

15th November 2022

BY EMAIL: exemptions@accc.gov.au

General Manager
Competition Exemptions
Australian Competition and Consumer Commission
GPO Box 3131
Canberra ACT 2601

Dear Sir/Madam

Collective bargaining notification: The National Copyright Unit on behalf of the Copyright Advisory Group for TAFEs

Notifying Party

1. Provide details of the notifying party

1.1 Name, address (registered office), telephone number, and ACN

The National Copyright Unit (**NCU**), which sits within the NSW Department of Education, on behalf of the Copyright Advisory Group for TAFEs (**CAG TAFE**), comprised of the TAFE entities which are currently CAG TAFE members, and Victorian TAFEs as referred to in response to question 15 and other TAFE entities who may elect to join the collective bargaining process in future (together, the **Notifying Parties**).

Details	
Address (registered office)	Level 7, 105 Phillip Street, Parramatta NSW 2150
Telephone number	[REDACTED]
ACN	40 300 173 822

1.2 Contact person's name, telephone number, and email address

Relevant contact	
Name	[REDACTED]
Position	[REDACTED]
Telephone number	[REDACTED]
Email address	[REDACTED]

1.3 A description of business activities

NCU is a specialist copyright team that sits within the NSW Department of Education but reports to and supports the Copyright Advisory Group for schools (**CAG Schools**) and CAG TAFE. Acting on behalf of CAG Schools and CAG TAFE, NCU is responsible nationally for

copyright policy and administration for Australian schools and technical and further education institutions (**TAFEs**).¹

CAG TAFE is comprised of senior representatives from TAFE providers and is responsible for copyright policy and administration for TAFE institutions across Australia (except Victoria), including in relation to arrangements under the statutory education licence which is provided for in section 113P of the *Copyright Act 1968* (Cth) (**Statutory Licence**). NCU's operations are funded by the State and Territory Departments of Education, the Catholic and Independent school sectors, and TAFE (excluding Victoria). It operates on a triannual funding cycle which is agreed and approved by the Australian Education Senior Officials Committee, the National Catholic Education Commission, Independent Schools Australia and the TAFE jurisdictions.

NCU's primary responsibilities include the following:

- (a) negotiating and managing statutory and voluntary licences with collecting societies;
- (b) liaising across the education sector and industry bodies on copyright policy issues;
- (c) preparing submissions to government inquiries on educational copyright issues; and
- (d) providing specialist copyright advice to jurisdictions on copyright issues affecting TAFE.

Victorian TAFEs are represented collectively for copyright purposes, but operate separately from CAG TAFE.

The business activities of TAFE institutions is described in response to question 6 below.

1.4 Email address for service of documents in Australia

[REDACTED]

Details of the notified conduct

2. Indicate what the notified conduct is for

The notified conduct is for collective bargaining under section 93AB of the *Competition and Consumer Act 2010* (Cth) (**CCA**). The notified conduct does not include a collective boycott.

3. Provide details of the notified conduct including:

3.1 A description of the notified conduct

Relevant background

Standards are voluntary documents that cover a variety of subjects and set out specifications, procedures and guidelines aimed at ensuring that products, services, and systems are safe, consistent, and reliable. While there is no requirement for businesses to comply with voluntary standards, the Commonwealth, State and Territory governments regularly refer to standards in legislation. For example, voluntary standards can form the basis for mandatory safety standards published by the Commonwealth Minister under to s 104 of the *Australian Consumer Law*.² Standards are also afforded status under the CCA. In particular, certain provisions do not apply in relation to arrangements regarding standards prepared or approved by Standards Australia.³

¹ See here: <https://smartcopying.edu.au/about-us/>

² See, for example, the mandatory standard regarding design and labelling requirements for child and adult pedal bicycles under the *Consumer Protection Notice No. 6 of 2004* which incorporates, subject to some amendments, *AS/NZS 1927: 1998 Pedal bicycles* — Safety requirements published by Standards Australia/Standards New Zealand on 5 September 1998.

³ See CCA, s 51(2)(c).

Efficient and equitable access to Australian Standards is a necessary resource in order to educate students, apprentices and junior tradespeople. Educational providers such as TAFEs regularly refer to standards in the course of providing educational services to students and, in particular, in learning materials prepared by academic staff members for students. For example:

- (a) In TAFE Queensland, Standards were accessed on more than [REDACTED] occasions in 2020.
- (b) TAFE NSW estimates that [REDACTED] of their students use Standards during the course of their studies.

TAFEs rely on Standards to ensure that students are aware of and able to comply with standards both during the course of their studies and in their post-qualification work. A sound understanding of the Standards which are relevant to a student's particular areas of study is an essential learning outcome for TAFEs. Standards are mandated in some TAFE training packages, and assessment requirements stated in units of competency require students to access and refer to the Standards. The use of Standards is one of the most important ways in which knowledge is transferred to students in a particular sector.

TAFEs use a wide range of Standards. For example:

- (a) A WA TAFE has advised that its students accessed around [REDACTED] different Standards in 2019;
- (b) Students and academic staff at Canberra Institute of Technology accessed more than [REDACTED] different Standards in 2020;
- (c) For TAFE NSW and TAFE Queensland, the most commonly used Standard is AS/NZS 3000:2018, *Electrical installations*, which is sometimes referred to as the Wiring Rules. In respect of TAFE Queensland, the Wiring Rules were accessed [REDACTED] occasions during the course of 2021. The Wiring Rules are the technical rules which are used by electricians to design and construct electrical installations. The Wiring Rules are important in training future electricians, as well as to the safety and security of the broader Australian community by shaping minimum regulatory standards.

The most common Standards are in the trade area, and it is essential that students studying courses such as those in the building, construction and property fields are familiar with relevant Australian Standards. [REDACTED]

Standards Australia Limited (ABN 85 087 326 690) (**Standards Australia**) is a not-for-profit public company limited by guarantee which is registered with the Australian Charities and Not-for-profits Commission. Standards Australia evolved from the Standards Association of Australia, a body incorporated by Royal Charter in 1950. The principal object of Standards Australia is to prepare and maintain standards at the national and international level and to promote the general adoption of standards.

The Commonwealth recognises Standards Australia as the peak non-government standards body in Australia, and that any copyright in standards vests in Standards Australia.⁴ In effect, this means that Standards Australia is in a unique position in the development of national standards.

Standards Australia also represents Australia as a member of the International Organization for Standardization (ISO), and as part of other international standards-related bodies.

⁴ See the Memorandum of Understanding between the Commonwealth (through the Department of Industry, Innovation and Science) and Standards Australia Limited, dated 13 November 2018.

Standards developed by Standards Australia are made available for purchase either:

- (a) online via Standards Australia's own 'Standards Store'; or
- (b) via one of Standards Australia's distribution partners.

There are two key third party distributors that provide access to Standards Australia's products including via online stores, being SAI Global Australia Pty Ltd (ABN 14 144 974 08) (**SAI Global**) and Techstreet LLC (**Techstreet**) (the **Distributors**). The Notifying Parties intend to negotiate with Standards Australia, SAI Global and Techstreet.

For completeness, the Notifying Parties understand that Standards Australia also distributes products via three specialist providers – FireMate, the Housing Industry Association (**HIA**) and the NSW Master Builders Association through its platform, myBIG. The Notifying Parties do not intend to negotiate collectively with HIA or the NSW Master Builders Association.

TAFEs typically negotiate licence agreements for access to Standards with either SAI Global or Techstreet, by first going out to tender or requesting a pricing submission from both Distributors. If a TAFE requires an extracts or PDF licence for use in its Learning Management System (**LMS**), they have previously acquired this directly from Standards Australia. An extracts or PDF licence is one which allows TAFEs to extract part of a Standard or obtain the Standard in a PDF format to use in the LMS (as opposed to accessing via the subscription from the distributor).

In addition to price, terms that are regularly negotiated between each TAFE and SA / the Distributors include:

- (a) the number of TAFE sites;
- (b) the number of simultaneous users permitted to access Standards;
- (c) the number of Standards selected;
- (d) whether international Standards are included;
- (e) the term of the licence;
- (f) the number of times that a Standard can be downloaded;
- (g) the amount of time for which a downloaded copy of a Standard can be accessed;
- (h) the ability to access Standards remotely;
- (i) the ability to integrate Standards (or extracts) into educational products or the respective TAFEs' LMS;
- (j) the right for TAFE staff and students to print Standards using third party printers (printing is vital as students often need to print and continually reference the Standards, and students, particularly in remote areas, may not have access to the internet).

The notified conduct

The Notifying Parties intend to:

- (a) negotiate with Standards Australia and / or the Distributors (as relevant) a fit for purpose licence or licence terms for the use of standards in TAFE institutions; and
- (b) authorise NCU to represent the Notifying Parties in the event of any dispute resolution process with Standards Australia and/or the Distributors (the **Notified Conduct**).

Although CAG TAFE is not responsible for copyright policy and administration for Victorian TAFEs, CAG TAFE and Victorian TAFEs intend to negotiate together for the purposes of the Notified Conduct.

The primary goal of negotiations related to the Notified Conduct is to facilitate access to standards on consistent terms for all TAFEs to ensure equitable and consistent terms and pricing which is suited to the needs of TAFE institutions. The Notifying Parties consider that although there is an overarching need for consistency and commonality regarding core terms, there may be some need for different licence options for individual TAFEs to select from. It may be necessary for a licence to account for the particular needs of an individual TAFE in relation to, for example, access to international standards.

Notwithstanding any minor variations, the Notifying Parties are seeking through collective negotiations to achieve consistency in relation to key terms which will deliver benefits through licensing arrangements that are fit for purpose and reflect the particular needs of the TAFE sector. The Notifying Parties expect that collective bargaining will produce a more efficient negotiation process and therefore minimise costs. The intent is that collective bargaining will reduce the need for parties to raise the same issues individually with the Distributors.

Participation in the Notified Conduct by a Notifying Party is voluntary and subject to the discretion of each individual TAFE. Any Notifying Party that does not wish to participate in the Notified Conduct may negotiate with Standards Australia and / or the Distributors individually, and may also cease to participate in the Notified Conduct at any time.

3.2 Any relevant documents detailing the terms of the notified conduct

Not applicable.

3.3 The rationale for the Notified Conduct

The price and terms on which standards are made available by Standards Australia and the Distributors differs based on a number of factors, including the number of sites, the licence term, simultaneous user requirements, the particular standards selected and whether international standards are included.

Most TAFEs have different agreements with the Distributors to access standards. However, there are a number of issues with those agreements, including:

- (a) the pricing of standards and concerns that they vary significantly among TAFEs (ie. that TAFEs may be charged different fees for the same rights / access arrangements);
- (b) the scope of rights granted is not sufficient or fit for purpose for TAFEs; and
- (c) digital rights management systems have been implemented which mean that TAFEs are unable to make use of standards in the way they require or may otherwise be able to make under the Statutory Licence and other exceptions in the *Copyright Act 1968* (Cth).

The collective nature of the Notified Conduct is expected to address these concerns in a streamlined manner with the aim of designing a fit for purpose license for use of standards in TAFEs. Together, the Notifying Parties will have greater bargaining power, and may be able to achieve lower licence fees and more favourable licence terms, than if they were to negotiate with Standards Australia and / or the Distributors separately. There is a significant asymmetry in bargaining power in circumstances where Standards Australia is the principal source of standards in Australia, and where those standards are, in effect, an essential input for TAFEs.

The Notified Conduct is intended to address to some extent that imbalance in bargaining power. In the absence of the Notified Conduct, individual TAFEs would not be, and have not been, able to effectively negotiate a fit for purpose licence with Standards Australia in a fair, transparent and equitable manner.

3.4 Any time period relevant to the notified conduct

Given the term of any licence agreement that will result from the Notified Conduct is not yet defined, it is possible that the Notifying Parties may need to negotiate a new licence agreement in the short to medium term. Accordingly, the Notifying Parties wish to notify the conduct for a period of up to 10 years to ensure that negotiations can be facilitated in an effective manner.

4. **Provide documents submitted to the notifying party's board or prepared by or for the notifying party's senior management for purposes of assessing or making a decision in relation to notified conduct and any minutes or record of the decision made.**

Not applicable.

5. **Provide the names and/or a description of the persons or classes of persons who may be directly impacted by the notified conduct (including targets in collective bargaining or boycott conduct) and detail how or why they might be impacted.**

The 'target' in collective bargaining is Standards Australia and / or the Distributors (as relevant). As outlined above, Standards Australia is the sole body which enables institutions such as TAFEs to secure proper permissions for the use of standards through copyright licence agreements. In essence, Standards Australia has a virtual monopoly with respect to the provision of licences for standards in Australia. The objective is that the Notifying Parties will be able to achieve licence terms that are suitable for the industry as a result of the Notified Conduct.

All TAFEs in Australia will have the opportunity to benefit from the Notified Conduct, by virtue of having improved bargaining power in negotiations with Standards Australia and / or the Distributors. The intention is that collective negotiations may achieve more favourable and equitable licence terms than if TAFEs were to negotiate separately. The details of the TAFEs who currently intend to participate are provided in a separate annexure (**Annexure A**).

The TAFEs will, however, continue to be motivated to reach an agreement to access standards. As noted above, standards are, in essence, an essential input to the services that TAFEs offer.

Ultimately, TAFE students will also be positively impacted for the reasons set out in response to question 10. The objective of the Notified Conduct is to ensure that the licence terms agreed by the parties are fit for purpose which the Notifying Parties consider will improve the experience for TAFE staff and students.

Market information and concentration

6. **Describe the products and/or services supplied, and the geographic areas supplied, by the notifying parties. Identify all products and services in which two or more parties to the notified conduct overlap (compete with each other) or have a vertical relationship (eg supplier-customer).**

As described above, TAFE institutes operate in each Australian State and Territory. The table in **Annexure B** sets out the geographic areas of the current Notifying Parties.

CAG TAFE members are all established under separate State or Territory legislation.⁵

⁵ See, eg, TAFE NSW Act - [NSW legislation - Technical and Further Education Commission Act 1990 No 118](#).

Each TAFE is its respective State or Territory Government public provider of Vocational Education and Training (VET) services. Generally, the legislation of each State and Territory which governs TAFE provides each TAFE with functions similar to the following:

- (a) providing technical and further education services to meet the skills needs of individuals and the workforce, in ways that recognise the changing nature of workplaces and the need for new skills and retraining;
- (b) consulting with industry and the community to ensure technical and further education services are relevant to industry, business, students and other groups;
- (c) providing educationally or vocationally disadvantaged groups with access to technical and further education and other specialised services; and
- (d) providing students with the maximum opportunity to progress to further education and training by linking their studies to further TAFE courses or those of other education and training providers.

TAFEs generally compete in a fragmented and competitive sector with other suppliers of VET programs. In the ordinary course of business, TAFEs (as VET providers) act independently and operate at arms-length with a view to enrolling students to their respective institutions. With respect to the acquisition of Standards, each TAFE currently negotiates directly with a Distributor, and in some cases Standards Australia, in accordance with their general procurement processes.

Other products and services that TAFE routinely acquire include electronic resources library subscriptions e.g. eVideos, ebooks, eJournals etc, digital learning resources for delivery of training and assessment, print books and journal, and software licences..

7. Describe the relevant industry or industries. Where relevant, describe the sales process, the supply chains of any products or services involved, and the manufacturing process.

The industry relevant to the Notified Conduct is the national VET industry in which the Notifying Parties operate. As outlined above, TAFEs generally compete in a fragmented and competitive sector with other suppliers of VET programs.

With respect to the acquisition of standards, each TAFE currently negotiates directly with a Distributor, and in some cases Standards Australia (for example, if the TAFE is negotiating an extracts or PDF licence), in accordance with their general procurement processes.

8. In respect of the overlapping products and/or services identified, provide estimated market shares for each of the parties where readily available.

The VET sector consists of Commonwealth and state/territory government-funded training delivered by TAFEs, other government providers (such as universities), private providers and community education providers. In 2020, around 20% of VET training was delivered by TAFEs.

In relation to Standards, as noted above, Standards Australia is the principal Australian body involved in the development of Standards. Standards Australia is afforded particular status by the Australian government and Standards Australia acts as Australia's representative as part of a number of international standards forums. The Notifying Parties regard Standards Australia as effectively holding a monopoly position in relation to the development of Standards and their distribution through Standards Australia's network of Distributors.

Other major acquirers of standards include the library sector including national, state and public libraries, university libraries, government agencies, other registered training organisations, industry/employers, private enterprise organisations.

9. Describe the factors that would limit or prevent any ability for the parties involved to raise prices, reduce quality or choice, reduce innovation, or coordinate rather than compete vigorously. You should address:

9.1 Existing competitors

TAFEs generally compete in a fragmented and competitive sector with other suppliers of VET programs. That is, TAFEs compete with private and community training providers to access contestable government training funds, and in order to deliver courses and qualifications to meet the needs of students, industry and their respective State or Territory economy. There are approximately 4,000 registered training organisations currently in Australia which broadly fall into three main categories:

- (a) public providers who are funded by the government to provide subsidised training to a broad range of trainees (TAFE institutions);
- (b) larger, more established enterprise registered training organisations (privately owned, including those operated by individual companies); and
- (c) smaller private registered training organisations.

It is therefore clear that the Notifying Parties face, and will continue to face, vigorous competition from a large number of VET providers operating in Australia.

9.2 Likely entry by new competitors

Australia's VET sector operates primarily as a market-based system with relative ease of entry for private education providers (as evidenced by the large number of participants in the industry), subject to registration requirements provided for by the Australian Skills Quality Authority. Such requirements include demonstrating financial viability and payment of a registration charge.

The high number of VET providers operating in Australia suggests that barriers to entry are low.

9.3 Any countervailing power of customers and/or suppliers

Standards Australia has a virtual monopoly with respect to the provision of standards in Australia. Having regard to Standards Australia's dominant position, the conduct proposed by the Notifying Parties is unlikely to materially impact this power. By embarking on the Notified Conduct, the Notifying Parties hope to address, to some degree at least, the asymmetry in bargaining power in order to improve the terms of access to standards for TAFEs, and ultimately, for students.

9.4 Any other relevant factors.

The competitive constraints on the TAFEs will not change at all as a result of the Notified Conduct.

Public benefits

10. Describe the benefits to the public that are likely to result from the notified conduct. Provide information, data, documents or other evidence relevant to the ACCC's assessment of the public benefits.

The intention is that the Notified Conduct will generate a number of public benefits, including:

- (a) fairness and uniformity in access to standards for TAFE students across Australia, ensuring that students are not provided with inferior access to standards, and therefore educational experience, purely due to their geographical location;

- (b) greater uniformity in the terms on which TAFEs are able to access standards and, in particular, terms that are appropriate and adapted to the TAFE education environment;
- (c) ensuring that TAFEs are able to make use of standards in a manner that is consistent with the policy objectives underpinning the Statutory Licence and other exceptions relating to the use of copyright works in an educational context in the *Copyright Act 1968* (Cth) (**Copyright Act**). Certain provisions in the Copyright Act recognise that there is a public interest in allowing use of copyright materials in an educational context. However, the access arrangements imposed by Standards Australia on standards are inconsistent with these provisions. For example, as set out in paragraph 3.3(c), digital rights management systems have been implemented which mean that TAFEs are unable to make copies of the standards that they would otherwise be able to make under the Statutory Licence or other exceptions in the Copyright Act;
- (d) reduced transaction costs and greater efficiency of negotiations, as opposed to each TAFE negotiating directly with Standards Australia and / or the Distributors. As noted above, TAFEs typically release a tender or request a pricing submission from the Distributor. The time required as part of a tender and commercial negotiations can vary. [REDACTED] The Notifying Parties consider that collective bargaining will generate significant efficiencies;
- (e) improved bargaining power for the relevant Notifying Parties leading to greater efficiency in allocation of resources between them, as the Notifying Parties will be able to more effectively negotiate for the specific needs of members, including to ensure that licence terms are appropriately adapted to the needs of the education sector. This will include bargaining in respect of TAFEs in jurisdictions which have a limited number of campuses and smaller student population, which may otherwise be unable to negotiate terms and conditions that are equivalent to institutions in more populous jurisdictions. This is particularly so where Standards Australia is, in effect, a monopoly supplier in respect of standards in Australia (with no adequate substitutes for standards), and therefore can wield substantial bargaining power in negotiations; and
- (f) maintaining the ability of the Notifying Parties to negotiate terms specific to the requirements of each TAFE institution, depending on their individual needs.

The Notifying Parties consider that the Notified Conduct will improve efficiency and generate transaction cost savings, both for the Notifying Parties as well as Standards Australia and the Distributors. At present, Standards Australia and the Distributors must engage separately with institutions in the TAFE sector. The Notifying Parties consider that the Notified Conduct will avoid the time and cost of those bilateral negotiations, while also generating benefits through tailored licence terms that are designed to better reflect the requirements of the TAFE sector.

Public detriments

- 11. Describe any detriments to the public that are likely to result from the notified conduct, including those likely to result from any lessening of competition. Provide information, data, documents, or other evidence relevant to the ACCC's assessment of the detriments.**

The Notifying Parties do not foresee that the Notified Conduct will cause any detriment to the public for the following reasons:

- (a) participation by the Notifying Parties is voluntary, such that individual TAFEs maintain discretion to participate in the Notified Conduct or enter into agreements on negotiated terms, and may individually negotiate with Standards Australia and / or the Distributors should they wish to;
- (b) the Notified Conduct does not involve a collective boycott;

- (c) there remains a large number of VET providers in Australia that will continue to provide competition in the education sector, and so TAFE's competitive incentives will not be diminished;
- (d) customers other than the Notifying Parties will continue to deal separately with Standards Australia and / or the Distributors. The Notifying Parties expect that they represent a relatively small group of customers in respect of the supply and acquisition of standards. The Notified Conduct is unlikely to have a material impact on the business of Standards Australia and / or the Distributors.

Contact details of relevant market participants

12. Identify and/or provide contact details (phone number and email address) for likely interested parties, such as actual or potential competitors, customers and suppliers, trade or industry associations and regulators.

Name	Organisation	Phone number	Email address
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]
[REDACTED]	[REDACTED]	[REDACTED]	[REDACTED]

Any other information

13. Provide any other information you consider relevant to the ACCC's assessment of the notified conduct.

Not applicable.

Additional information for collective bargaining (with or without a collective boycott) conduct only

14. Confirm that the notifying party is not a trade union, an officer of a trade union or acting at the direction of a trade union.

The Notifying Parties are not a trade union, officer of a trade union or acting at the direction of a trade union.

15. Provide details (name, phone number, email address) of the persons who are current members of the group (contracting parties) on whose behalf the notification is lodged. If relevant, identify the classes of persons who may become contracting parties in the future and on whose behalf the notification is lodged.

The details of the parties who intend initially to participate in the collective negotiations are provided in a separate confidential annexure (Annexure A).

Other parties may join the collective bargaining process in the future.

16. Confirm each contracting party reasonably expects to make one or more contracts with the targets for the supply or acquisition of the relevant goods or services and the value of each contract will not exceed A\$3 million (or any other amount prescribed by regulation) in any 12 month period. Provide details of the basis for that expectation.

Each of the contracting parties reasonably expects that the value of the agreements for the acquisition of standards will not each exceed A\$3 million in any 12 month period. This expectation is based on past agreements entered with Standards Australia and / or the Distributors.

17. If the contracting parties propose to engage in a collective boycott with respect to the targets, provide details of:

17.1 The event/s that would trigger a collective boycott:

Not applicable.

Given that Standards Australia effectively constitutes a monopoly supplier for standards in Australia, and the standards in question are an essential input in the provision of VET with no adequate substitutes, the Notifying Parties are not in a position to collectively boycott.

17.2 The process that would be followed:

Not applicable.

17.3 Any proposed notice period to be given to the target/s prior to commencing a collective boycott:

Not applicable.

17.4 Any proposed dispute resolution procedure between the contracting parties and the targets:

Not applicable.

Declaration by notifying party

The undersigned declare that, to the best of their knowledge and belief, the information given in response to questions in this form is true, correct and complete, that complete copies of documents required by this form have been supplied, that all estimates are identified as such and are their best estimates of the underlying facts, and that all the opinions expressed are sincere.

The undersigned are aware of the provisions of sections 137.1 and 149.1 of the Criminal Code (Cth).

[Redacted signature]

Signature of authorised person

[Redacted office held]

Office held

[Redacted name]

(Print) Name of authorised person

This 15th day of November 2022

Annexure A

Name	TAFE entity	Phone number	Email address
[REDACTED]	TAFE Queensland	[REDACTED]	[REDACTED]
[REDACTED]	TAFE South Australia	[REDACTED]	[REDACTED]
[REDACTED]	TAFE NSW	[REDACTED]	[REDACTED]
[REDACTED]	Canberra Institute of Technology	[REDACTED]	[REDACTED]
[REDACTED]	TasTAFE	[REDACTED]	[REDACTED]
[REDACTED]	Batchelor Institute - NT	[REDACTED]	[REDACTED]
[REDACTED]	Govt of WA Dept of Training and Workforce Development	[REDACTED]	[REDACTED]
	North Metropolitan TAFE, WA		
	South Metropolitan TAFE, WA		
	Central Regional TAFE, WA		
	South Regional TAFE, WA		
	North Regional, WA		
[REDACTED]	Victorian TAFEs	[REDACTED]	[REDACTED]
	Bendigo TAFE, Vic		
	Box Hill Institute, Vic		
	Chisholm Institute, Vic		
	Federation University Australia, Vic		
	Goulburn Ovens Institute of TAFE, Vic		
	Holmesglen Institute, Vic		

	Kangan Institute, Vic
	Melbourne Polytechnic, Vic
	RMIT University, Vic
	South West Institute of TAFE, Vic
	Sunraysia Institute of TAFE, Vic
	Swinburn University of Technology, Vic
	TAFE Gippsland (Federation Training), Vic
	Gordon Institute of TAFE, Vic
	Victoria University Polytechnic, Vic
	William Angliss Institute, Vic
	Wodonga TAFE, Vic

Annexure B

TAFE Entity	Geographic region	Specific campuses			
TAFE Queensland	Queensland	Ashmore	Loganlea	Great Barrier Reef International	Whitsundays
		Coolangatta	Mt Gravatt	Marine College	Bundaberg
		Coomera	Redcliffe	Innisfail	Gympie
		Coomera Marine	South Bank	Northern Peninsula Area	Hervey Bay
		Southport	Springfield	Thursday Island	Kingaroy
		Robina	Charleville	Bowen	Maryborough
		Acacia Ridge	Chinchilla	Burdekin	Nurunderi
		Alexandra Hills	Dalby	Charters Towers	Mooloolaba
		Bracken Ridge	Roma	Cloncurry	Nambour
		Caboolture	Toowoomba	Ingham	Sunshine Coast Health Institute
		Eagle Farm	Warwick	Mount Isa	Maroochydore
		Grovely	Lockyer Valley (Gatton)	Normanton	Browns Plains
		Inala	Cairns	Palm Island	Townsville (Bohle)
		Ipswich	Atherton	Townsville (Pimlico)	
TAFE New South Wales	New South Wales	Digital Campus	Coonabarabran	Ryde	St George
		Belmont	Glen Innes	St Leonards	Ultimo
		Cessnock	Gunnedah	Albury	Bathurst
		Glendale	Inverell	Cootamundra	Bourke
		Gosford	Moree	Corowa	Brewarrina
		Hamilton	Narrabri	Deniliquin	Broken Hill
		Hunter Street	Quirindi	Finley	Coomealla
		Kurri Kurri	Tamworth	Griffith	Cobar
		Maitland	Tenterfield	Hay	Condobolin
		Muswellbrook	Ballina	Lake Cargelligo	Coonamble
		Newcastle	Casino	Leeton	Cowra
		Ourimbah	Coffs Harbour	Narrandera	Dubbo
		Scone	Coffs Harbour Education CHEC	National Environment Centre	Dunedoo
		Singleton	Grafton	Primary Industries Centre	Forbes
Tomaree	Great Lakes	Temora	Gilgandra		

TAFE Entity	Geographic region	Specific campuses			
		Wyong	Kempsey	Tumut	Grenfell
		Bega	Kingscliff	Wagga Wagga	Lightning Ridge
		Batemans Bay	Lismore	West Wyalong	Lithgow
		Cooma	Macksville	Young	Menindee
		Goulburn	Macleay	Bankstown	Mudgee
		Moruya	Murwillumbah	Campbelltown	Nyngan
		Moss Vale	Nambucca Heads	Granville	Blacktown
		Nowra	Port Macquarie	Lidcombe	Blue Mountains - Katoomba
		Queanbeyan	Taree	Liverpool	Blue Mountains - Wentworth Falls
		Shellharbour	Trenayr	Macquarie Fields	Mount Druitt
		Ulladulla	Wauchope	Miller	Nirimba
		Wollongong	Wollongbar	Padstow	Nepean - Penrith
		Wollongong West	Yamba	Wetherill Park	Nepean - Kingswood
		Yallah	Bradfield	Design Centre Enmore	Richmond
		Yass	Hornsby	Loftus	The Hills - Baulkham Hills
		Armidale	Meadowbank	Petersham	The Hills - Castle Hill
		Boggabilla	Northern Beaches	Randwick	
Canberra Institute of Technology	Australian Capital Territory	CIT Bruce			
		CIT Fyshwick			
		CIT Gungahlin			
		CIT Reid			
		CIT Tuggeranong			
TAFE Tasmania	Tasmania	Alanvale			
		Campbell Street			
		Burnie			
		Devonport			
		Clarence			
		Drysdale (Launceston)			
		Drysdale (Hobart)			
TAFE South Australia	South Australia	Adelaide	Tonsley	Cooper Pedy	Kadina

TAFE Entity	Geographic region	Specific campuses			
		Adelaide College of the Arts	Urrbrae	Port Augusta	Narungga
		Elizabeth	Mount Barker	Mount Gambier	Port Pirie
		Gilles Plains	Victor Harbor	Ceduna	Amata
		Noarlunga	Barossa Valley	Port Lincoln	Ernbella
		Regency	Berri	Whyalla	Fregon
		Salisbury	Murray Bridge	Wudinna	Indulkana
					Kalka Pipalyatjara
					Mimili
TAFE Western Australia	Western Australia	Batavia Coast Maritime Institute	Leederville	Tom Price	Thornlie
		Carnarvon	Midland	Wyndham	Albany
		Exmouth	Mount Lawley	eCampus	Bunbury
		Geraldton	Nedlands (Oral Health Centre)	Armadale	Busselton
		Kalgoorlie	Perth	Bentley	Collie
		Merredin	Broome	Carlisle	Denmark
		Moora	Derby	Fremantle	Esperance
		Northam	Fitzroy Crossing	Jandakot	Harvey
		Technology Park	Halls Creek	Kwinana	Katanning
		Balga	Karratha	Mandurah	Manjimup
		Clarkson	Kununurra	Munster	Margaret River
		East Perth	Minurmarghali Mia (Roebourne)	Murdoch	Mount Barker
		Joondalup (Kendrew Crescent)	Newman	Naval Base	Narrogin
		Joondalup (McLarty Avenue)	Pundulmurra (South Hedland)	Rockingham	
Batchelor Institute	Northern Territory	Batchelor	Wadeye	Willowra	
		Casuarina/Darwin	Katherine	Yuendumu	
		Maningrida	Ngukurr	Nyirripi	
		Nhulunbuy	Borrooloola	Arlparra	
		Gunbalanya	Lajamanu	Alice Springs/Desert Centre	People's
TAFE Victoria	Victoria	Bendigo TAFE	Shepparton	Brunswick	Warragul
		Bendigo	Seymour	Melbourne	Gordon Institute of TAFE (The Gordon)
		Echuca	Werribee		

TAFE Entity	Geographic region	Specific campuses		
		Castlemaine	Shepparton	South West Institute of TAFE (SWTAFE)
		Bendigo	Holmesglen Institute	Colac
		Box Hill Institute	Chadstone	East Geelong
		Melbourne	Melbourne	Geelong
		Box Hill	Southbank	Hoppers Crossing
		Lilydale	Glen Waverley	Werribee
		Chisholm Institute	North Melbourne	Werribee
		Wonthaggi	Moorabbin	Victoria University Polytechnic
		Berwick	Chadstone	Melbourne
		Dandenong	Kangan Institute	Melbourne
		Cranbourne	Moonee Ponds	Werribee
		Dandenong	Essendon	Sunshine
		Frankston	Docklands	Swinburne University of Technology
		Rosebud	Melbourne Polytechnic	Melbourne
		Federation University Australia (Federation TAFE)	Broadmeadows	Footscray
		Wendouree	Richmond	Footscray
		Ballarat	Broadmeadows	St Albans
		Mount Rowan	Collingwood	William Angliss Institute
		Ballarat	Epping	Melbourne
		Horsham	Fairfield	Wodonga TAFE
		Goulburn Ovens Institute of TAFE (GOTAFE)	Greensborough	Barnawartha North
		Benalla	Heidelberg West	West Wodonga
		Shepparton	Prahran	
		Wangaratta	Preston	
			RMIT University	
			Bundoora	
				TAFE Gippsland (Federation Training)
				Sale
				Morwell
				Leongatha
				Kalimna West
				Bairnsdale
				Traralgon
				Newborough