this Bill will add a 15th item for the purpose of CPP Grants, with eligibility for “Table A providers, *Table B providers and bodies corporate that are specified in the HESA Other Grants Guidelines for the purposes of this item”. ACAP would fall into the latter category of specified bodies corporate, enabling our students to access the CPP Grants.

However public statements by the Education Department about the CPP have previously indicated that entitlement to the CPP would be limited to students undertaking eligible courses from providers with Commonwealth Supported Places. This would exclude students from ACAP. There is no such mention of this in the Bill.

Ensuring equitable inclusion

ACAP is seeking to ensure Australian domestic ACAP students are eligible for the CPP. This can be assured by listing ACAP as one of the “specified bodies corporate” for this new item when the associated legislative instrument (Other Grants Guidelines) is updated on the passing of the Bill.

ACAP enrolls almost 100% of Australia’s domestic Social Work students outside Table A providers. A review of 2022 published data indicates a total of 171 students (EFTSL) enrolled in a Social Work course with non-Table A providers – ACAP enrolled 170 of these. With means testing applied, we estimate that approximately 80 Social Work students at ACAP will be severely disadvantaged by not being eligible for the CPP.

Students studying through ACAP experience the same financial pressures as students enrolled at Australian universities. After graduating to their profession, ACAP students make the same contribution to meeting skills shortages and addressing increasing community health demands as all Social Work graduates.

ACAP’s inclusion in the list of eligible providers will have a small impact on the fiscal demands of the scheme. It would also be consistent with the Minister’s commitment to equity and the reasons why the Australian Government has acted – that is to “relieve cost of living pressures for these students; and to invest in critical workforces”.

The inclusion of ACAP in the list of specified bodies corporate when the Other Grants Guidelines is updated for this new item would ensure the CPP scheme is available to these students.

RECOMMENDATION: That Navitas Professional Institute Pty Ltd, trading as the Australian College of Applied Professions (ACAP), is listed as a specified bodies corporate in the HESA Other Grants Guidelines for the purposes of the proposed 15th item Under Section 41-10 of the Higher Education Support Act 2003, for the *Universities Accord (student Support and Other Measures) Bill 2024*, enabling ACAP students to access the Commonwealth Prac Placement (CPP) Grants.