

TEQSA's External Reporting Program

Consultation Paper

July 2016

ACPET submission

Introduction

Established in 1992, ACPET is the national industry association for private providers of tertiary education and training in Australia. ACPET has around 1,000 members who deliver a range of vocational education and training (VET), higher education, and English language programs across all states and territories, as well as internationally. Some 80 members deliver higher education services.

ACPET's mission is to enhance quality and choice in Australian tertiary education and training. Its members include commercial and not-for-profit entities, community and industry providers and enterprise-based training organisations. ACPET works with governments, industries and other stakeholders to ensure VET, higher education, English language and international education programs are well targeted, accessible and delivered to a high standard.

The recent Australian Government consultation paper, *Driving Innovation, Fairness and Excellence in Australian Higher Education*, outlines the importance of the sector to the future of Australian industry, businesses and families more than ever before. The paper also outlines the Government's commitment to a system that provides genuine choice and appropriate support for students, removes barriers for under-represented groups and allows institutions to deliver world class education¹.

Fundamental to the sector fulfilling its important role and potential is having diverse, responsive higher education institutions that can best respond to the needs of students and industry. It also requires students and industry that have the necessary information to choose a higher education institution that best meets their needs and aspirations.

Accessible, relevant information on the performance of the higher education sector and its institutions, universities and higher education providers (HEPs) alike, is fundamental to the sector's success and the choices of students and industry. ACPET has welcomed the greater transparency on the performance of the sector and providers that has come with the increasing recognition of the role of the 127 HEPs registered with TEQSA². The recent inclusion of HEPs in the Student Experience Survey provides additional new information for students to enhance their decisions around provider choice³. Similarly the publication, for the first time, of comprehensive Private University and Non-University Higher Education Institution data in the Department of Education and Training's Selected Higher Education Statistics provides new information to not only support students in their provider choice but for providers to better understand their performance relative to others⁴.

As a custodian of the higher education sector, TEQSA has an important role in not only ensuring quality standards are maintained but in informing students, industry and the sector alike on its performance and that of its providers. The annual statistical report on registered higher education providers provides a broad snapshot of the sector⁵. The most recent analysis of key financial metrics similarly provides a snapshot of the financial structure of the sector⁶.

While these reports are welcome, they do not (nor are they intended to) provide detailed analysis or insights into the performance of the sector or the outcomes of the various assessments undertaken by TEQSA as part of its regulatory responsibilities. This information, if readily accessible and tailored to the respective needs of students, industry and other stakeholders could not only greatly assist in ‘informing the market’ but also contribute to debate, research and other activities that seek to enhance Australian higher education. Accordingly, ACPET welcomes TEQSA’s intent to better inform students, industry and stakeholders and the opportunity to contribute advice to the proposed external reporting program outlined in the consultation paper.

Reporting and publishing data and analysis on assessment outcomes

Question One: *Do you support the proposed areas of coverage for the reporting of analysis and insights from TEQSA assessment outcomes? If not, why, and what changes would you propose?*

ACPET notes TEQSA’s proposal to publish the analysis of outcomes for its core assessment processes for the groupings indicated (Page 2). It is unclear, however, how the publication of the data on numbers of applications approved, rejected etc. will, of itself, provide the benefits outlined for stakeholders listed (Page 3).

Given the reality that much of the registration assessment activity is likely to be in relation to non-university providers care would need to be taken in putting such data summaries into context. It would be important that the registration approval processes are clearly outlined to avoid the ‘headline’ data being misinterpreted. The inclusion, for example, of historical approval data would assist the understanding of trends in approvals.

It is also worth noting that the Self-Accrediting Authority (SAA) status held by Australian Universities may give rise to some misinterpretation of course accreditation data. Once again, care would need to be exercised in contextualising these data summaries to include the differing processes that apply to SAA providers.

As to the proposed groupings there may be some value in considering the size of institutions, particularly for non-university providers where there is considerable variation.

ACPET sees real value in the proposal to summarise the compliance themes, underlying causes of non-compliance and insights into how providers have demonstrated compliance. Similarly, the publication of examples of good practice would be most welcome. These are the activities that could provide the benefits for stakeholders listed in the consultation paper. Real, practical examples (de-identified as appropriate) linked to the themes and insights would be most beneficial.

Question Two: *What supporting material could TEQSA provide to assist an understanding of compliance from these assessment processes?*

Consistent with the current practice, the publication of relevant guidance notes would assist higher education providers to better understand the key findings and themes arising from TEQSA's assessment processes. The inclusion of case studies in these guidance notes would help provide a 'real world' understanding.

ACPET members have also appreciated the opportunity to meet with TEQSA officers on a range of matters relating to its activities. The inclusion of this material in these briefings would also be welcome.

It is noted from the consultation paper that the benefits of publishing this material would include promoting the National Register as a source of information on the quality of providers in supporting student choice. While the National Register is the authoritative source on provider registration, it may be appropriate to link it to other sites that have a stronger student focus. As noted above, the Quality Indicators for Learning and Teaching (QILT) web site has a strong student focus, readily enabling the comparison of higher education institutions. Some link to the QILT site would increase the likelihood of students considering registration details in choosing their provider.

The Higher Education Standards Panel, as part of its work in considering measures to increase the transparency of admissions processes, has also canvassed the need for a single web site that would contain standardised admissions information for all higher education institutions⁷. Once again, some link to this site, should it proceed, may increase the likelihood of this material being considered by students.

Potential future areas for TEQSA's reporting program

Question Three: *Of the potential areas represented above, which information do you support being published by TEQSA?*

In considering the release of information in relation to risk analysis and decision making, compliance information and issue-specific reporting the consultation paper indicates the potential risks from the misinterpretation of such information.

TEQSA's Risk Assessment Framework (RAF) details that individual provider risk assessments "identify leads that warrant closer consideration by TEQSA case managers, but do not confirm there is necessarily a problem"⁸. They inform compliance activities and priorities. The RAF also outlines the importance of provider context in assessing potential risks and the process that can involve providers in considering and responding to identified risks.

Risk assessments are clearly not intended to define a provider's registration or other standards compliance. ACPET has real concerns that the publication of individual provider risk assessments will lead to their misinterpretation and the high likelihood they will be regarded as a proxy for registration or other compliance status. This could cause significant damage to providers and undermine confidence in the sector.

To be clear, ACPET strongly supports the intended purpose of these risk assessments, which is to inform a differentiated approach to evidence and reporting requirements in assessment processes. The risk-based approach to regulation adopted by TEQSA is one that should be adopted more broadly by tertiary education and training regulators and government contract managers.

The details of provider registration, including any conditions, are comprehensively detailed on the National Register. ACPET would support measures that make this information more widely available along the lines outlined in the response to Question Two above.

As with the proposed reporting on assessment outcomes ACPET would, nonetheless, support the reporting of the thematic issues that arise from TEQSA's broad compliance activities, including risk assessments.

Summary analysis of the risk ratings for each of the RAF risk indicators and their relationship with assessment outcomes would assist providers in appreciating their importance and in identifying where they may need to give greater attention. It should also, of course, validate a key element of the RAF and identify where adjustments may be required as the sector and market develops.

In terms of issues-specific reporting and research, ACPET has an ongoing interest in benchmarking and would welcome further TEQSA research and advice.

Question Four: *In publishing information on these areas, what risks/considerations should TEQSA take into account?*

As noted above, ACPET would have considerable concerns with the publication of individual provider risk ratings used to inform registration and accreditation compliance assessments. There is simply too great a risk that this material could be misinterpreted, damaging the reputation of providers and the broader sector. The National Register should be the definitive and only source of advice on provider compliance with the Higher Education Standards.

In considering publication of any summary compliance information or thematic issues, TEQSA also needs to take into account the strong community and stakeholder interest in light of the vigorous debate in relation to the future direction of the sector, including the role of competition, contestability and user

choice. Material published needs, where appropriate, to include appropriate contextual advice in order to minimise the risks of misinterpretation and damage to the sector.

Question Five: *Is there any other information held by TEQSA that you would find of value to inform the sector and general public's understanding of TEQSA and/or higher education providers?*

As the peak industry body for private providers of tertiary education and training, ACPET would welcome the opportunity to discuss the availability of other data that would support its efforts to enhance the sector.

A greater focus on outcomes, including attrition and progression, through data analysis, research and case studies would be useful in informing provider practice.

ACPET is well placed to work with TEQSA to ensure maximum information sharing with the sector.

Endnotes

¹ Australian Government, *Driving Innovation, Fairness and Excellence in Australian Higher Education*, May 2016, https://docs.education.gov.au/system/files/doc/other/he_reform_paper_driving_innovation_fairness_and_excellence_3_may_2016_-_pdf, p3

² TEQSA, accessed August 2016, <http://www.teqsa.gov.au/national-register>

³ The Social Research Centre, Accessed August 2016, [https://www.gilt.edu.au/about-this-site/student-experience-survey-\(ses\)](https://www.gilt.edu.au/about-this-site/student-experience-survey-(ses))

⁴ Department of Education and Training, 2015, accessed August 2016, <https://www.education.gov.au/selected-higher-education-statistics-2014-student-data>

⁵ TEQSA, April 2016, accessed August 2016, http://www.teqsa.gov.au/sites/default/files/publication-documents/HESStatisticsReport2016_190416.pdf

⁶ TEQSA, April 2016, accessed August 2016, <http://www.teqsa.gov.au/news-publications/key-financial-metrics-australia%E2%80%99s-higher-education-sector>

⁷ Department of Education and Training, 2016, accessed August 2016, <https://docs.education.gov.au/node/40541>

⁸ TEQSA, March 2014, accessed August 2016, <http://www.teqsa.gov.au/regulatory-approach/risk-assessment-framework>, p2