



Australian Government  
Tertiary Education Quality and Standards Agency



# Summary Report of the Consultation Process

TEQSA's External Reporting  
Program

*October 2016*

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# 1. Introduction

## 1.1 Background and Purpose

TEQSA is committed to ensuring that key stakeholders in Australia's higher education sector have access to relevant information to inform an understanding of higher education, its quality and regulation. As part of its ongoing monitoring and quality assurance activities, TEQSA collates and analyses a range of higher education provider data.

In its recent engagement with the sector, TEQSA discussed the publication of material it gathers and analyses as part of its regulatory activities, such as assessment outcomes and compliance with the Threshold Standards 2011. Feedback from the sector at provider round-table events in late 2015 supported the publication of further information, noting the potential sensitivities and the need for careful presentation of the information that TEQSA holds.

In July and August 2016, TEQSA conducted a formal consultation process seeking feedback on proposed content for TEQSA's External Reporting Program. This report provides an overview of key themes and responses expressed through the consultation process and TEQSA's response to the feedback received.

This report does not attempt to detail all feedback received by TEQSA during the consultation but, rather, highlights key feedback themes and how the feedback will be reflected in the proposed external reports.

## 1.2 Proposed External Reporting Program

TEQSA currently publishes a range of guidance material on its regulatory functions, and key sector data in the *'Statistics Report on TEQSA Registered Higher Education Providers'* and *'Key Financial Metrics on Australia's higher education sector'* reports.

In continuing to enhance the provision of information on Australia's higher education sector, TEQSA's proposed external reporting program is guided by the following principles:

- ▶ Promote knowledge of, and compliance with, the Standards;
- ▶ Improve information and transparency for students on provider operations, linking information to TEQSA's National Register;
- ▶ Increase transparency and guidance for stakeholders on TEQSA's operations;
- ▶ Contribute to the public discourse on Australian higher education by disseminating information unique to TEQSA's role as the sector's quality assurance and regulatory agency; and
- ▶ Guide and improve providers' understanding of TEQSA's assessment requirements.

The proposed external reporting program includes the planned release of sector-level information on provider compliance with the Threshold Standards 2011, including areas most commonly subject to assurance action. The analysis is intended to detail the outcomes of TEQSA's four core assessment processes: initial provider registration; renewal of registration; initial course accreditation; and renewal of course accreditation. The proposed groupings for this analysis are: Universities; Non-University Higher Education Providers – For Profit; and Non-University Higher Education Providers – Not-For-Profit (divided by TAFE, Faith-based and 'Other' providers).

Further to the planned publication of analysis of assessment outcomes, submissions were sought on other potential reporting areas including data and analysis relating to TEQSA risk assessments and the links between risk assessment and assessment outcomes. Finally TEQSA sought submissions on what other material it may publish that would be of use to stakeholders.

## 1.3 Consultation

In July and August 2016 TEQSA conducted a formal consultation process, which sought the sector's view on:

- ▶ the form and content of analyses relating to the outcomes of assessment processes, and
- ▶ the suitability of other areas of reporting that may be useful, including risk analysis and decision making, compliance reporting, and issue-specific reporting and research.

The paper posed five questions seeking feedback on TEQSA's proposed approach.

- ▶ **Question 1:** 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?
- ▶ **Question 2:** What supporting material could TEQSA provide to assist an understanding of compliance from these assessment processes?
- ▶ **Question 3:** Of the potential reporting areas presented above, which information do you support being published by TEQSA?
- ▶ **Question 4:** In publishing information on these areas, what risks/considerations should TEQSA take into account?
- ▶ **Question 5:** 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?

Information about the Consultation Paper was made available on the TEQSA website, via the TEQSA e-news, and sent to:

- ▶ four peak sector representative bodies: Universities Australia (UA), Council of Private Higher Education (COPHE), Australian Council for Private Education and Training (ACPET) and TAFE Directors Australia (TDA);
- ▶ other sector representative bodies: the Group of Eight (Go8), Innovative Research Universities (IRU), Regional Universities Network (RUN) and International Education Association of Australia (IEAA);
- ▶ student representative bodies: Council of Postgraduate Associations (CAPA); National Union of Students (NUS) and the Council of International Students Australia (CISA).

## 2. Consultation responses

TEQSA received 17 submissions to the consultation from stakeholders, noting that one-third of responses came from peak sector bodies representing a large portion of higher education providers.

Respondents were supportive of the proposed release of information on assessment outcomes. In particular, there was clear support for the concept TEQSA providing this information in a manner that assists with internal quality assurance, continuous improvement, and increased transparency of TEQSA decision-making and regulatory processes.

Common areas of feedback included:

- ▶ Support for high-level analysis and insights into areas of the Threshold Standards commonly met or not met by higher education providers. Analysis to focus on underlying causes of non-compliance, and examples of how providers have demonstrated compliance;
- ▶ The importance of publishing de-identified information (both in the reporting of non-compliance and in example case studies);
- ▶ Suggested revisions to the provider categories suggested in the paper, such as categorising by provider size, funding type, type of student cohort, discipline, or maturity of providers.
- ▶ The importance of contextualising the information presented, such as the difference between self-accrediting and non-self-accrediting providers;
- ▶ The need to link information on assessment outcomes to TEQSA guidance material to provide clarity around TEQSA's interpretation of the standards and support continuous improvement;
- ▶ A clear distinction between the Threshold Standards 2011 (the Standards) and the revised Higher Education Standards Framework 2015 (HESF), including linking areas of compliance to the HESF; and
- ▶ Presenting a range of examples of good practice and different types of case studies either de-identified or with provider consent.

There was general support for the potential areas of future reporting outlined in the consultation paper, with a number of suggestions of other types of information TEQSA could produce to assist the sector.

Feedback on the suggested areas of reporting included:

- ▶ Broad support for the release of information on risk assessment outcomes and their relationship to the outcomes of regulatory assessment processes;
- ▶ The need for clarity and contextual information to avoid misinterpretation of information relating to risk;
- ▶ Respondents strongly opposed the release of individual risk assessments or risk ratings in consideration of both reputational considerations and the nature of regulatory risk;
- ▶ Reporting on TEQSA's compliance activities generally supported, and was seen as way of improving TEQSA/provider interactions;
- ▶ Support for issue-specific reporting, particularly on themes such as compliance, trends and issues in national and international higher education, and examples of good practice.

It was also noted that any research or reporting should be drawn from information already gathered by TEQSA or in the public domain.

Other suggested areas where TEQSA may provide valuable information on the sector included:

- ▶ Additional data (including trend data), analysis, research and case studies relating to student performance, graduate outcomes and financial data, to assist with provider benchmarking;
- ▶ Guides and explanatory notes on the revised HESF, including how TEQSA interprets the revised Standards;
- ▶ Further development of the National Register, to aid transparency of regulatory outcomes;
- ▶ The development of information relevant to professional bodies, such as graduate outcomes; and
- ▶ General sector analysis, including specific issues affecting the sector (e.g. student performance, market dynamics).

### 3. TEQSA's response

Following consideration of the feedback received, TEQSA's responses and actions are as follows:

#### *Assessment Outcomes Reporting*

- ▶ TEQSA undertakes to provide information on the outcomes of assessment processes to support an understanding of the sector's compliance with the current Standards;
- ▶ The analysis may examine areas of higher education operations where providers have exhibited compliance and areas where TEQSA has undertaken assurance actions to guide providers in undertaking their own internal quality assurance;
- ▶ Information on areas of where assurance actions have been commonly undertaken, linking to guidance material relevant to the incoming HESF to support an understanding of TEQSA's interpretation of the standards;
- ▶ In undertaking this analysis TEQSA will analyse the outcomes of assessment processes by a range of potential divisions including those stated in the consultation paper (Universities, Non-University For-Profit, and Non-University Not-for-Profit (divided by TAFE, Faith-based and 'Other' providers). The resulting analysis may also report on other dimensions where this is found to provide an informative view of compliance themes; and
- ▶ Resulting reports on assessment outcomes will be de-identified, focussing on compliance themes and examples of good practice. TEQSA currently reports publically on individual provider compliance following a regulatory assessment process on the TEQSA National Register.

#### *Risk Analysis and decision making*

- ▶ TEQSA will explore the reporting of high level analysis of risk findings as part of its reporting program including a focus on the role of risk findings in assessment processes and outcomes;
- ▶ Reporting on the relationship between risk assessment findings and the outcomes of assessment processes will be explored to demonstrate the importance of providers engaging with risks identified in their risk assessment.
- ▶ TEQSA recognises the potential reputational risks with publishing information on the findings from risk assessments and feedback that information on sector risk should be high level and focus on system-wide risk as viewed through the TEQSA Risk Assessment Framework;
- ▶ Noting strong feedback, TEQSA will not release information on individual provider risk ratings. The outcomes of provider assessment processes (re-registration, (re)accreditations, etc.) will continue to be presented publically on the TEQSA National Register. and
- ▶ In planning a forward reporting program, TEQSA will link reported information to supporting material such as guidance notes and examples of good practice, to support an understanding of

regulatory requirements and TEQSA's interpretation of the current Threshold Standards and the incoming HESF.

#### *Future areas for TEQSA's reporting*

TEQSA's future reporting program will continue to be specifically linked to its role in quality assurance and regulation of the Australian higher education sector.

- ▶ Further reporting on, and analysis of, areas such as student outcomes and other sector level data will be considered in developing TEQSA's forward reporting program to support an understanding of trends in the higher education sector;
- ▶ Information presented by TEQSA will aim to assist an understanding of the higher education standards with the aim of supporting providers to view themselves and their performance in the context of the sector;
- ▶ In developing the forward work program TEQSA will seek to focus on analysis and research on ongoing or emerging issues of particular prominence or importance to higher education, and to support an understanding of the sector;
- ▶ TEQSA will provide guidance on the characteristics of good practice through the ongoing provision of guidance notes;
- ▶ The extent of the reporting program, including the ability to support the provision of performance data and case studies, will reflect TEQSA's resource capacity; and
- ▶ TEQSA will undertake this analysis with a view to the potential reputational impacts and potential for misinterpretation, will consider relevant contextual information and messaging, and where appropriate undertake further engagement on the presentation of this material with the sector.

## **4. Next steps**

TEQSA would like to acknowledge the time and effort of respondents as well as the very constructive feedback provided throughout the process, and to thank all individuals, providers and representative groups involved for their contributions.

TEQSA will publish a report of assessment outcomes on its website in the latter part of 2016.