



TEQSA Provider Survey 2024 Research report

Prepared for the Tertiary Education
Quality Standards Agency (TEQSA)

June 2024



Contents

<u>Background, objectives and methodology</u>	<u>3</u>
<u>Executive summary</u>	<u>6</u>
<u>Detailed findings</u>	<u>12</u>
<u>KPIs and overall performance</u>	<u>13</u>
<u>Overview</u>	<u>25</u>
<u>Communication</u>	<u>31</u>
<u>Consultation</u>	<u>36</u>
<u>Cost recovery implementation</u>	<u>41</u>
<u>Regulatory activities and approach</u>	<u>44</u>
<u>Monitoring quality</u>	<u>52</u>
<u>Applications</u>	<u>56</u>
<u>Changes in the last 12 months</u>	<u>64</u>
<u>Sector risks</u>	<u>69</u>
<u>Perceived strengths and weaknesses</u>	<u>73</u>
<u>Appendix: Interactions with TEQSA</u>	<u>78</u>



Background, objectives and methodology



The need for research

Background

The Tertiary Education Quality Standards Agency (TEQSA) is Australia's independent national quality assurance and regulatory agency for higher education.

TEQSA has conducted an annual stakeholder survey each year since 2016 (excluding 2020) to gain insights into stakeholder views of the Agency, its regulatory output and approach to risk.

Continuing this effort, TEQSA engaged JWS Research to conduct this program of work in 2024 with a view to gaining insights from providers. The outcomes from the research will be used to inform strategic initiatives in relation to continuous improvement by TEQSA, sector-wide risk management and stakeholder engagement. It will also be used to inform TEQSA's 2024 Annual Report.

Objectives

The overall aim of the survey among providers is to understand their experiences with TEQSA and to capture a holistic view of the Agency's performance.

Specific objectives include:

- Capturing insights into providers' views on the Agency's performance.
- Evaluation of how TEQSA is performing against Key Performance Indicators (KPIs).
- Understanding the views on the effectiveness of the relationship between TEQSA and TEQSA-regulated entities.
- Identification of potential and/or emerging sector-wide risks.
- Input into how the results can be translated into strategic initiatives.



Research methodology



TEQSA Provider survey

Unique contact details for n=202 primary contacts of TEQSA-regulated providers were provided by TEQSA. JWS Research emailed a link to the survey to the n=202 stakeholders for whom an email address was supplied, providing for an attempted census.

n=102 primary contacts each from different organisations including universities and institutes of higher education completed the survey, providing a response rate of 50%, meaning the survey captured the views of 50% of TEQSA regulated providers.

- Four reminder emails were sent to maximise participation in the survey.
- The maximum margin of error on the total sample of n=102 is +/-6.8% at the 95% confidence level. Margins of error are larger for sub-samples.
- Differences of +/-1% for net scores are due to rounding.
- 20 minutes in length.
- No weighting was applied.
- Analysis was conducted by provider category and comprised n=28 universities and n=74 colleges and institutes of higher education.

In order to enable comparisons to key metrics over time, the survey was largely kept consistent with previous years.

Fieldwork was conducted from the 2nd to the 30th May 2024.

The research was conducted in compliance with AS-ISO 20252.

Note: Qualitative research is exploratory in nature, and so the qualitative findings within this report are indicative only and are not necessarily fully representative of the target populations.



Executive summary



Executive summary

TEQSA's overall performance rating has improved



More than three quarters of providers (76%) rate TEQSA's overall performance as either 'excellent' or 'good' – a 10-percentage point increase from 2023.

While TEQSA's overall performance in 2023 dropped, this KPI has bounced back in 2024 to levels seen across 2019 to 2022 (76%) which represents a favourable result.

The overriding theme from providers is that they have noted improvements from TEQSA in the way it is engaging with the sector around sector-wide issues.

All individual KPIs have stabilised or improved compared to last year

Perceptions on all individual KPIs have either stabilised or improved following the declines seen in 2023 and are now back to levels seen in 2022, if not better.

The top two box rating ('excellent' or 'good') in the following areas has now reached or returned to a series high:



'Upholding quality standards with a proportionate approach to managing risks and supporting the sector to comply and improve' (Impact A) – 74% up from 61% in 2023.



'TEQSA's communication with your organisation is clear, targeted and effective' – 67% rate TEQSA performance on this metric as either 'excellent' or 'good' – on par with the 68% achieved in 2023.



'Continued improvement in regulatory framework in consultation with your organisation' – continued to rise to 60% this year from 51% last year and its lowest point of 46% on 2022.

Regulation that does not impede efficient operation is the lowest ranked KPI

Impact B (measuring that regulation by TEQSA does not unnecessarily impede the efficient operation of higher education providers) is TEQSA's lowest ranked KPI. Just over half of providers rate performance as 'excellent' or 'good' (52%).



Executive summary (cont'd)

Communication and information provision remain the areas where TEQSA performs best



Consistent with last year, TEQSA performs best (considering the proportion of 'excellent' or 'good' ratings) in the usefulness of its resources to providers. Specifically, this includes the usefulness of information through good practice notes, guidance notes, workshops and webinars, and TEQSA's website and newsletters.



The **TEQSA 2023 Conference** continues to be well received with nearly three quarters of providers (73%) rating it as 'excellent' or 'good', a steady increase over time from 60% in 2022. Further, it has one of the strongest components of 'excellent' rating at 34%.

Interestingly, ratings of the TEQSA Conference are higher among universities (82%) compared to other providers (70%). This reflects further commentary from non-university providers that the conference content is too geared towards universities and does not always recognise the unique challenges of non-university providers well enough.

Regulatory process issues, particularly with respect to timeliness of decisions and feedback continue to be the least well performing areas



Performance on '**minimising the time taken between submitting an application and first receiving a regulatory decision**' continues to decline (to 30% from 40% last year). This is reflected in some of the feedback which speaks to lengthy wait times for decisions on registration or re-registration of courses, severely impacting providers' ability to move forward.



'**Giving feedback on applications that are unlikely to be successful**' is at its lowest score of 38% compared to 46% last year and 56% in 2022.

However, from a regulatory process point of view, TEQSA has seen a strong upswing in perceptions of '**helping the sector as a whole to manage risks**', up from 57% last year to 65% this year.

TEQSA also continues to perform well in terms of '**treating you with politeness and respect**' with 81% of providers giving an 'excellent' or 'good' rating.



Executive summary (cont'd)

TEQSA's performance in terms of consultation with the sector has declined



Performance across all consultation metrics has declined and reached an all-time low since measurement began in 2019.

In particular, the metric of '**providing your organisation with the opportunity to give feedback on the annual risk assessment process**' has seen a significant drop from 72% last year who rated it 'excellent or 'good' to just 45% in 2024, reversing an upward trend seen in 2023. Many providers claim they receive little to no interaction with TEQSA and receive little response on issues they have raised, exacerbating the feeling of a lack of consultation.



TEQSA's performance on '**listening to your organisation's views on ways to reduce regulatory administrative burden**' remains the lowest rated consultation metric – where less than half of providers offer 'excellent' or 'good' ratings (40%).

Usefulness of information on changes to fees and charges most well-regarded cost-recovery metric



Two thirds of providers (66%) consider the '**usefulness of the information on changes to TEQSA's fees and charges**' as either 'excellent' or 'good', a further 30% rate this as 'fair'.

However, just over half (52%) provide an 'excellent' or 'good' rating on the '**usefulness of advice and support when using forms related to applications within the Provider Portal**'. That said, the rating is much higher among Institutes of Higher Education (61%) compared to universities (23%). This suggests a gap in consistency across the sector's experience with the Provider Portal, which may need further attention.

Quality monitoring has seen improvement



TEQSA's performance on '**suggesting networks and resources that your organisation might use to improve performance**' has improved considerably from 45% last year to 58% this year. Other metrics have seen small upward shifts.



Executive summary (cont'd)

Metrics regarding TEQSA applications have generally improved; CRICOS metrics mostly stable

Encouragingly, most metrics regarding TEQSA applications have seen a positive upswing compared to last year, particularly with respect to the clarity around assessments and application guides.



That said, the '*timeliness of feedback from TEQSA about your application*' continues to be a poor performing metric for TEQSA. Although an improvement on last year, only half of providers (50%) rate it as 'excellent' or 'good'.

Cyber security is considered the sector's top risk



Just over seven in ten providers (72%) believe that the threat of cyber security is high to the sector. This is perceived the greatest sector risk of those evaluated.

The threat of AI is similarly a high threat



The impact of generative artificial intelligence on the integrity of higher education awards (71%) is similarly considered a high risk to the sector. Moreover, providers have shown concern about AI's impact in decreasing the worth and significance of higher education among students.

Providers are alarmed about Government policy changes regarding international students



International students are crucial for the sector and the changes in Government policy have caused major concern for providers.



Considerations and opportunities

Continue to harness areas that support improved performance

TEQSA has seen a strong upward lift in overall perceived performance and most of the KPIs that underpin that. TEQSA should continue its approach to proportionate risk management, clear and targeted communications and continued improvement in the regulatory framework. Streamlined compliance approaches are also valued.

Continue to continuously improve the Conference

Perceptions of the TEQSA Conference continue to improve and it is clearly well received. However, non-university providers rate it less well than universities. TEQSA should continue to ensure the content is seen to address the challenges of both universities and non-university providers.

Timeliness of decisions and feedback warrants further attention

'Minimising the time taken between submitting an application and receiving a regulatory decision' as well as 'giving feedback on applications that are likely to be unsuccessful' continue to be two of the lowest performing areas for TEQSA, indicating further attention is required to bring these up to standard.

Improve consistency of experience on the Provider Portal

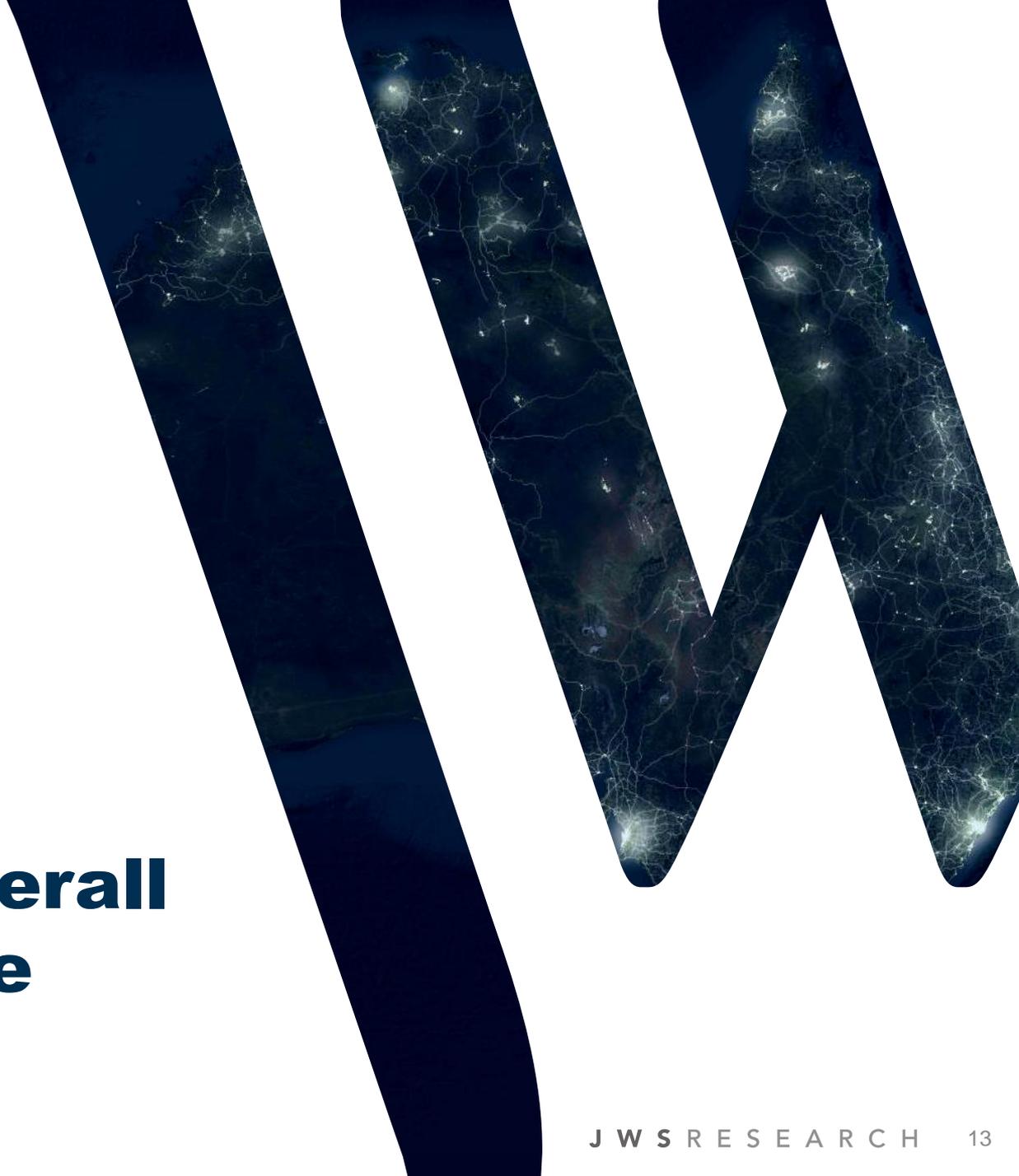
Perceptions of the usefulness of the Provider Portal between university providers and other higher education providers is markedly different (23% compared to 61% respectively). This suggests a gap in consistency across the sector's experience with the Provider Portal, which may need further attention.

Strengthen risk mitigation of key threats

Cyber security and AI continue to be the sector's biggest risks according to providers and these issues will continue to need strong risk mitigation strategies to help providers with these challenges. There is also a strong need for guidance regarding the changes in Government policy regarding international student visas.



Detailed findings



KPIs and overall performance



Section highlights: KPIs and overall performance

Perceptions of TEQSA's overall performance has improved

The proportion of providers who rate TEQSA's overall performance as 'excellent' or 'good' has increased by 10 percentage points from last year to 76% and marks a recovery from the decline in perceptions last year. The 2024 result is in line with TEQSA's overall performance in previous years (2019 to 2022) and is a highly favourable outcome.

All KPIs have improved or stabilised compared to last year

All of TEQSA's KPIs have improved or have stabilised compared to last year. Impact A (upholding quality standards with a proportionate approach to managing risks and supporting the sector to comply and improve) (74%) improved by 13 percentage points. Perceptions of compliance and monitoring, and continuous improvement have also increased from 51% in 2023 to 59% and 60% respectively.

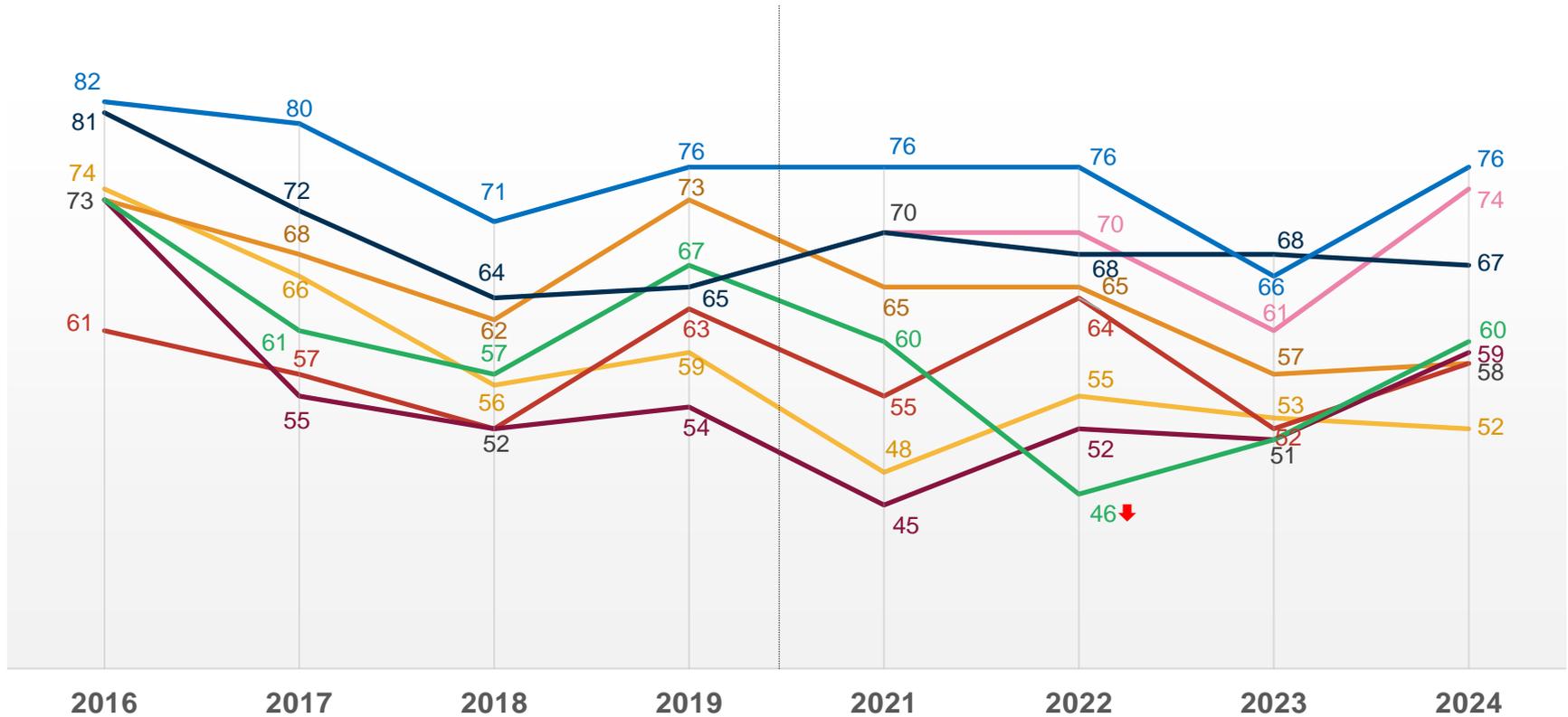
Be mindful of ensuring regulation does not create unnecessary burdens

Impact B (regulation by TEQSA does not unnecessarily impede the efficient operation of higher education providers) is TEQSA's lowest ranked KPI. Just over half of providers rate performance as 'excellent' or 'good' (52%). This result is among the lowest received for this metric, suggesting a need for TEQSA to work toward ensuring regulatory requirements are not unnecessarily burdensome



Summary of KPIs

% Total excellent + good*

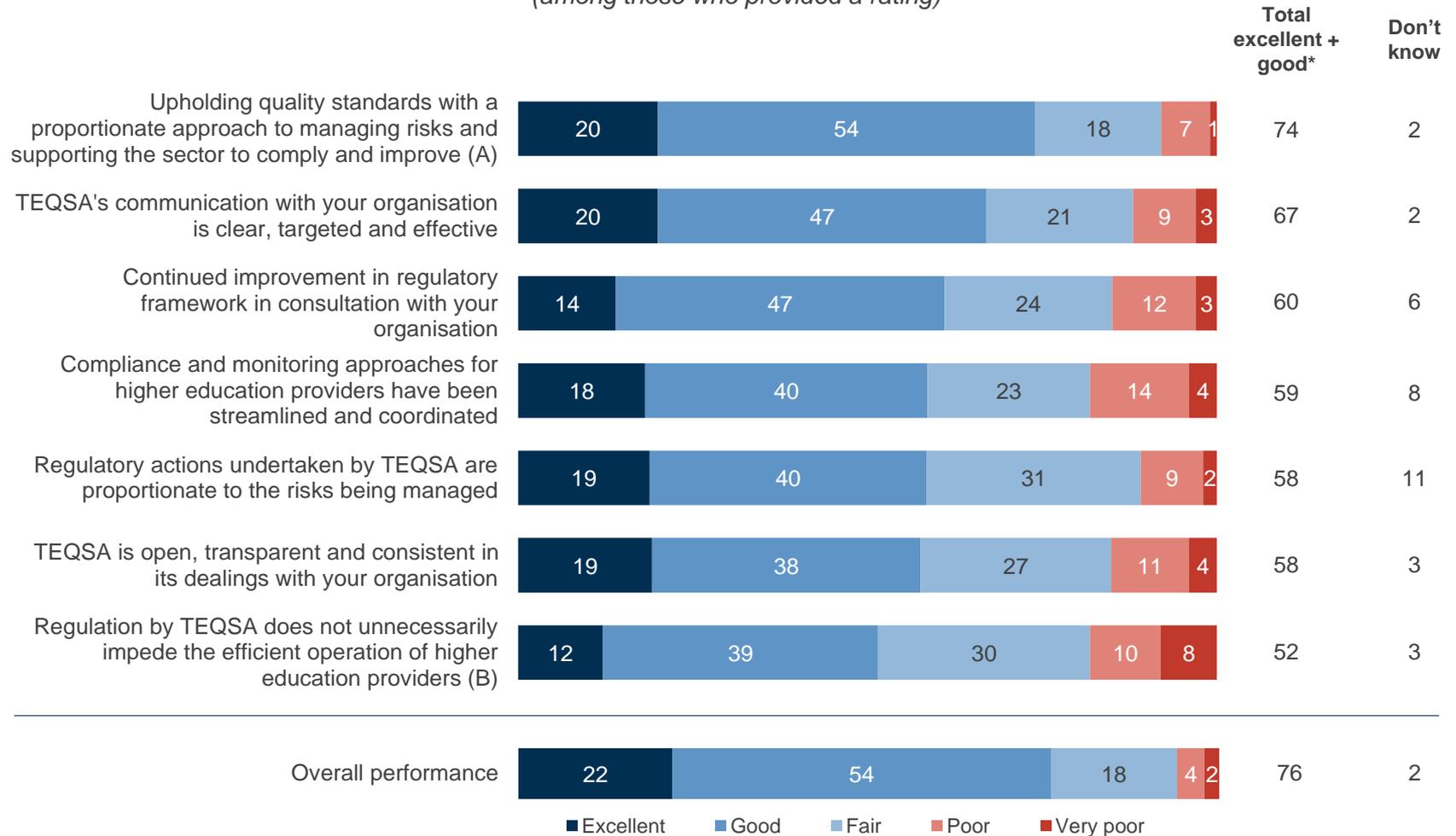


Don't know responses have been excluded from the 'Total excellent + good' calculation.
 Please note that in 2020, the annual TEQSA Stakeholder Survey was not conducted.
 Please note that 'Impact A' was a new KPI metric in 2021.
 Significantly lower ▼ than the previous years result at the 95% confidence interval.
 * Don't know responses have been excluded from the 'Total excellent + good' calculation.



Perceptions of KPIs and overall performance

KPIs and overall performance (%)
(among those who provided a rating)



Q1. Please rate TEQSA's performance over the last 12 months on each of the following indicators / Q16a. How would you rate TEQSA's performance over the last 12 months as the regulator assuring the quality of Australian higher education?

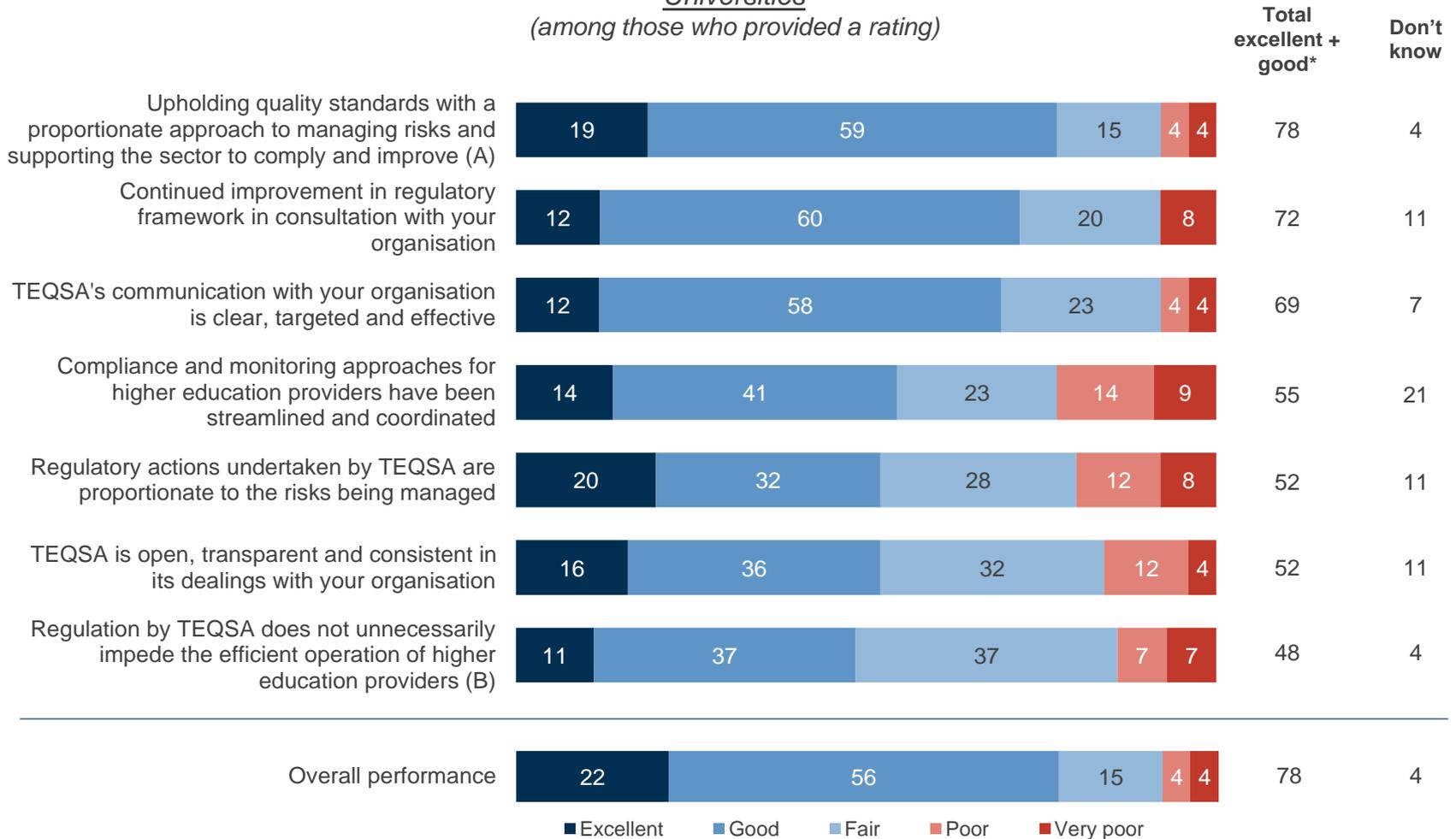
Base: All respondents (n=102).

* Don't know responses have been excluded from the 'Total excellent + good' calculation.

Perceptions of KPIs and overall performance: among universities



KPIs and overall performance (%)
Universities
 (among those who provided a rating)



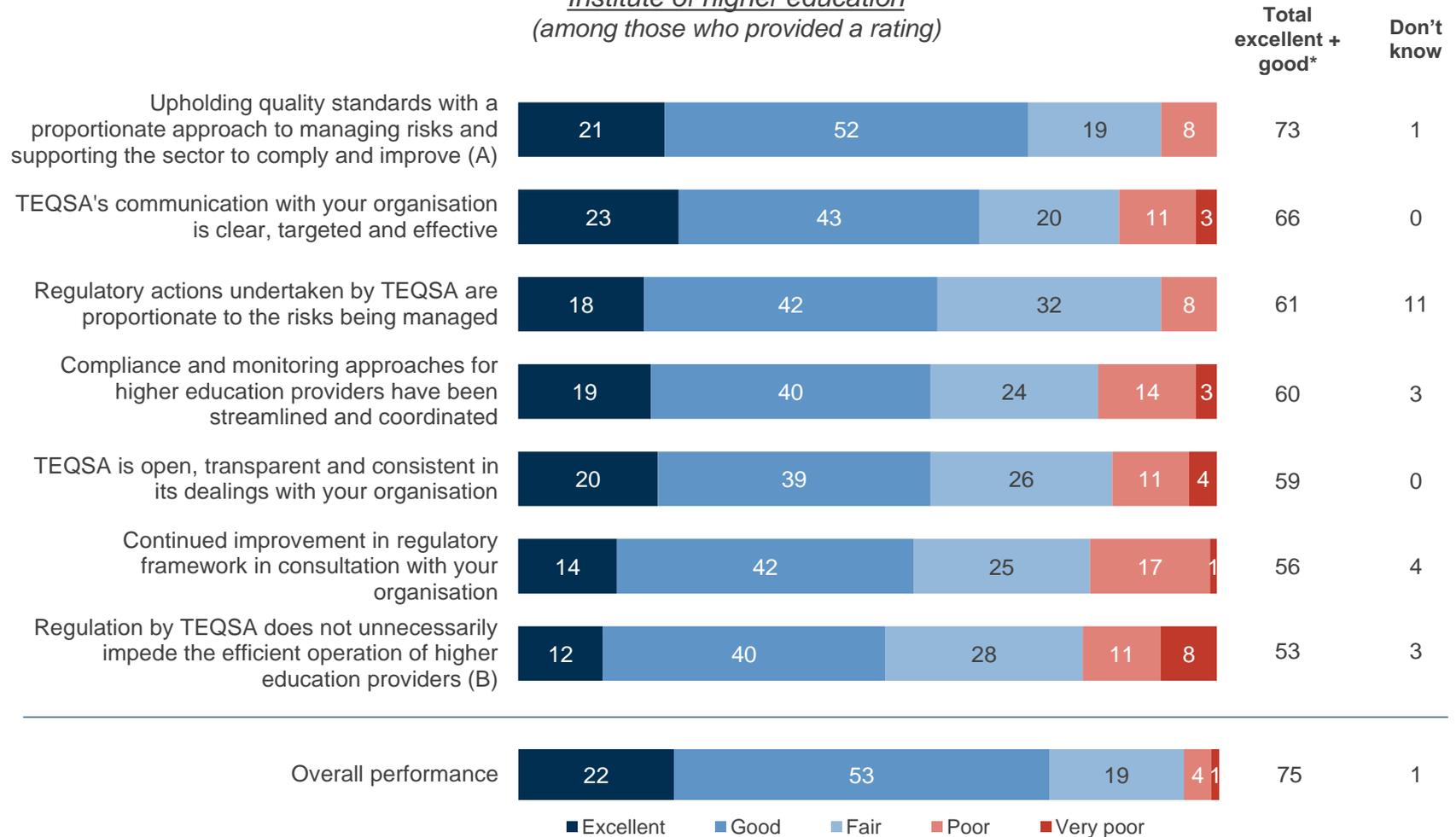
Q1. Please rate TEQSA's performance over the last 12 months on each of the following indicators. / Q16a. How would you rate TEQSA's performance over the last 12 months as the regulator assuring the quality of Australian higher education
 Base: Universities (n=28).

* Don't know responses have been excluded from the 'Total excellent + good' calculation.

Perceptions of KPI and overall performance: among higher education providers



KPI and overall performance (%)
Institute of higher education
 (among those who provided a rating)



Q1. Please rate TEQSA's performance over the last 12 months on each of the following indicators. / Q16a. How would you rate TEQSA's performance over the last 12 months as the regulator assuring the quality of Australian higher education
 Base: Higher education providers (n=74).

* Don't know responses have been excluded from the 'Total excellent + good' calculation.

Providers note improvements by TEQSA in communicating regulatory changes and sector risks



The overriding theme from providers is that they have noted improvements from TEQSA in the way it is engaging with the sector around sector-wide issues.

In particular, the narrative around the use of generative AI is seen to be handled very well by TEQSA, ensuring widespread communication around TEQSA's standpoint on this issue. Further, the broad-based guidance on compliance issues is also clear.

For the most part, this is seen to be delivered via channels that are appreciated by providers, including the annual conference update and webinars. Direct communications from TEQSA are also noted as a key channel for receiving these updates, which providers value.

“Consultation and communication from TEQSA has improved over the past year.”

“TEQSA has improved the way it communicates to the sector broadly.”

“The recent implementation of the TEQSA Talks webinars has been positive, enabling more direct communication between TEQSA and providers.”

“Overall engagement with the sector and educational advice in relation to complying with the Standards Framework (e.g. Guidance Notes, Academic Integrity, generative Artificial Intelligence) is very good.”

“TEQSA are doing a great job with being proactive with generative AI.”

“I appreciate receiving information at the annual conference and via correspondence of the key issues that TEQSA will be focusing on in the following year, e.g. AI in teaching and learning; responding to gender-based violence.”

“The regulation around the risks of AI and the sector meeting the HESF has been well managed as TEQSA has been highly consultative.”

Three areas in particular impact negatively on perceptions of TEQSA's overall performance



(Re)registration process takes too long

Also raised last year as a concern, the process for registration and/or re-registration of courses is seen to take too long, impacting on provider efficiency. There is also little in the way of ongoing updates for providers.

"We are currently awaiting the outcome of provider re-registration and there has been no indication of the status of the application and how long the assessment may take."

"Our specific experience in relation to our provider re-registration and course accreditation has been lacking proactive communication from TEQSA in relation to the timely advice around application requirements, and progress through the stages of assessment."

"The assessment of new courses is so very, very, slow. This impedes HEP innovation and reduces student choice."

"Excessive delays in registration and accreditation renewal."

Inconsistent/ poor communication with provider

Providers note inconsistencies with communications – at times highly responsive, at other times exceptionally slow. This inconsistency also applies to clarity around expectations from providers.

"Slow to respond sometimes, but almost instantaneous at other times!"

"We do not have clear instructions about the registration and accreditation requirements. We are told that TEQSA no longer requires detailed documentation such as minutes of meetings. But we are not told what exactly should take its place."

"Senior TEQSA representatives have refused to engage with my organisation over major concerns despite repeated requests. Extremely slow responses (if at all) over some other issues."

"We had some issues with a lack of helpful and timely communication to emails requests for information."

Over-burdening of reporting on extraneous matters

This year has seen requests from TEQSA to regularly report on other issues such as student protests. This requirement seems disproportionate to TEQSA's remit and is over-burdensome for providers.

"Asking for fortnightly updates on the student activism on campus is burdensome and presumptuous. It was an overreaction to an immediate issue."

"The fortnightly reporting on staff and student wellbeing and complaints in relation to the Middle East conflict does not seem to be proportionate to risk."

"Most responses are proportionate and measured however some media pressures do at times distract."

As noted in previous years, the relationship a provider has with TEQSA is highly dependent on their case manager



Perceptions of TEQSA's performance can be variable and is often based on the individual case manager providers have and how responsive they are.

Where case managers are responsive, this has been noted by providers as a positive and an improvement to their overall engagement with TEQSA.

Some providers identify the difference when a new case manager has been assigned to them, and this can lead to improved overall perceptions of TEQSA's performance.

"Since the loss of our previous TEQSA case manager, we have not experienced the same level of support and confidence in TEQSA. We now have another new case manager. She does seem very switched on and capable. We are anticipating a more collegial relationship with this case manager."

"Our case manager has been helpful and responsive, although the matters she may assist with are at times limited as it is dependent on other teams."

"TEQSA staff (Case Manager and CRICOS team) have been very responsive and helpful in responding to our communication or requests."

"However, it has improved in the last few months with a new case manager who has been exceptional in communicating and following up."

Frustrating difference in standards of timeliness of communications between TEQSA and providers



“Having undergone a re-registration process over the past year, we found that although we adhered closely to deadlines for submission and reporting, the same standard was not in play for TEQSA. There has been a noticeable lack of engagement and communication.”

“TEQSA are inconsistent, late and not transparent in their communications. They insist on impractical tight deadlines for correspondence from providers, but do not provide the same in return.”

“Assessments of courses and reaccreditation take far too long. As providers we are required to respond within certain timeframes and the same should be applied to TEQSA for regulatory work and assessments.”

Some providers note a difference in standards of timeliness between what TEQSA expects from providers and what they, themselves, deliver.

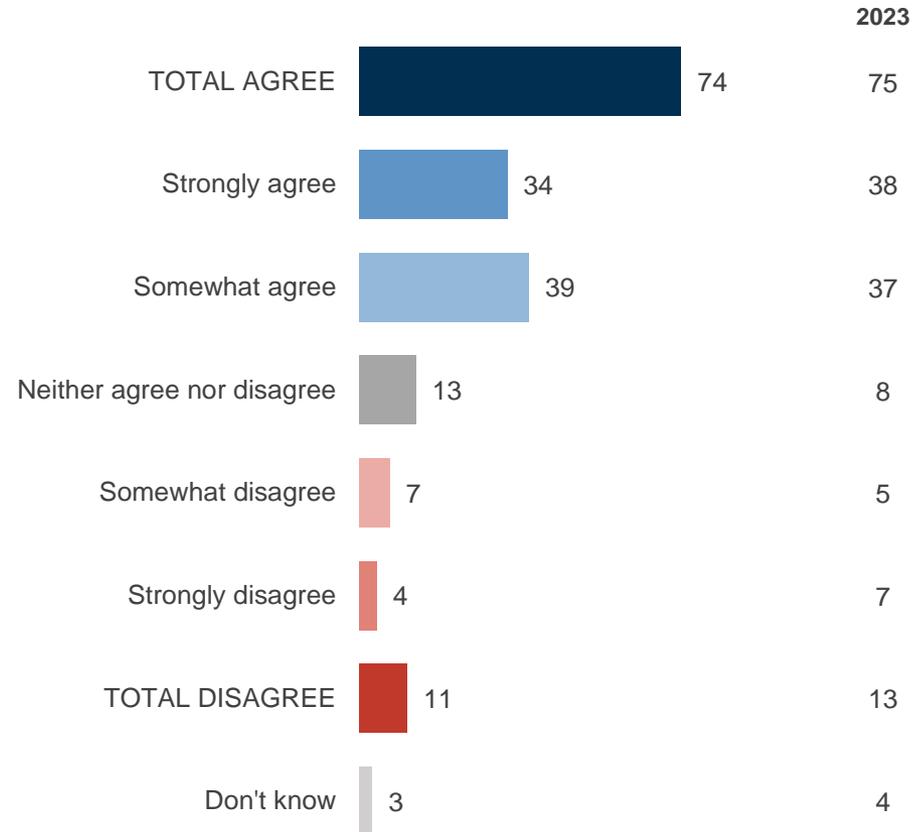
While TEQSA expect providers to deliver responses in a highly timely, and sometimes somewhat unrealistic fashion, they claim not to receive the same timeliness in return. This is seen as not only frustrating but somewhat hypocritical on behalf of TEQSA.

The expectation is that if TEQSA are requiring responses within tight timeframes, then the same should apply to TEQSA's responses back to providers.

Three quarters of providers agree their experience with TEQSA staff in the last 12 months reflects TEQSA's values



Agreement that TEQSA staff reflect TEQSA's values of trust, respect, accountability and collaboration (%)



Q9c. TEQSA's values are Trust, Respect, Accountability and Collaboration. To what extent do you agree or disagree that your experience with TEQSA staff over the last 12 months reflected these values?
 Base: All respondents (n=102); 2023 (n=95).

TEQSA staff are seen to uphold the regulator’s values and this is also reflected through case managers



Almost three quarters of providers (74%) agree that TEQSA staff uphold the values of the organisation, including those of trust, respect, accountability and collaboration. This is similar to last year and represents a strong response from providers.

For the most part, this is evidenced when providers acknowledge the work of their case managers who they have a good relationship with and feel are responsive to their needs.

That said, some individual providers reflect on poorer relationships at a broader TEQSA level or indeed among more senior TEQSA staff, which does not reflect as well in terms of upholding TEQSA values.

“We would like to acknowledge our case managers for their professional and knowledgeable support and advice.”

“TEQSA case managers are knowledgeable and very helpful. The information TEQSA provided consistently about the sector risks, and moving to self-assurance model has been very helpful.”

“It’s not the staff as such. They are hamstrung by the system which does not allow for real interaction between TEQSA and providers.”

“Whilst our case manager answers any questions we email through, there is no contact initiated from TEQSA.”

“Very unhappy with the failure of the most senior TEQSA representatives to engage with major concerns that have been raised repeatedly.”



Overview



Section highlights: Overview

TEQSA continues to perform best in information provision

Consistent with last year, TEQSA performs best (considering the proportion of 'excellent' or 'good' ratings) in the usefulness of its resources to providers. Specifically, this includes the usefulness of information through the good practice notes, guidance notes, workshops and webinars, and TEQSA's website and newsletters.

The time taken to make regulatory decisions is rated lowest

Providers have rated TEQSA's performance in 'minimising the time taken between applying and first receiving a regulatory decision' the lowest of all metrics evaluated (30%). Perceptions have declined from last year by 10 percentage points. Further, and relatedly, the next lowest rated metric is 'giving feedback to save your organisation using its resources on applications that are unlikely to be successful' (38% rating TEQSA as 'excellent' or 'good' here).

Universities are just as complimentary as institutes of higher education

When considering the proportion of 'excellent' or 'good' perceptions of TEQSA's performance across all metrics, ratings not statistically significantly different (at the 95% confidence interval) between universities and institutes of higher education. Differences vary between the groups with no pattern emerging.



Interpreting the overview analysis

The following pages provide an overall comparison of TEQSA's performance on individual metrics evaluated. Below is a legend to illustrate the area which individual metrics relate to.

Communication
Consultation
Cost recovery
Regulatory processes and activities
Monitoring quality
Applications

TEQSA's performance is rated highest on the usefulness of information in the good practice and guidance notes



	Performance (% Excellent + good*)	Universities#	Institutes of Higher Education
Usefulness of the information contained within the good practice notes	88	93	86
Usefulness of the information on the HES Framework (Threshold Standards) 2021 in the form of the guidance notes	84	85	84
Usefulness of TEQSA-facilitated workshops and webinars to discuss regulatory requirements and quality issues	82	88	80
Usefulness of information on TEQSA's regulatory policies and processes – provided through TEQSA's website and newsletters	81	93	77
Treating you with politeness and respect	81	78	82
Clarity of the assessment scope and evidence requirements (CRICOS)	78	81	77
Clarity of the application guide (easy to understand) (TEQSA)	76	73	76
Using a variety of media and channels to communicate sector-wide updates	75	64	79
Usefulness of the TEQSA Talks webinar	73	69	75
Usefulness of the TEQSA 2023 Conference	73	82	70
Clarity of the assessment scope and evidence requirements (TEQSA)	72	70	72
Usefulness of information provided on the National Register (showing the results of regulatory decisions)	69	69	69
Being fair and reasonable	68	62	71
Clarity of the application guide (easy to understand) (CRICOS)	68	69	67
Providing opportunities to address matters relevant to a regulatory decision, prior to a final decision being made	67	46	71

Base: All respondents (n=55-101); universities (n=10-27); institutes of higher education (n=41-74).

* Don't know and not applicable responses have been excluded from chart and 'Total excellent + good' calculation.

Caution: small sample size (n<30).

Applications and cost recovery matters remain TEQSA's mid-tier performers



	Performance (cont'd) (% Excellent + good*)	Universities#	Institutes of Higher Education
Usefulness of information about how to prepare an application (CRICOS)	67	69	67
Usefulness of the information available on our website about TEQSA's fees and charges	66	69	65
Helping the sector as a whole to manage risks	66	77	62
Helpfulness of information on how to use the provider portal (for preparing and submitting applications online) (CRICOS)	66	62	67
Helping the sector as a whole deliver quality higher education	65	68	63
Usefulness of information on how to prepare an application (TEQSA)	65	64	65
Usefulness of feedback from TEQSA about your application (CRICOS)	65	83	60
Facilitating/helping the sector as a whole to protect students	64	69	62
Usefulness of feedback from TEQSA about your application (TEQSA)	64	73	62
Usefulness of materials explaining how your registered higher education provider charge was calculated	63	65	62
Timeliness of feedback from TEQSA about your application (CRICOS)	63	56	66
Being encouraging without setting up unrealistic expectations	62	55	64
Explaining clearly why decisions were made	60	56	62
Transparency of TEQSA's cost recovery processes in relation to fees and charges	59	62	58
Having an accountable regulatory process where decisions are transparently justified	59	55	61

Base: All respondents (n=55-101); universities (n=11-26); institutes of higher education (n=42-74).

* Don't know and not applicable responses have been excluded from chart and 'Total excellent + good' calculation.

Caution: small sample size.

Consultation, quality monitoring and timeliness aspects are among TEQSA's lowest performing areas



Base: All respondents (n=50-91); universities (n=9-25); institutes of higher education (n=41-74).

* Don't know and not applicable responses have been excluded from chart and 'Total excellent + good' calculation.

Caution: small sample size.



Communication



Section highlights: Communication

The usefulness of information remains well regarded

Positive ratings ('excellent' or 'good') on the usefulness of TEQSA's resources have been consistently stable and high over time. More than eight in 10 providers provide a rating of 'excellent' or 'good' for the usefulness of the information contained in the good practice notes (including 35% who rate it as 'excellent'), on the HES Framework via guidance notes, and on regulatory policies and processes.

Ratings of TEQSA's Conference have improved over time

Perceptions of TEQSA's annual conference have improved over time, from 60% of providers rating this as 'excellent' or 'very good' in 2022 to 73% this year (including 34% who rate the Conference as 'excellent'). The TEQSA Talks webinar, in its first year, has also been highly useful (73% of providers rating it as 'excellent' or 'very good'), as are the TEQSA-facilitated workshops and webinars (82%).

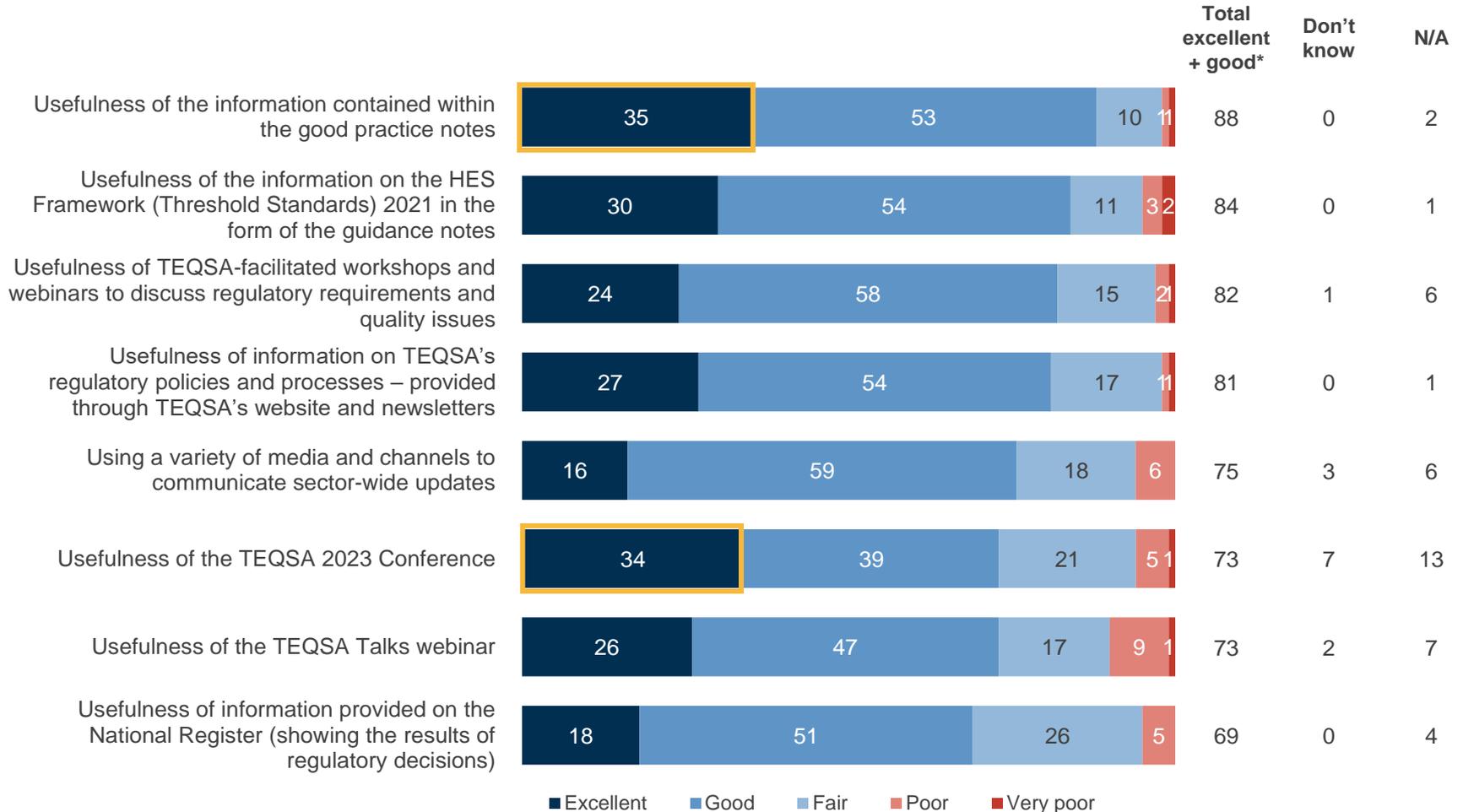
Usefulness of information on the National Register an area to attend to

Perceptions of the usefulness of information provided on the National Register (showing results of regulatory decisions) have declined this year (69% rating this as 'excellent' or 'very good', down nine percentage points from 2023), returning to 2021 levels. It is the lowest ranked communication metric this year. This is not a poor result in and of itself, but an area for TEQSA to review and shore up its efforts.

Good practice notes and the Conference are well regarded for their usefulness as a means of providing information



Performance of TEQSA's communication in the last 12 months* (%)



Q7. Thinking about information provided to the sector in general, how would you rate TEQSA's performance over the last 12 months?

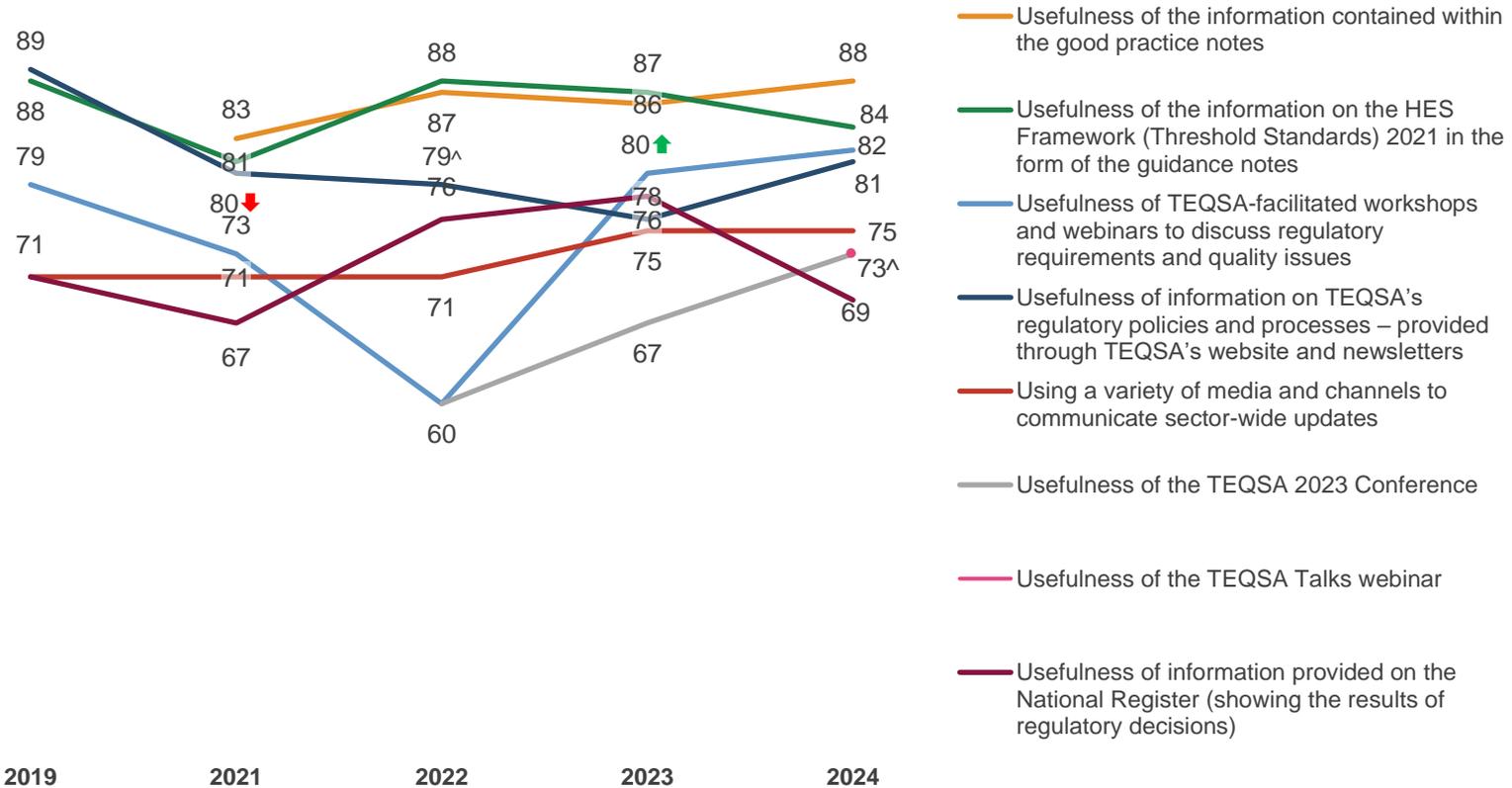
Base: All respondents (n=102).

* Don't know and not applicable responses have been excluded from chart and 'Total excellent + good' calculation.



Communication

Performance of TEQSA's communication
(% Total excellent + good*)



Q7. Thinking about information provided to the sector in general, how would you rate TEQSA's performance over the last 12 months?
Base: Respondents who provided a rating – 2024 (n=82-101); 2023 (n=75-95); 2022 (n=73-96); 2021 (n=115-126); 2019 (n=125-140).

* Don't know and not applicable responses have been excluded from 'Total excellent + good' calculation.

^ Indicates wording changed slightly.

Significantly higher ▲ / lower ▼ than the previous years result at the 95% confidence interval.

Conferences and webinars are well received, addressing some issues could further increase their usefulness



Providers value the opportunities delivered through the TEQSA hosted webinars (TEQSA Talks) and the annual conference. These allow providers a broad-based awareness and understanding of sector-wide issues and their implications.

Most providers rate the usefulness of the TEQSA Conference and the TEQSA Talks webinars highly (75% of providers who gave a rating rate these as 'excellent' or 'good'). However, there equally remains some feedback and concerns noted:

- The sessions appear to be less about engaging **with providers** than talking **to providers**, with complaints around the lack of invited conversation around the topics.
- Insufficient examples or case studies makes the topic areas less directly relevant and applicable to providers and reduces the opportunity for cross-sector learning.
- Some technical issues have been experienced meaning not everyone can engage with the forum effectively.
- Some claim the focus is far too heavily weighted towards universities meaning that non-university providers do not benefit from the sessions.

"The introduction of the TEQSA talks webinar is also valuable."

"The TEQSA Conference is a valuable opportunity for connection with industry and is well regarded. However, the online version of the conference suffered technical and format difficulties which reduced its overall usefulness."

"The TEQSA Talks webinars are presented in a one way format even though TEQSA encourage providers to ask questions, the format is in a way that it feels like TEQSA is instructing providers rather than establishing a conversation."

"The first TEQSA Talk was disappointing. Did not tell us more than what we already knew."

"The TEQSA Conference is a highlight each year, but we really miss the opportunity to present to peers on case studies and examples from our own institutions. This is where a lot of cross-sectoral learning takes place and I've implemented ideas that I learned about from peers at previous TEQSA conferences."

"Conference attendance for online participants remains a poor experience with a predominantly university focus that precludes areas of interest for pathway colleges such as ours."



Consultation



Section highlights: Consultation

Performance on feedback process for annual risk assessments has declined

Less than half of providers (45%) rate the process of allowing them to provide feedback on the annual risk assessment as 'excellent' or 'good'. Performance here has declined by a significant 27 percentage points from a peak rating in 2023. It is among the lower ranked metrics this year, making it an area TEQSA should look to improve.

A need for a focused effort on consultation

Performance across all consultation metrics have declined, with each reaching a five year low. Individual feedback from some providers suggests they receive little to no interaction with TEQSA and/or they receive a lack of response on issues they have raised. It is also worth noting that for one in five providers, these metrics are deemed to be not applicable.

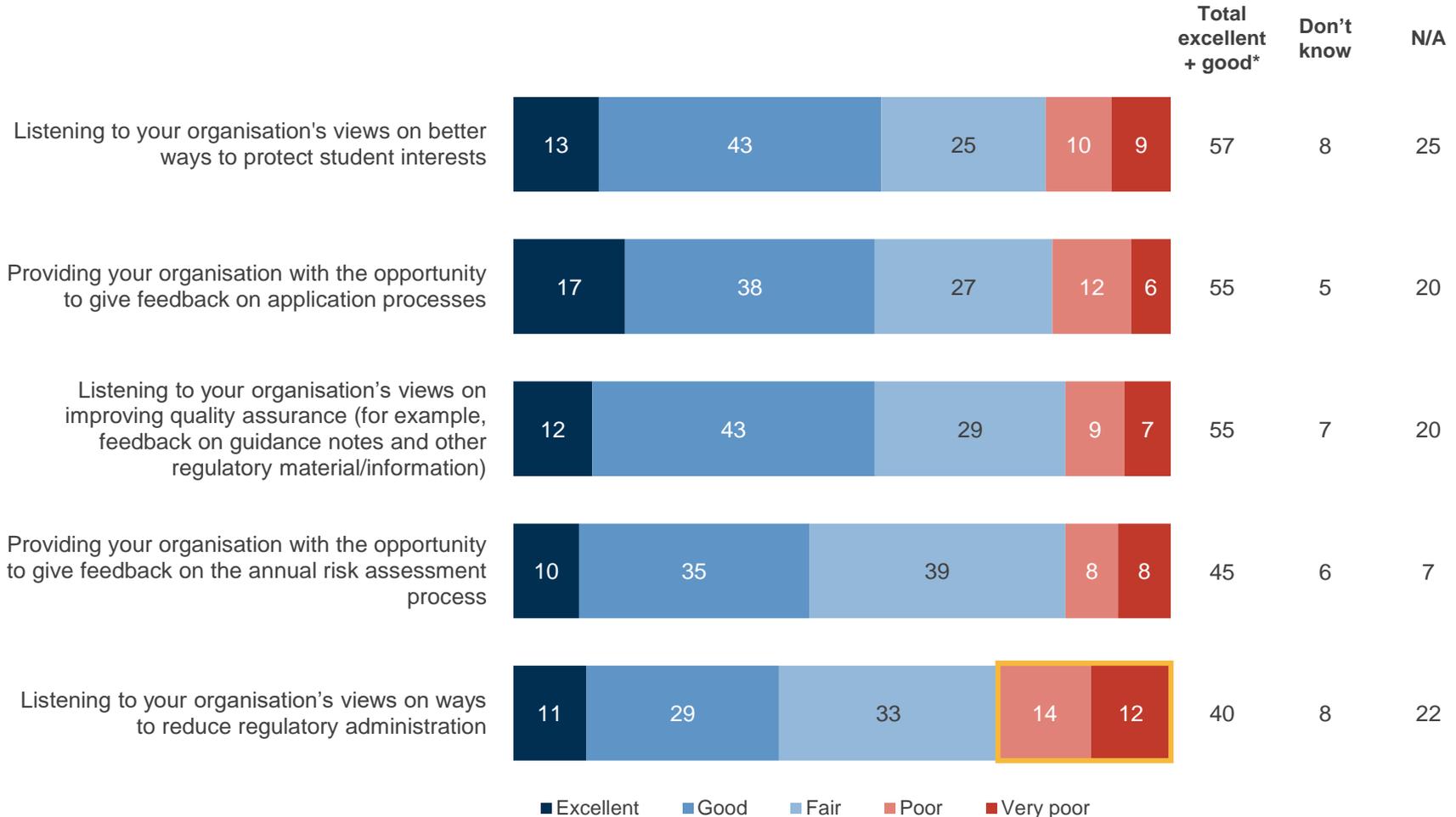
Listening to views on reducing regulatory administration is the lowest rated consultation metric

In the past five years, TEQSA's performance in listening to provider's views on ways to reduce regulatory administration has been poor and ranked as the lowest consultation metric. 'Excellent' or 'good' performance ratings on this metric have progressively declined since 2022 and have reached its lowest rating this year (40%). More than a third of providers (36%) rate TEQSA's performance in this area as 'poor' or 'very poor'.

Listening to organisations' views on better ways to protect student interests is TEQSA's top-rated consultation metric



Performance of TEQSA's consultation* (%)

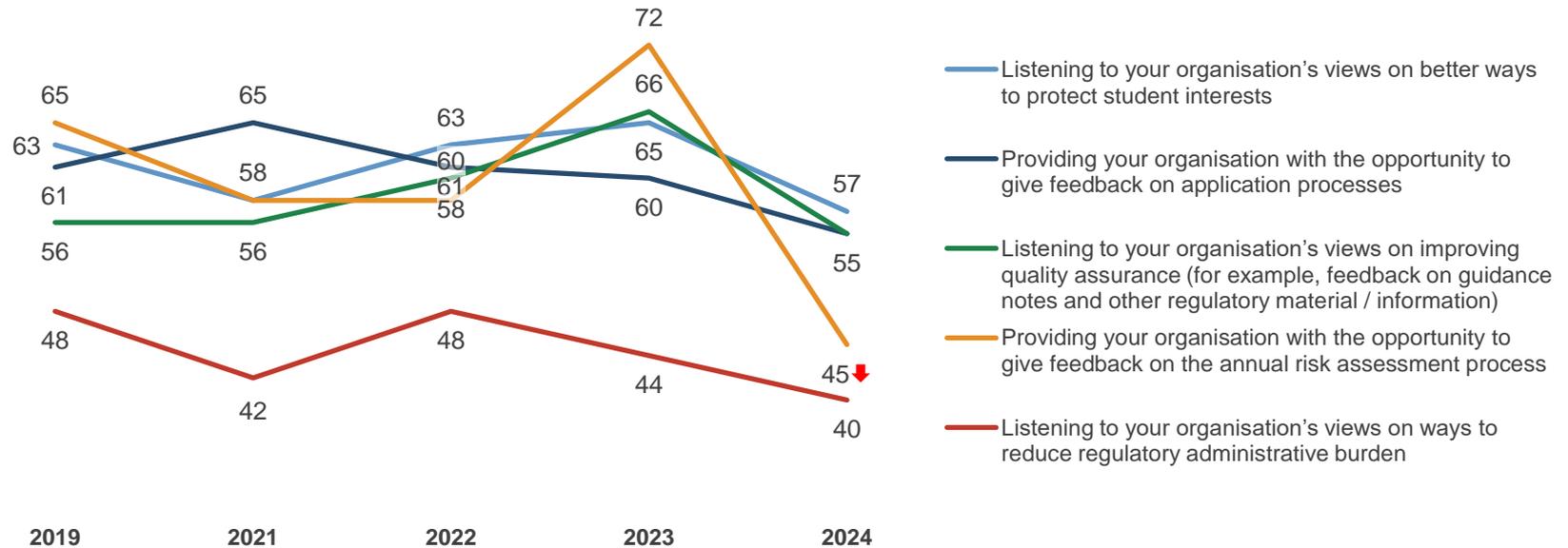


Q8. Thinking now about your organisation's individual interactions with TEQSA, how would you rate TEQSA's performance over the last 12 months?
 Base: All respondents (n=102).
 * Don't know and not applicable responses have been excluded from chart and 'Total excellent + good' calculation.



Consultation

Performance of TEQSA's consultation
(% Total excellent + good*)



Q8. Thinking now about your organisation's individual interactions with TEQSA, how would you rate TEQSA's performance over the last 12 months?

Base: Respondents who provided a rating – 2024 (n=69-89); 2023 (n=62-85); 2022 (n=67-89); 2021 (n=95-118); 2019 (n=92-126).

* Don't know and not applicable responses have been excluded from the 'Total excellent + good' calculation.

Significantly lower ▼ than the previous years result at the 95% confidence interval.



Many providers receive little to no interaction directly with TEQSA

As seen in previous years, there are large proportions of **providers who claim to receive little to no interaction** with TEQSA.

While they claim an ability to interact through their respective peak body, the direct consultation between TEQSA and providers is lacking. This is even cited by a newly registered provider, where it is envisaged greater consultation and engagement should be occurring.

This could be problematic as providers make assumptions about their progress and adherence to regulatory requirements which may not be the case.

“We have had almost no interaction with TEQSA in the past year except when they told us we had a new case manager. We can only assume this is a positive indicator that we are not in a high risk category in need of close monitoring.”

“We are relatively new provider so have not had much engagement with TEQSA teams to date.”

“Answering ‘not applicable’ responses means no engagement in the last 12 months.”

“There has been limited direct contact from TEQSA to organisations. Generally we are able to provide feedback through our industry body.”

For some, the lack of consultation extends to **a lack of response from TEQSA on issues raised** by the provider. This is frustrating for providers who are proactively seeking consultation with TEQSA and are not having this need fulfilled.

Further, there is little follow-up from TEQSA on feedback already provided and the outcomes of that feedback. Providers question the usefulness of these sorts of interactions when they are not progressed.

“TEQSA has repeatedly failed to engage with our institution on major concerns despite multiple requests.”

“There has been minimal to no direct communication initiated by TEQSA to our organisation.”

“There is no interaction unless instigated by our organisation.”

“Whilst there is a lot of consultation, we are unsure if and how the feedback we provide is being used and incorporated into TEQSA’s positions and advice.”

“While there is an opportunity to provide feedback, there seems to be a lack of proper engagement, discussion on this feedback, with TEQSA official still sticking to original view, even though statistical data/evidence is provided to support opposing view. This begs the question as to whether TEQSA is truly committed to engagement around this, as opposed to just lip service or being able to say there is opportunity for feedback.”



Cost recovery implementation



Section highlights: Cost recovery implementation

Information about fees and charges on TEQSA's website is largely well regarded

Two in three providers rate the usefulness of information available on TEQSA's website relating to fees and charges as 'excellent' or 'good' (66%). A further 30% of providers rate the usefulness of the website information as 'fair'. The usefulness of materials explaining how the registered higher education provider charge was calculated is rated in a similar manner (63% rate this as 'excellent' or 'good').

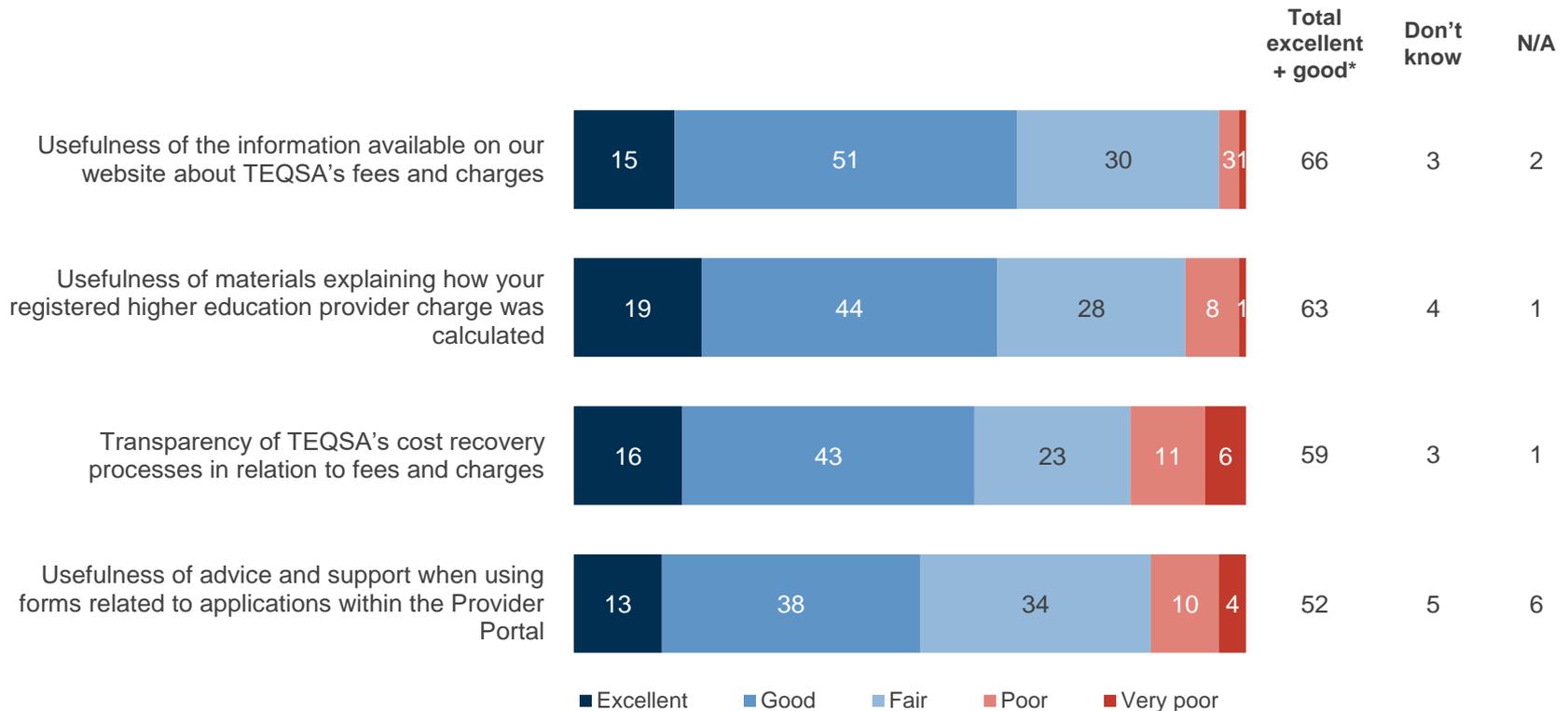
Advice and support offered remains less well rated

Just over half of providers (52%) rate the usefulness of advice and support when using forms related to applications within the Provider Portal as 'excellent' or 'good'. This is one of TEQSA's lower ranked metrics overall so attention may be warranted here (14% of providers rate TEQSA's performance as 'poor' or 'very poor').

Two thirds of providers rate the usefulness of information on TEQSA’s fees and charges as ‘excellent’ or ‘good’



Performance of TEQSA’s communications on cost recovery in the last 12 months* (%)



Q17. On 1 January 2023, TEQSA commenced the transition to increased cost recovery arrangements. TEQSA's cost recovery model, and its fees and charges, are set out in the agency's [Cost Recovery Implementation Statement \(CRIS\)](#). TEQSA's CRIS was updated, following consultation with the sector, in November 2023 with changes to fees and charges taking effect from 1 January 2024. Thinking about TEQSA's communications about cost recovery, how would you rate TEQSA's performance over the last 12 months in terms of:

Base: All respondents (n=102).

* Don't know and not applicable responses have been excluded from chart and 'Total excellent + good' calculation.



Regulatory activities and approach



Section highlights: Regulatory activities and approach

Ratings on some regulatory activities have declined

‘Excellent’ or ‘good’ performance ratings on some sector-wide regulatory activities are declining over time. The exception is ‘helping the sector as a whole to manage risks’ (up nine percentage points to 66%), although performance here has fluctuated over time. Fewer providers (46%) rate the ‘usefulness of advice and support in relation to the reduction of administrative regulatory burden’ as ‘excellent’ or ‘good’.

Performance in TEQSA’s regulatory approach varies among metrics

TEQSA’s ‘excellent’ or ‘good’ performance rating on half of the regulatory approach metrics increased from last year, with perceptions on the other half declining. Importantly, 81% of providers rate TEQSA as ‘excellent’ or ‘good’ when it comes to ‘treating you with politeness and respect’ and 68% consider TEQSA to be ‘fair and reasonable’.

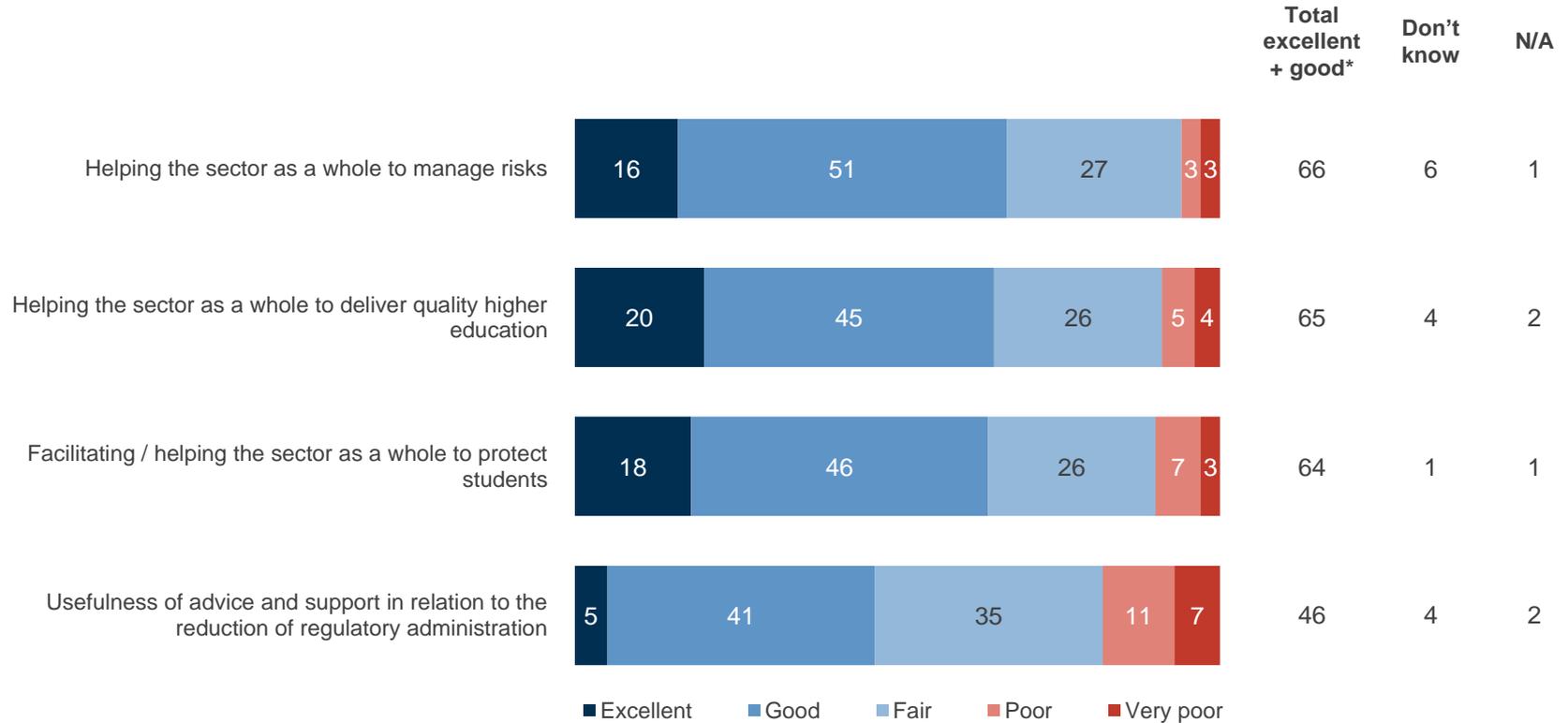
The time taken to make a regulatory decision has worsened

Provider perceptions in ‘minimising the time taken between applying and first receiving a regulatory decision’ have declined (30% rate it as ‘excellent’ or ‘good’). This is a ten percentage point decline from the period 2021 to 2023 where perceptions remained stable. In 2024, 42% of providers rate TEQSA’s performance here as ‘poor’ or ‘very poor’ – making it an area in need of attention. It is also TEQSA’s lowest rated metric.

Perceptions of TEQSA’s performance on regulatory approaches remain positive on a sector-wide basis



Rating of TEQSA’s regulatory activities over the last 12 months* (%)



Q9a. How would you rate TEQSA’s regulatory activities over the last 12 months for each of the following items:

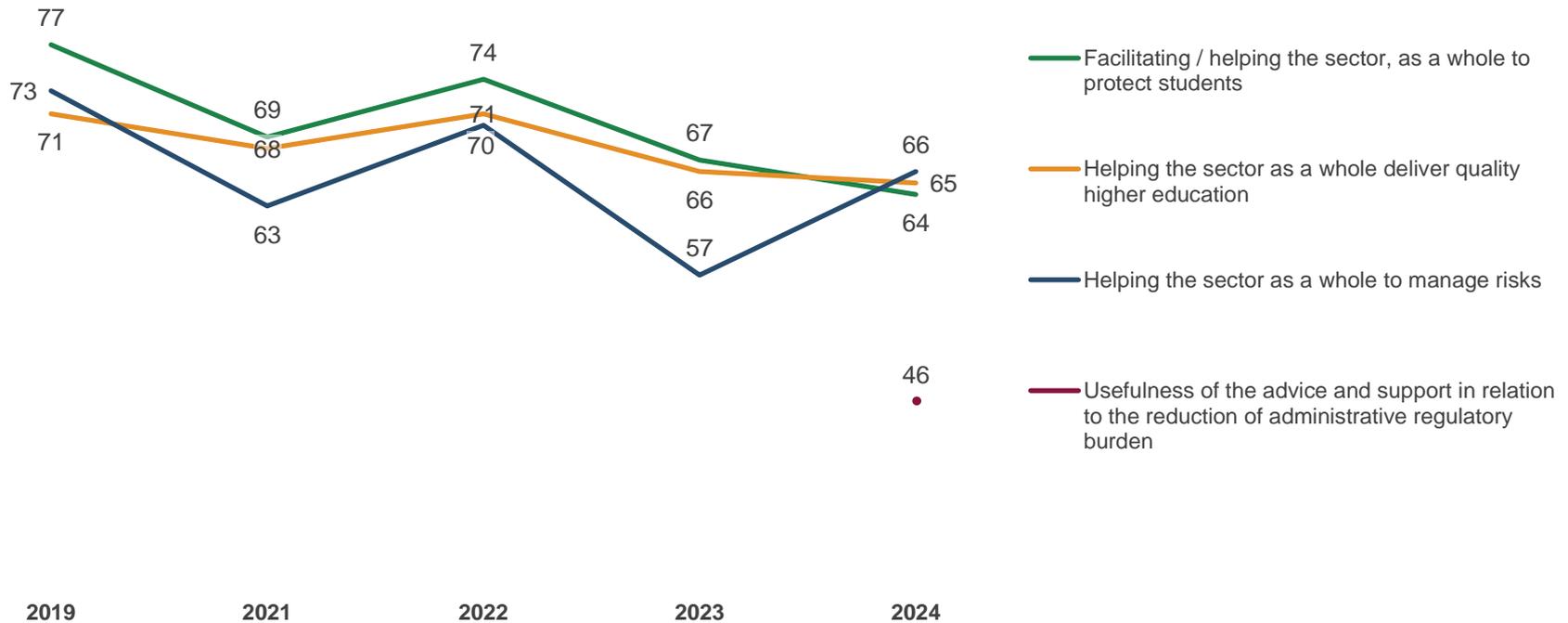
Base: All respondents (n=102).

* Don't know and not applicable responses have been excluded from chart and 'Total excellent + good' calculation.



Regulatory activities

Performance of TEQSA's regulatory activities
(% Total excellent + good*)

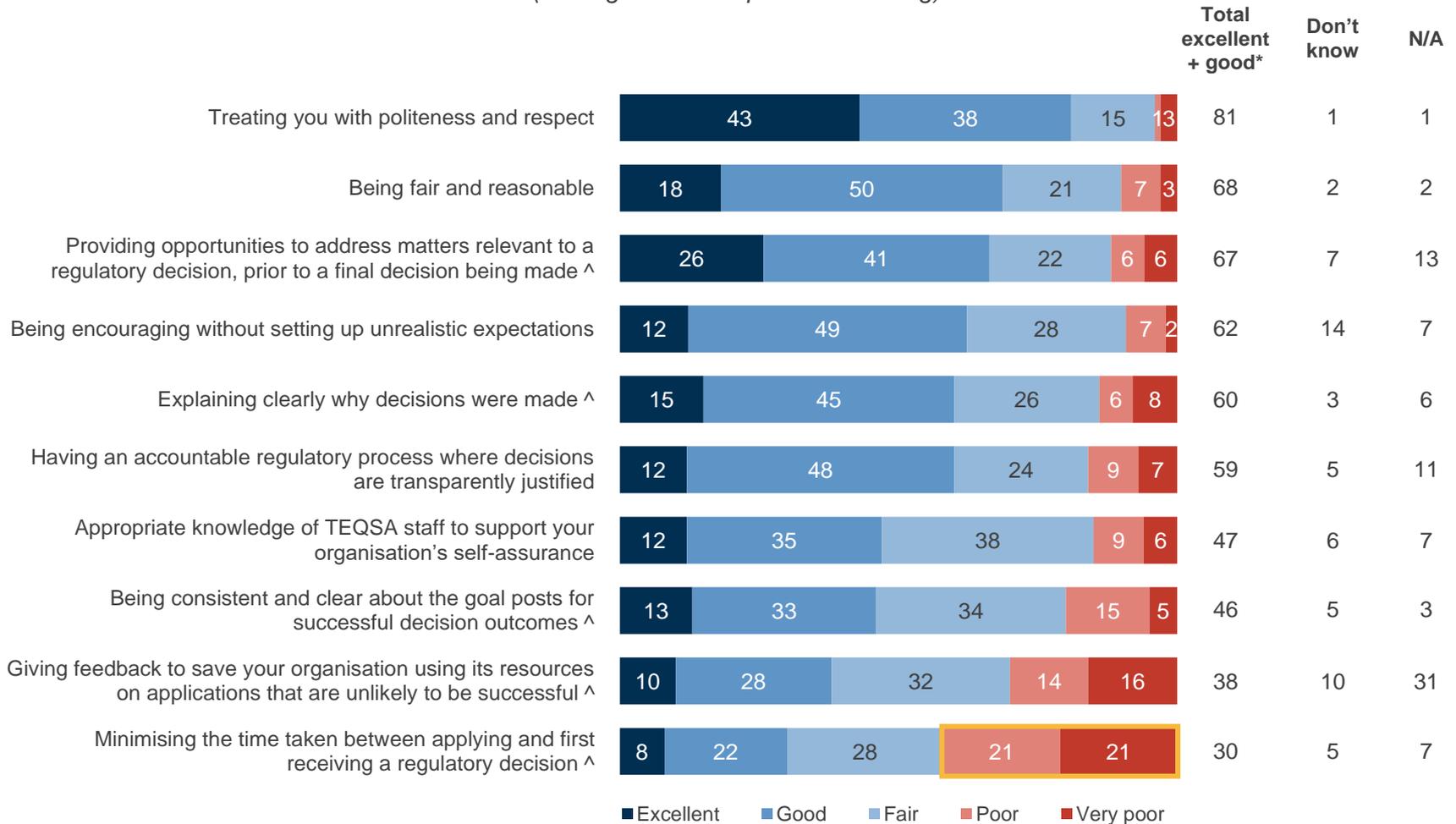


Q9a. How would you rate TEQSA's regulatory activities over the last 12 months for each of the following items?
 Base: Respondents who provided a rating – 2024 (n=95-100); 2023 (n=87-92); 2022 (n=91-95); 2021 (n=112-122); 2019 (n=127-136).
 * Don't know and not applicable responses have been excluded from the 'Total excellent + good' calculation.

Politeness and respect, and being fair and reasonable, are the best-rated regulatory approaches



Performance of TEQSA's regulatory approach over the past 12 months* (%)
(Among those who provided a rating)



Q9b. How would you rate TEQSA's approach over the last 12 months for each of the following items:

Base: All respondents (n=86-102).

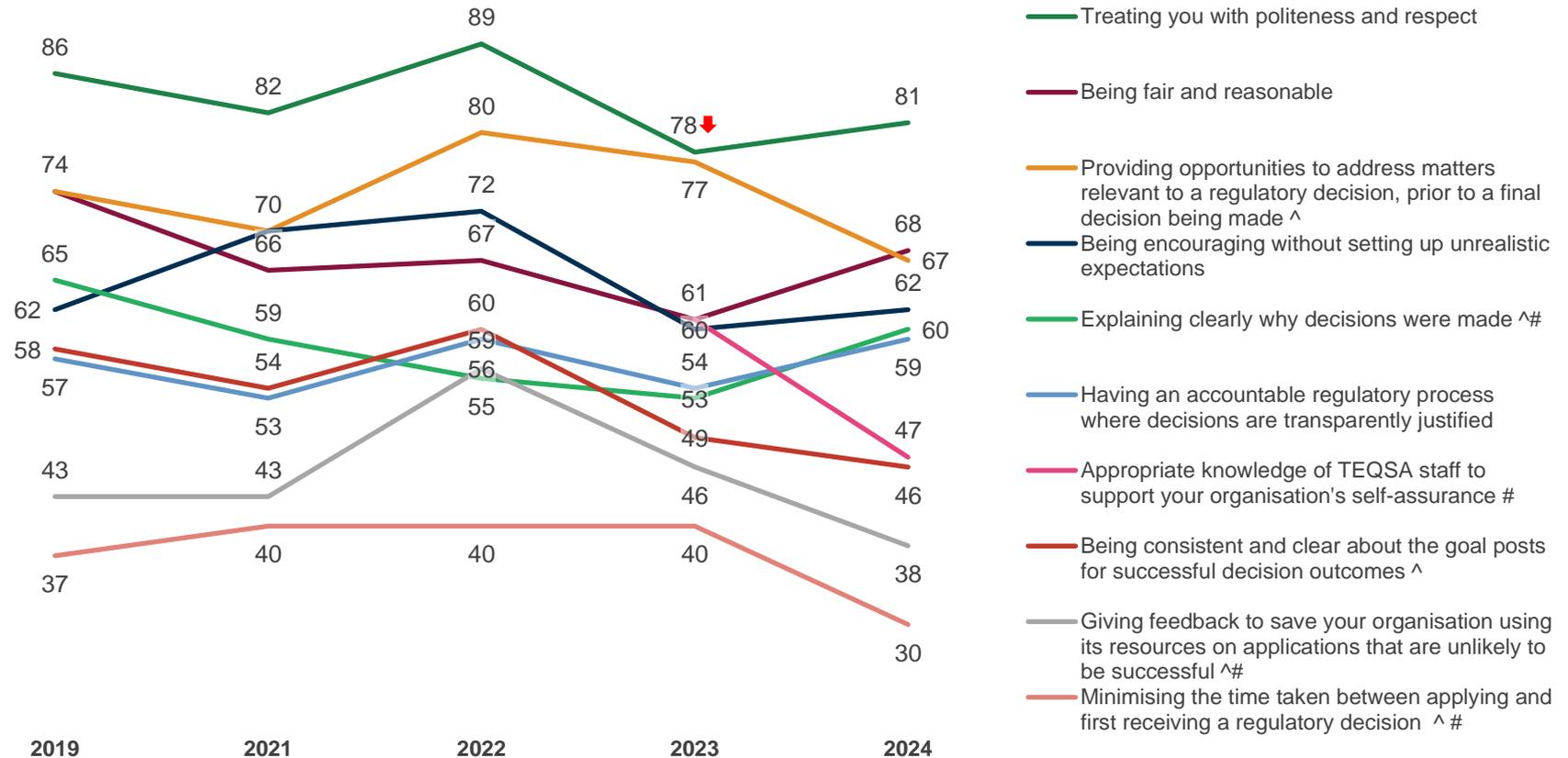
* Don't know and not applicable responses have been excluded from chart and 'Total excellent + good' calculation.

^ Indicates that the item was only asked of those who made an application.



Regulatory approach

Performance of TEQSA's regulatory approach
(% Total excellent + good*)



Q9b. How would you rate TEQSA's performance when carrying out its regulatory activities over the last 12 months for each of the following items:

Base: Respondents who provided a rating – 2024 (n=50-100); 2023 (n=50-92); 2022 (n=48-96); 2021 (n=58-125); 2019 (n=49-139).

* Don't know and not applicable responses have been excluded from the 'Total excellent + good' calculation.

Indicates wording change over time.

^ Only asked of those who made an application.

Significantly lower ▼ than the previous years result at the 95% confidence interval.



Timeliness and over-burdening process are the key issues

Timeliness of working through the regulatory process, along with a lack of feedback loops on decisions or engagements, continue to be the core areas of poor performance for TEQSA from a regulatory process point of view. These create added problems for providers and concerns about their ability to move forward.

“Processing time for renewal of registration is unacceptably long, with minimal communication about progress and expected completion time along the way. Delayed outcomes resulted in public questions regarding whether the [provider] had problems, which were unfounded.”

“There is little clarity or communication from TEQSA regarding our organisation’s progress on a Voluntary Undertaking based on the annual reports submitted. Why is it too hard for TEQSA to tell us whether they are satisfied with our progress?”

“The approach may be helpful and useful but when timelines blowout it is frustrating.”

“Application timeframes are too long, and there is a lack of communication and transparency about expected timeframes.”

Some also claim that additional administration is now creating an **over-burdensome** approach to regulatory processes. This is impacting on providers efficiency in going through a regulatory process (such as re-registration or accreditation).

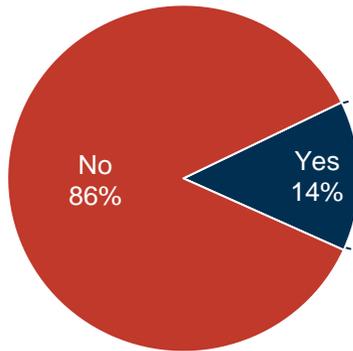
“We have been inundated with RFI/Compliance queries over the last 10 months and really over-burdened in that respect.”

“The revised ‘Add a Course’ CRICOS process has added to provider workloads and costs. In the past providers were able to manage multiple course additions in one application, whereas now each addition must be managed via a separate application form.”

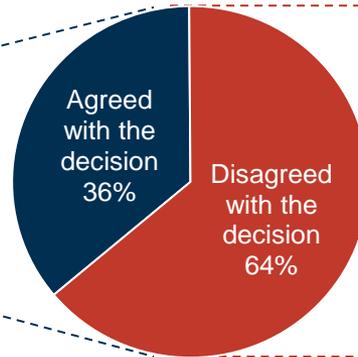
Fewer than 1 in 6 providers had an unfavourable regulatory decision in past year, but most disagreed with the decision



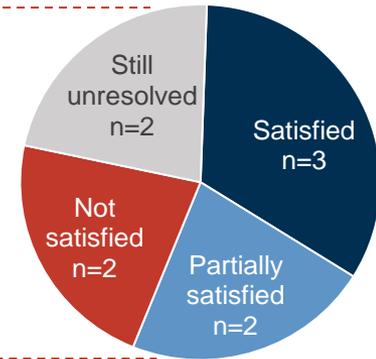
Unfavourable regulatory decision in the past 12 months



Reaction to regulatory decision*
(among those who had an unfavourable decision)



Satisfaction with steps taken to resolve differing views*
(among those who disagreed with unfavourable decision)



Steps taken to resolve the matter
(Sample of feedback from those who disagreed with the decision)

“Appealed through AAT and the decision was reversed.”

“Telephone conversation and emails.”

“I am currently applying for formal review of the cost recovery fees and the cost to re-register next year. No resolve to date.”

“Despite multiple attempts to negotiate with TEQSA which have been ignored, we have been forced to go to the Administrative Appeals Tribunal at enormous cost and wasted time. A simple phone call or meeting to discuss the concerns might have averted a huge waste of my institution (and TEQSAs) resources, but TEQSA refused to engage after multiple requests over multiple years.”

“Awaiting response following TEQSA requirement for external review that was provided by an approved (by TEQSA) external consultant.”

“Responded to an SoC.”

Q14d. Have you had a regulatory decision that was unfavourable to your organisation in the past 12 months? / Q14e. What was your reaction to this regulatory decision? / Q14f. What steps were taken to resolve this matter? / Q14g. How satisfied were you with the steps taken to resolve your and TEQSA's different views?
 Base: All respondents (n=101); those who had an unfavourable decision (n=14); those who disagreed with an unfavourable decision (n=9).
 * Caution small sample size (n<30).



Monitoring quality



Section highlights: Monitoring quality

Performance has increased in 'suggesting resources and networks' to providers

Perceptions of TEQSA's performance on 'suggesting networks and resources that your organisation might use to improve performance' has improved this year and is at its highest level in five years (58% of providers rate this area as 'excellent' or 'good'). However, it should be noted that a sizable number of providers (17%) continue to consider this area 'not applicable'.

Quality of feedback on adherence to standards shows some recovery

Almost half of providers (49%) rate TEQSA's performance in 'providing quality feedback on whether your organisation is meeting expected standards' as 'excellent' or 'good'. This is an uplift from 45% last year and halts a downward trend in perceptions evident from a peak of 60% in 2021. Further work is required to continue to lift perceptions here and return to the previously higher benchmark.

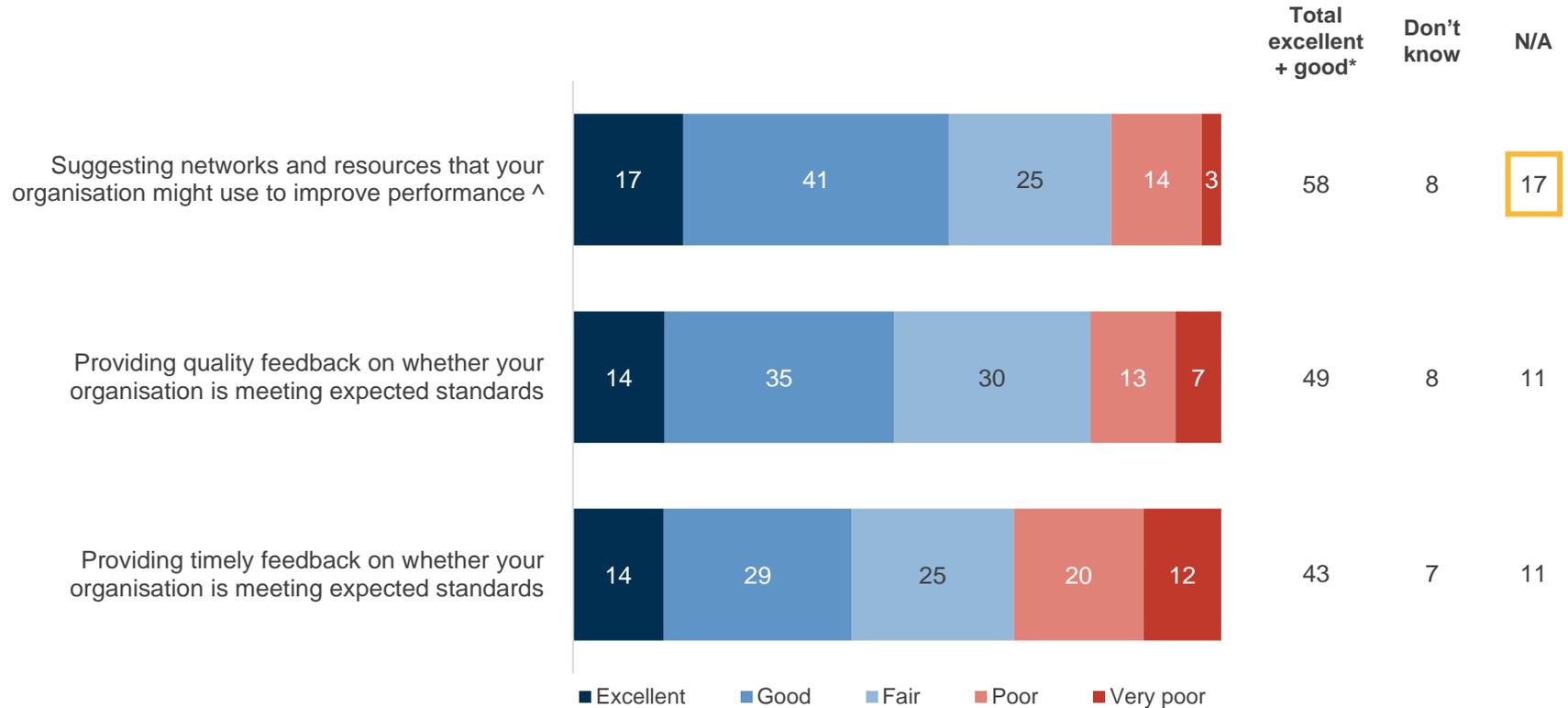
TEQSA's performance in providing timely feedback is yet to improve

Just over four in ten providers (43%) rate TEQSA's performance in 'providing timely feedback on whether your organisation is meeting expected standards' as 'excellent' or 'good'. TEQSA's performance in this area is unchanged over five years. In 2024, 32% of providers rate TEQSA's performance in this area as 'poor' or 'very poor'.

More than half of providers rate TEQSA’s performance on suggesting networks and resources as ‘excellent’ or ‘good’



Performance of TEQSA’s monitoring quality over the last 12 months (%)
(Among those who provided a rating)



Q10. How would you rate TEQSA’s performance over the last 12 months for the following:

Base: All respondents (n=86-102).

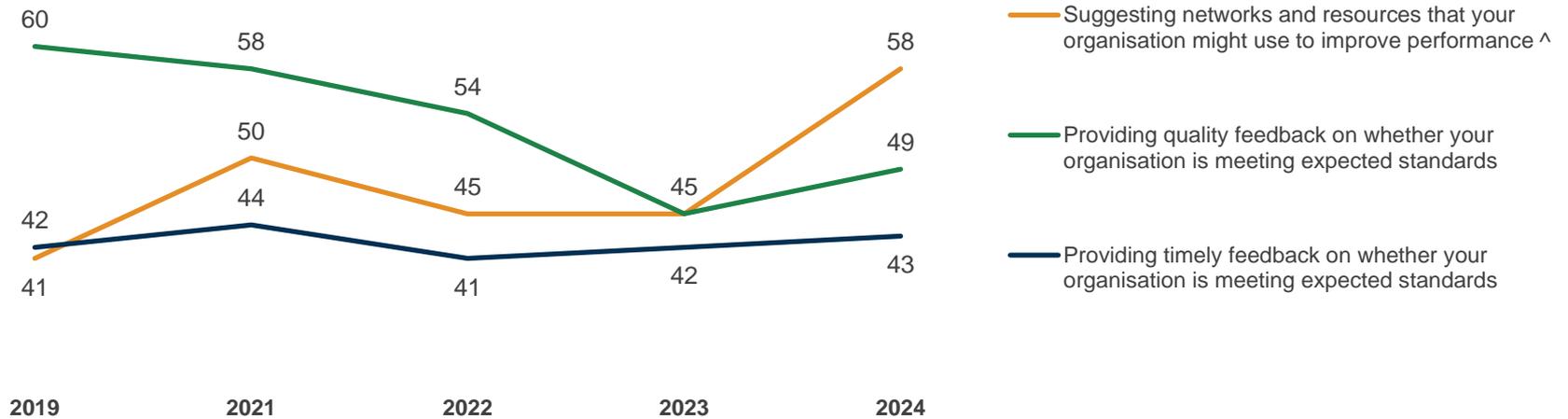
* Don't know and not applicable responses have been excluded from chart and 'Total excellent + good' calculation.

^ Those who made an application.



Monitoring quality

Performance of TEQSA’s monitoring quality
(% Total excellent + good*)



Q10. How would you rate TEQSA’s performance over the last 12 months for the following:
 Base: Respondents who provided a rating – 2024 (64-84); 2023 (n=65-80); 2022 (n=58-83); 2021 (n=91-92); 2019 (n=111-126).
 * Don’t know and not applicable responses have been excluded from chart and ‘Total excellent + good’ calculation.
 ^ Indicates that the item was only asked of those who submitted an application.



Applications



Section highlights: Applications

There is improved clarity in both TEQSA and CRICOS applications

In both TEQSA and CRICOS applications, perceptions of the clarity of the application guide (in being easy understand), and assessment scope and evidence requirements, have increased from last year. This is a positive result for TEQSA, and is a recovery of the declines seen last year, indicating improvement efforts have been realised.

Perceptions of the usefulness of application feedback are stable but should be considered

Close to two in three providers who completed a TEQSA application (64%) or a CRICOS application (65%) rate the usefulness of feedback on their application as 'excellent' or 'good'. Perceptions among providers who applied for CRICOS declined by 17 percentage points and are back in line with 2022 levels. Attention to this area is warranted to shore up TEQSA's performance here.

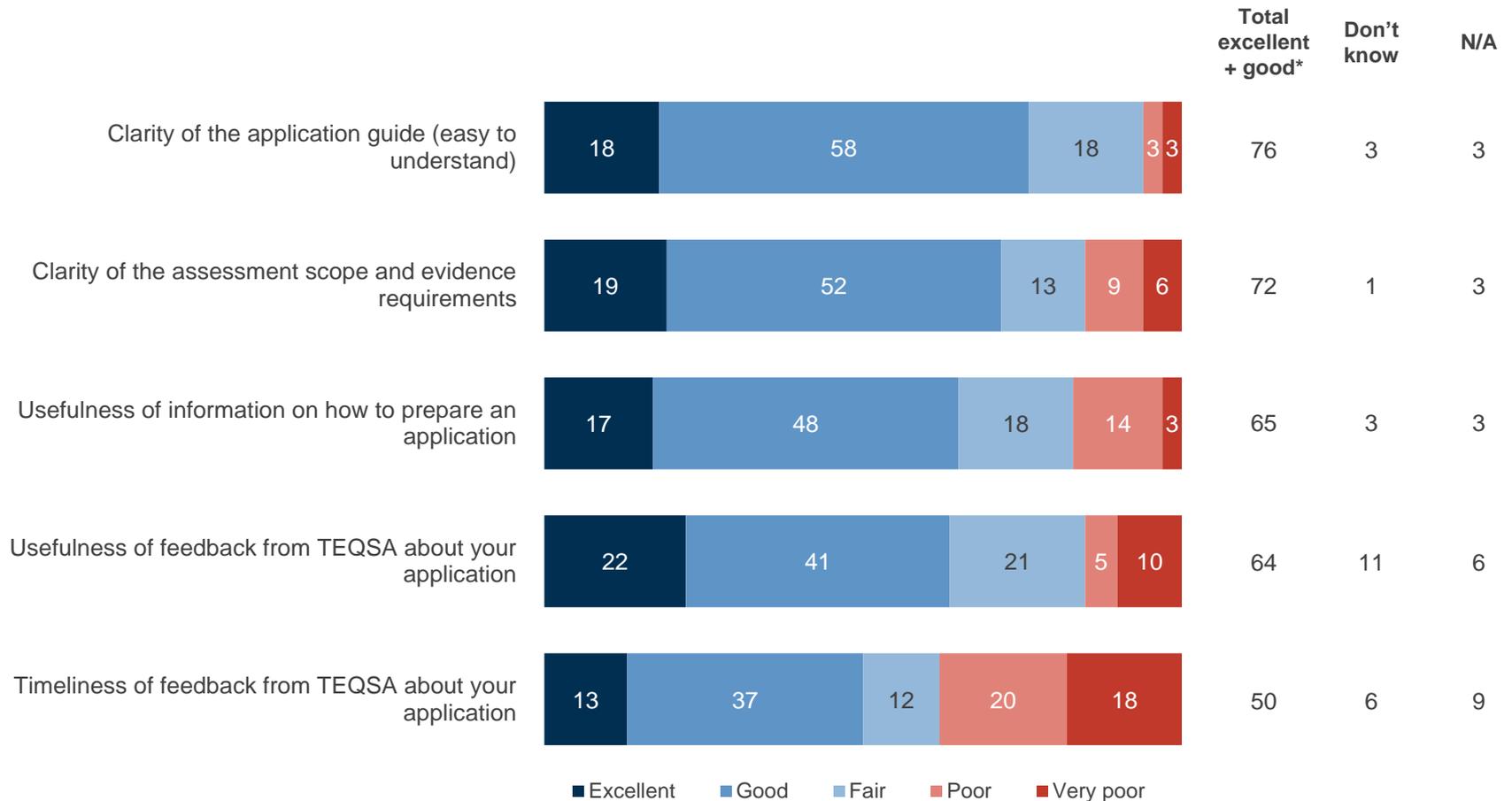
Timeliness remains lowest ranked aspect

Despite performance in the timeliness of feedback improving over time, it remains the lowest ranked metric among providers. Ratings of 'excellent' or 'good' among CRICOS applicants declined slightly from this year (from 65% to 63%) and improved among TEQSA applicants (from 46% to 50%). More than one in five providers rate performance in each area as 'poor' or 'very poor' (23% and 38% respectively).

Timeliness of feedback from TEQSA about TEQSA applications remains lowest rated aspect of the process



Performance of TEQSA's application process over the last 12 months* (%)
 (Among those who applied for TEQSA registration, accreditation and/or self-accrediting authority)



Q13. How would you rate TEQSA's performance over the last 12 months on the following aspects of the application process?

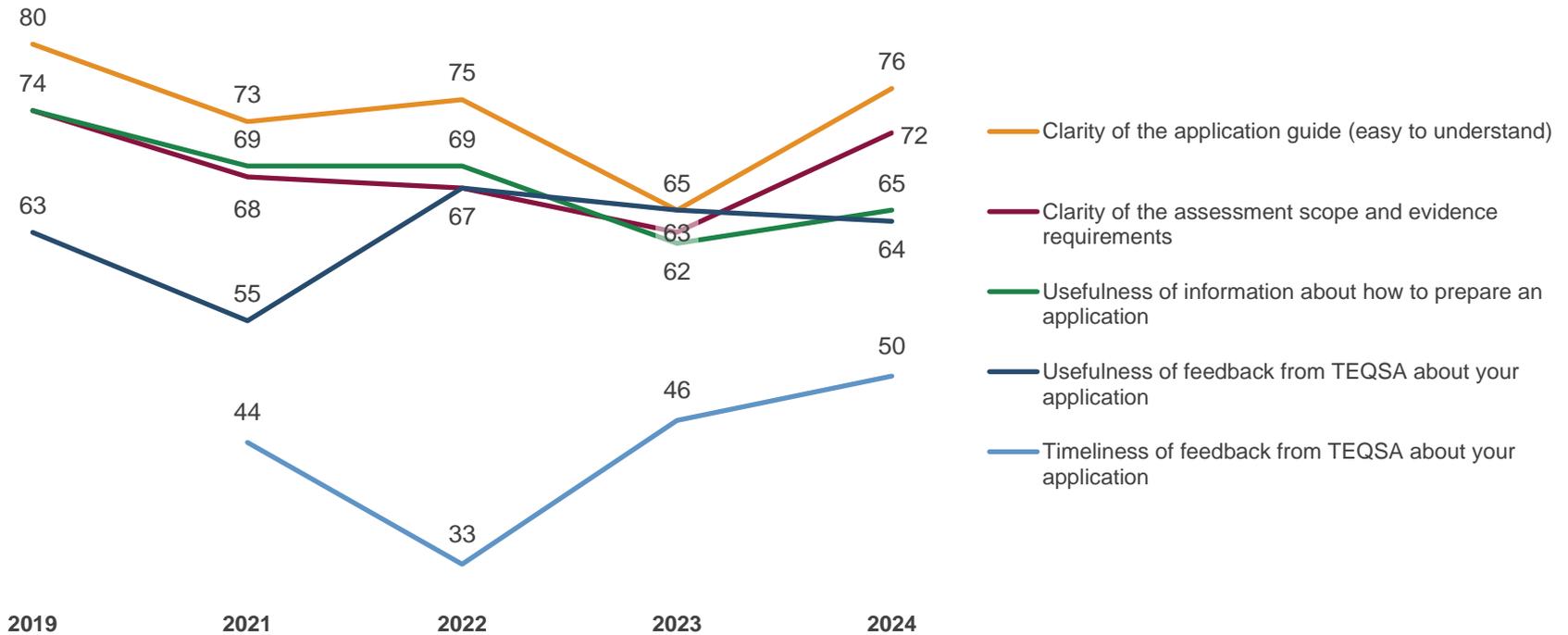
Base: Those who applied for TEQSA registration, accreditation and/or self-accrediting authority (n=70).

* Don't know and not applicable responses have been excluded from chart and 'Total excellent + good' calculation.



TEQSA application process

Performance of TEQSA's application process
 (% Total excellent + good*)
 (Among those who applied for TEQSA registration)



Q13. How would you rate TEQSA's performance over the last 12 months on the following aspects of the application process?
 Base: Those who applied for TEQSA registration, accreditation and/or self-accrediting authority – 2024 (n=58-67); 2023 (n=49-60); 2022 (n=45-51); 2021 (n=60-66); 2019 (n=68-84).
 * Don't know and not applicable responses have been excluded from chart and 'Total excellent + good' calculation.

Lack of timeliness for applications to be processed continues to be a core feedback theme among providers



While timeliness to receive feedback on applications has continued to improve (50% of providers in 2024 claim this to be ‘excellent’ or ‘good’), it is still an area of weakest performance for TEQSA. As in previous years, commentary around the **lack of timeliness** by TEQSA in processing applications and the lack of communication about the status of that application, adds frustration to the process for providers.

For some providers, it is the **lack of clarity** in initial documentation requests and/or further requests for information (RFI) that unnecessarily lengthen processing times.

“We applied for SAA in December 2022. No decision has yet been made.”

“At the time of completing this survey, no feedback had been received. Re-registration and reaccreditation for one course submitted 07/23 and another reaccreditation submitted 03/24.”

“We are still awaiting to receive our CET for provider re-registration. We have been actively following up our case manager but there is no contact initiated from TEQSA to advise on the status of this.”

“Application for re-accreditation extremely slow.”

“Overall, there has been a lack of transparency and proactiveness from TEQSA about the expected timeframes associated with the processing and assessment of applications post-submission.”

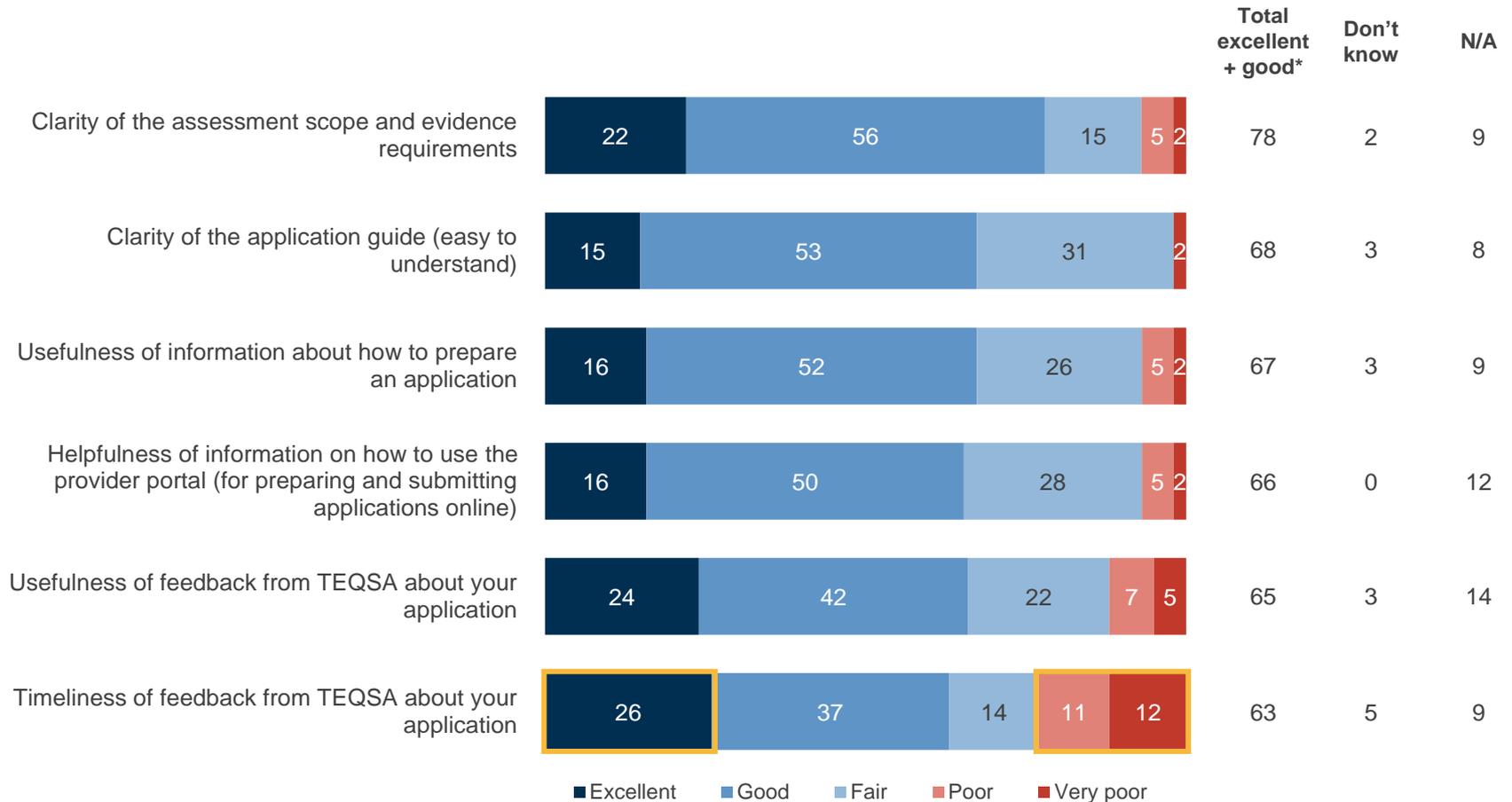
“Some evidence requirements that were requested to support course accreditation post-submission could have been made clearer in pre-submission documentation.”

“The CET [Confirmed Evidence Table] used is not very helpful in guiding an organisation on what a reviewer may seek to view and this can cause delays or unnecessary RFIs. If there is a guideline of what may be expected as good evidence for each section, then it would assist both organisations as well as external reviewers.”

Feedback on the timeliness of TEQSA’s feedback on CRICOS applications is mixed



Performance of TEQSA following CRICOS application process over the last 12 months* (%)
(Among those who applied for CRICOS)



Q13b. How would you rate TEQSA’s performance over the last 12 months on the following aspects of the CRICOS application process?

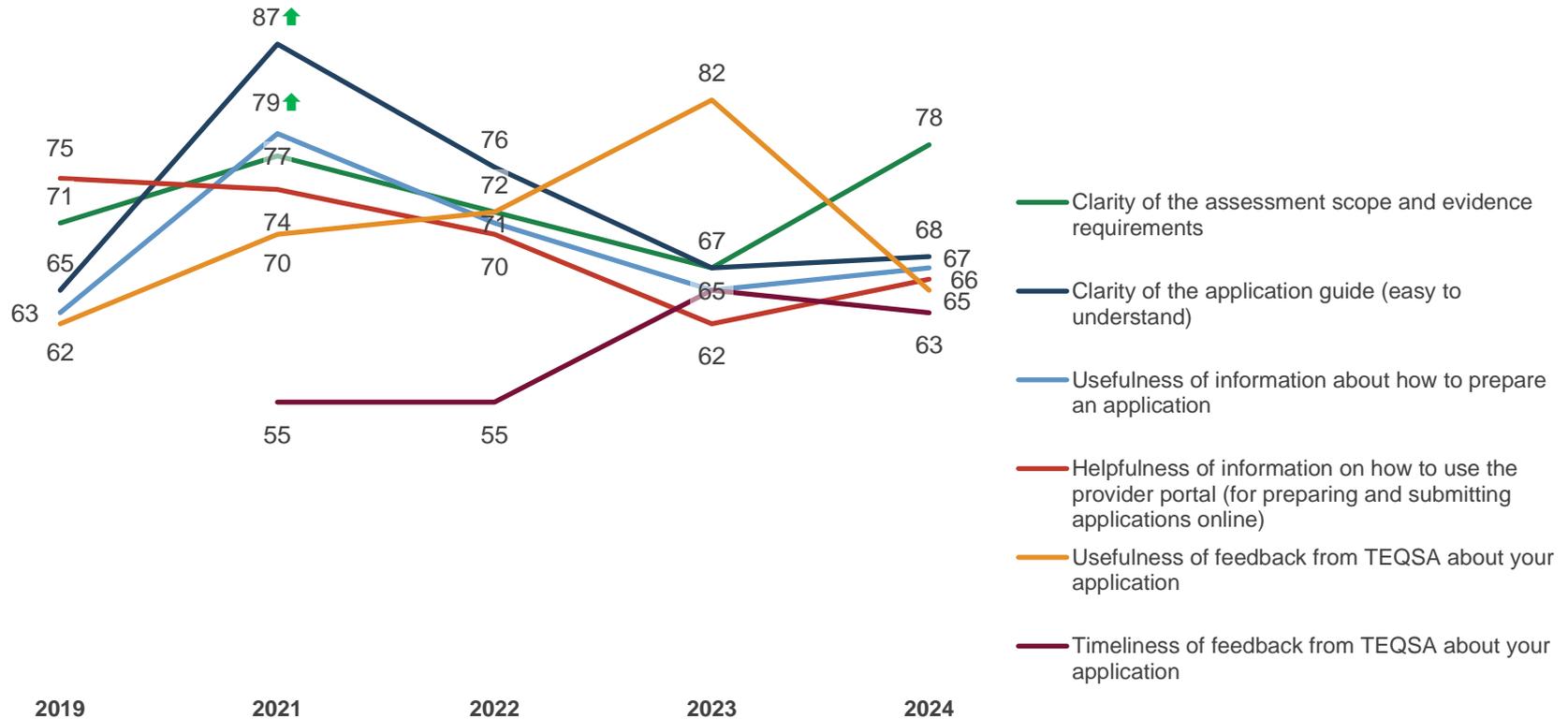
Base: Those who indicated they applied for CRICOS (n=66).

* Don't know and not applicable responses have been excluded from chart and 'Total excellent + good' calculation.



CRICOS application process

Performance of TEQSA's CRICOS application process
 (% Total excellent + good*)
 (Among those who applied for CRICOS)



Q13b. How would you rate TEQSA's performance over the last 12 months on the following aspects of the CRICOS application process?
 Base: Those who indicated they applied for CRICOS – 2024 (n=55-59); 2023 (n=38-49); 2022 (n=43-51); 2021 (n=67-69); 2019 (n=63-73).
 * Don't know and not applicable responses have been excluded from chart and 'Total excellent + good' calculation.
 Significantly higher ↑ than the previous years result at the 95% confidence interval.

Some issues remain around consistency between CRICOS and other applications



“The domestic TEQSA and CRICOS renewal of registration applications were vastly different in terms of their timeline required, scope and management of the application process. You can tell it is operated by two separate and distinct divisions of TEQSA. It would be great if these could be integrated for a more seamless experience.”

“We have been waiting for our CRICOS renewal for well over a year not. We are not a large institution, we receive invoices on time, but we have had zero updates on where this is up to.”

“Combine CRICOS codes together with approved applications, so there is no double handling on both sides.”

Some providers note inconsistencies between the processes around CRICOS accreditation and other applications as required by TEQSA.

This causes some frustration and also increases the workload of providers in delivering to accreditation requirements as well as timelines.

Some note that streamlining these two processes would be highly beneficial to delivering greater efficiencies for providers.



**Changes in the
last 12 months**



Section highlights: Changes in the last 12 months

Providers are not aware of changes in how TEQSA re-uses materials

Just under half of providers (49%) 'don't know' that they have noticed anything about TEQSA's re-use of material that their organisation has provided in the last 12 months. This is consistent with last year (48%). Beyond this, more providers (16%) believe that the re-use of materials has 'improved' than those who believe it has 'worsened' (1%).

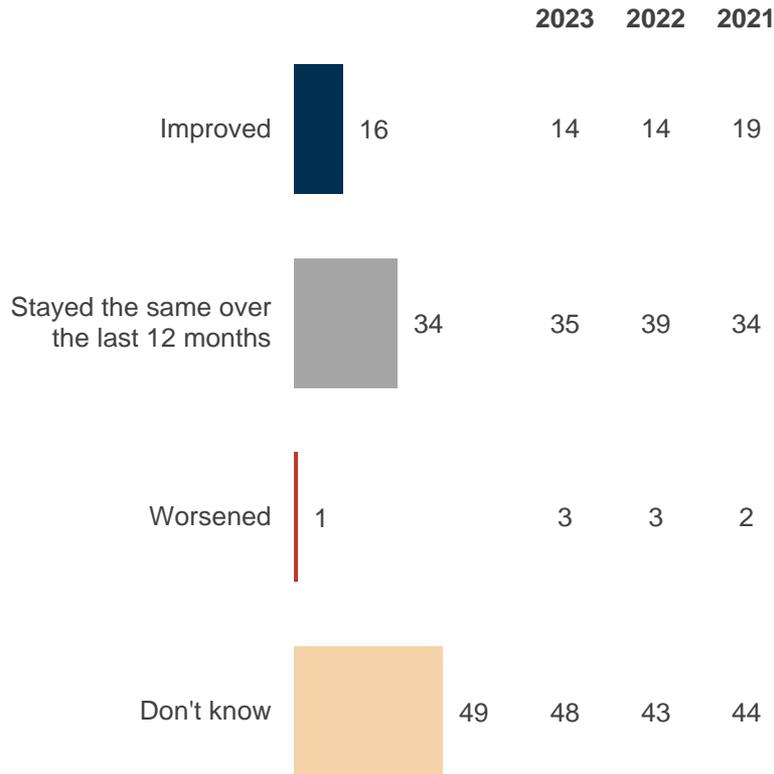
The administrative process errs toward improving

The majority of providers (56%) claim the regulatory administrative process has 'stayed the same' in the last 12 months. Those who say the administrative process has 'worsened' (10%) are fewer than those providers who say the process has 'improved' (16%).

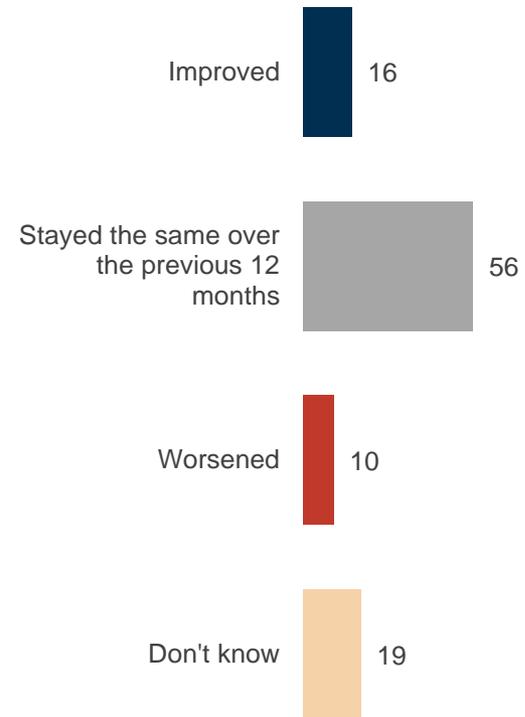
More providers believe the regulatory administrative process has improved than has worsened



TEQSA's re-use of material in last 12 months (%)



Regulatory administrative process required by TEQSA's regulations on organisation in last 12 months (%)



Q14a. In the last 12 months what have you noticed about TEQSA's re-use of material that your organisation has provided? One example is pre-filling of forms with previously provided information. / Q14b. In the last 12 months, what have you noticed about the regulatory administration process that TEQSA's regulations require of your organisation?
 Base: All respondents – 2024 (n=102); 2023 (n=95); 2022 (n=97); 2021 (n=126).

The most requested reporting requirement to be lifted is the PIR through TCSI



Some providers note that the additional reporting requirements through to other Government agencies outside of TEQSA is onerous.

In particular, some providers note the Provider Information Request (PIR) reporting, submitted via the Tertiary Collection of Student Information (TCSI) portal as being a pain point. There is a significant amount of detail required to be provided alongside a portal that is considered cumbersome to use. This is time consuming and an overall burden on their resources. Providers also question the value of having to provide such data.

Should TEQSA be in a position to streamline this in some way, it would alleviate a pain point among providers.

“TCSI is our biggest drain and concern (and not TEQSAs area).”

“Level of reporting detail required in the PIR can be reduced.”

“PIR staff data – the time to collate, review, submit takes months to complete – overly complex and questionable reliability given benchmarking data shown in risk assessment reports.”

“Improvement of the TCSI reporting system, it’s unreliable and time-consuming.”

“TCSI reporting as it is not user friendly and complicated.”

“Staff data reporting under the PIR assessment.”

“PIR staff data could be more efficiently managed within TCSI and provider risk assessments can be better streamlined.”

“Sending the monthly enrolment figures when we are not FEE-Help!”

Other requested lifts to reporting requirements centre on three broad areas



Current topical issues

The need for fortnightly reporting on issues such as the Middle East conflict, student wellbeing, artificial intelligence (AI) and cybersecurity are seen as unnecessary.

“The fortnightly reporting in relation the Middle East and staff and student wellbeing and complaints.”

“It is difficult to understand the cadence of some (probably externally required) reporting requirements (e.g. the new fortnightly requirement relating to Israel Palestine matters).”

“There are some reporting requirements that appear a little knee-jerk in their delivery, for example the RFI on AI. From our perspective, we have been aware of, and planning the potential impact of AI for more than 12 months.”



Financials

Given many are already regulated as a public institution, some of these requirements are frustrating to have to provide again.

“Financial reporting – we are government and not about to become insolvent. Time and reporting impost.”

“Liquidity ratio greater than one derived from financials provided at the same time.”

“Financial reporting.”



Annual PRAs

Provider Risk Assessments (PRA) appear to be somewhat redundant with outdated data.

“PRA needs to be improved. The data is lagged and static and not very useful. Questions raised by my organisation, haven’t been addressed.”

“The annual Provider Risk Assessment.”

“Annual Provider Risk Assessment process.”

Other issues mentioned include removing and/or streamlining reporting under a strong self-assurance model or administrative issues (e.g. not being able to provide hyperlinks but embedding a PDF of a website instead).



Sector risks



Section highlights: Sector risks

Cyber security is considered the sector's greatest risk

Just over seven in ten providers (72%) believe that threats of cyber security are a 'high threat' to the sector, with a further 25% perceiving it a 'medium threat'.

The threat of AI has grown beyond academic integrity

A similar proportion of providers consider 'the impact of generative artificial intelligence on the integrity of higher education awards' to be a high threat (71%), a further 25% consider this a 'medium threat'. Moreover, providers express concern about AI's impact in decreasing the worth and significance of higher education among students.

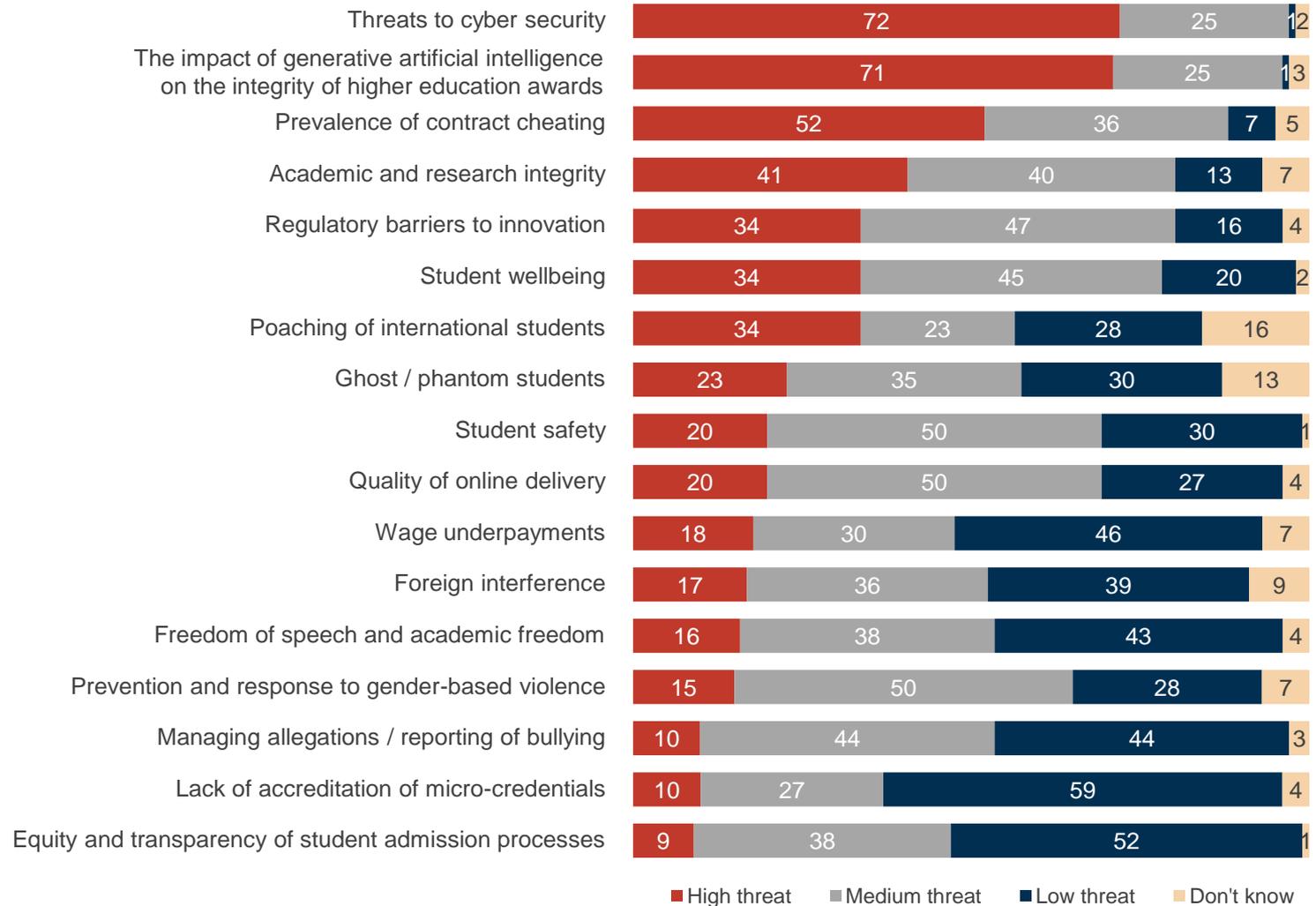
Providers also raise concerns about policy changes regarding international students

International students are crucial for the sector. The Education Services for Overseas Students Amendment (Quality and Integrity) Bill is cause for concern due to the many negative impacts it may create including reduced revenue, funding and resources. Visa processing delays for this cohort already affect providers. There is a strong need for guidance and/or assistance on this matter.

Seven in 10 providers think cyber security and impact of generative AI on integrity are high threats to the sector



Sector risk threat levels (%)



Q15. What level of threat do you think the following factors pose to the quality of the sector in coming years?
 Base: All respondents (n=101).

Providers are concerned about the impact of Government policy changes to the sector



Beyond the threats measured quantitatively, providers mention Government policy changes, namely the Education Services for Overseas Students Amendment (Quality and Integrity) (ESOS) Bill, as posing a high threat in the future.

- There are concerns that placing a cap on international student numbers will affect funding and revenue for the sector, particularly for smaller providers. It is perceived to affect Australia's global reputation in higher education, creating a ripple effect impacting resourcing and course delivery.
- Additionally in respect to international students, visa processing issues causing delays also pose an immediate or future threat.

Other concerns relate to:

- Generative AI: Providers are alarmed about its impact on academic integrity and the decreased value it places on higher education to students.
- Overregulation: Providers find it a burden and believe there are disparities between universities and independent providers.
- Declining quality of education due to a lack of innovation.

“The ESOS Amendment Bill 2024 poses an immediate threat to the higher education providers in favour of the universities, especially if utilised by the Minister of Education as a means to control immigration numbers rather than focusing on quality of higher education in Australia. Some of us may be stopped from introducing new courses which we have researched and planned for years, and our growth stunted due to limitation on the student recruitment numbers. This will be unfair to many of us if impacted.”

“Recent policy changes aimed at limiting the overall number of international students may result in a smaller funding pool for the higher education sector. This is likely to result in diminishing resourcing and eventually in the degradation of quality in the sector. This is an overall threat long term to the reputation and integrity of Australian qualifications.”

“May be outside of areas TEQSA can influence, but international student visa processing delays and restrictions are having a significant impact due to the dependency on international student fees in many institutions.”

“Generative AI is likely to pose the biggest threat to higher education and regulation as it can fundamentally change student perception about formal learning and its usefulness.”

“Overregulation, particularly the overlap of regulatory requirements from the Department of Education and TEQSA.”



Perceived strengths and weaknesses



Section highlights: Perceived strengths and weaknesses

TEQSA's resources are highly regarded

Providers find TEQSA's resources topical and informative regarding key issues the sector is facing at the time. Namely TEQSA's information sessions, workshops and guidance notes receive positive feedback. The resources have been proactively educational in topics such as generative AI and contract cheating. TEQSA's social media, e-newsletters and annual conference are also praised.

Providers suggest that TEQSA engage and consult more with providers

A suggested area for improvement is TEQSA's understanding of the differences both between and within universities and institutes of higher education. Providers express that there is diversity in the sector and within each of the two groups. Continued consultation and engagement will allow TEQSA to better recognise and address provider issues.

The issue of long response times an ongoing pain point

Feedback from providers indicate that TEQSA must address and resolve the long response times when it comes to updates on queries, applications and decision making. The inefficiency diminishes perceptions of TEQSA's reputation and reliability. Providers are aware that a lack of resources and/or difficulties with staff turnover can impact response times but feel a solution needs to be found.



Perceived strengths and weaknesses of TEQSA

Strengths – what TEQSA does well

- Providing educational resources such as guidance notes, workshops and information sessions on specific topics.
- Communicating regularly and updating providers via media channels.
- Arranging access to case managers for personable advice.
- Holding the TEQSA Conference.

Opportunities – what TEQSA should do more

- Audit to eliminate providers who are non-compliant.
- Engage more with institutes of higher education and participate in the Higher Education Quality Network to better understand issues staff are facing.
- Have on-going relations between case managers and providers.
- Be involved with the Government regarding the impacts of political decisions on the sector.

Weaknesses – where TEQSA could improve

- Response times and timely updates, particularly on applications and decision making.
- Staff retention – providers note a high turnover among case managers and seek updates relating to changes.
- More consultation with and consideration of varying providers to better understand diversity in the sector.
- Website and portal user experience.
- Streamline processes to reduce administrative tasks and create efficiency for TEQSA and providers.

Threats – what should TEQSA stop doing

- Applying a one-size-fits-all approach to all providers.
- Holding the conference in the same format each year.
- Having long turnaround times for applications.



Select verbatim responses: Strengths and opportunities

What TEQSA does well?

“The National Register is a well-maintained resource. It is also good to see more regular activity and opportunities for engagement via email, LinkedIn, webinars, guidance notes, and good practice repositories on the TEQSA website.”

“Case managers have been personable and provide reasonable advice.”

“Continuous and regular social media posts to update stakeholders and provide guidance.”

“Stakeholder engagement – TEQSA maintains strong relationships with higher education providers, government bodies and other stakeholders. This collaboration fosters a supportive regulatory environment and encourages continuous improvement and innovation within the sector.”

“Organise TEQSA Conference and other events.”

“Communicating with HEPs directly to manage issues.”

“Communicating the sectors challenges and risks, alerting providers with academic integrity risk, provision of supporting resources, good practice guides.”

“TEQSA workshops and information sessions are timely and informative.”

What should TEQSA be more involved in?

“A regulator must maintain an arms length from its regulatees to avoid capture, but it may be worth exploring models where, for example, TEQSA staff are permitted to attend sector events, conferences, professional development etc, to gain a more immersive, first-hand experience of the issues the sector and its staff are dealing with.”

“Bringing together subject matter experts from providers to discuss and inform changes; participating in networks such as the Higher Education Quality Network.”

“Ongoing conversation with a case manager and the provider rather than at times that are required for registration or when there is an RFI.”

“Continue to develop a consultative approach to institution management.”

“Maintain focus on non-compliant providers.”

“Do a random audit of the institutions.”

“Consultant to government on the impact to the sector of political decisions.”

“We expect TEQSAs active involvement and guidance in the specific implementation of caps on international students to ensure the sustainable development of higher education providers.”



Select verbatim responses: Areas for improvement and things TEQSA should stop doing

Where could TEQSA improve?

“TEQSA’s policies promise a level of relationship with providers that its standing resources cannot deliver. TEQSA should clarify its approach and stop failing to deliver in terms of timelines for processes.”

“There has been a significant shift in staff, lots of delays in communication (especially developing good relations between TEQSA and unis).”

“Improve its process efficiency and reduce administrative burdens on higher education institutions by streamlining regulatory processes and reducing time required for compliance and accreditation / reaccreditation procedures. [Adopt] more agile and technology-driven methods for data collection, reporting, and communication.”

“The website is often difficult to navigate with embedded hyperlinks. Superseded pages should be retained for reference, but greater clarity to direct users to more current pages would assist in obtaining current information.”

“Timeliness of application processing. Improved communication regarding changes in personnel.”

“Being more connected to the sector to understand the diversity that exists across and even within providers.”

What should TEQSA stop doing?

“TEQSA should stop making its conference more and more academic in nature. TEQSA is a regulator, not an academic. There are so many academic conferences but few/none on regulation, risk, compliance and governance in our sector. The sector needs to understand more about these matters, not about academic matters. The annual conference is the perfect opportunity.”

“Should not have the same format for TEQSA conference every year.”

“TEQSA should stop applying a one-size-fits-all approach to regulation and compliance.”

“Uniformly applying rules for big and small providers, not taking into account that there are start-ups with good intentions but need time to scale up operations.”

“Taking a long time to assess courses and related submissions.”

“Should respond in confirmed time frame.”

“Long application times, RFIs and SoCs with long lead times that are vague but then TEQSA insists on being specifically critical and prescriptive when it suits them.”

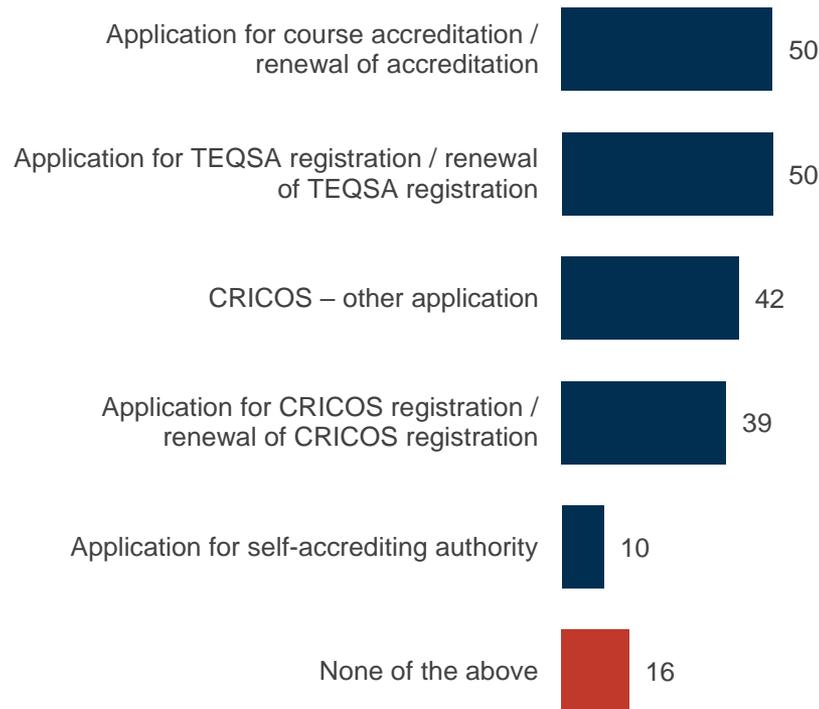


Appendix: Interactions with TEQSA



Nature of interactions with TEQSA

Interactions with TEQSA in the last 12 months (%)
(Multiple response allowed)



**THERE ARE
OVER 200
TEQSA
REGULATED
PROVIDERS
IN AUSTRALIA...**

**FIND OUT
WHAT THEY'RE
THINKING.**



Contact us
03 8685 8555



Follow us
[@JWSResearch](#)

John Scales
Founder
jcales@jwsresearch.com

Mark Zuker
Managing Director
mzucker@jwsresearch.com

Katrina Cox
Director of Client Services
kcox@jwsresearch.com

Issued: 26th June 2024



J W S R E S E A R C H