

TEQSA Provider Survey 2022 Research report

Prepared for the Tertiary Education Quality Standards Agency (TEQSA)

July 2022

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Background, objectives and methodology

Background and research objectives



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

TEQSA's annual stakeholder consultation has been conducted each year since 2015-16 to gain insights into stakeholder views on the agency, its regulatory output and approach to risk. The annual survey also informs strategic initiatives in relation to continuous improvement, sector-wide risk management and stakeholder engagement. The results of past surveys have informed targets within the Regulator Performance Framework (RPF) and TEQSA's Corporate Plan as a measure of meeting key objectives.

Due to the significant challenges that TEQSA-regulated entities were facing in 2020 with the COVID-19 pandemic, stakeholder consultations were conducted via focus groups with institution peak bodies only.

The stakeholder consultation returned in 2021 via an online survey with providers. This year again, TEQSA sought to gain insights into providers' views on the agency's performance, in addition to potential and/or emerging sector-wide risks.

TEQSA engaged JWS Research as an independent market research provider to conduct and analyse results of their annual stakeholder survey.

The key objectives of the research are to increase TEQSA's accountability, better understand its impact on higher education providers, and to improve its performance. Specifically, the analysis provides:

- Insights into TEQSA-regulated entities' views on the agency's performance.
- An evaluation of how TEQSA is performing against Key Performance Indicators (KPIs).
- Identification of potential and/or emerging sectorwide risks.
- Input into how the results can be translated into strategic initiatives.

Results will also be used to inform TEQSA's 2022 annual report.

Research methodology





Unique contact details for n=200 primary contacts of TEQSA-regulated providers were provided by TEQSA.

JWS Research emailed a link to the survey to the n=200 stakeholders for whom an email address was supplied, providing for an attempted census. Valid email addresses were available for n=195 of these stakeholders.

n=97 primary contacts each from different organisations, including universities, Institutes of Higher Education and Non Higher Education providers, completed the survey, providing a response rate of 51%, meaning the survey captured the views of 51% of TEQSA regulated providers.

- Three reminder emails were sent to maximise participation in the survey.
- The maximum margin of error on the total sample of n=97 is +/-7% 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.
- Vice Chancellors and CEOs of providers were not surveyed in 2022, unless they were the primary contact.
- In 2022, analysis by provider category is based on the new provider categories introduced on July 1, 2021, and comprised n=29 Universities, n=66 Institutes of Higher Education and n=2 Non Higher Education Providers.

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

Conducted 3rd June to 1st July, 2022.

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



Executive summary

Executive summary



TEQSA's overall performance continues to be highly rated



Three quarters (76%) of providers rate TEQSA's overall performance as either 'excellent' or 'good'. Views have not changed since 2019.

Providers remain appreciative of TEQSA's conduct throughout COVID-19. The establishment of the Integrity Unit and TEQSA's work on contract cheating are new points of praise this year.

Performance on most individual KPIs is either relatively steady or improved

Perceptions of most individual KPIs have either recovered or stabilised after declines in 2021.

Relatively strong improvements were observed among:



'Regulatory actions undertaken by TEQSA are proportionate to the risks being managed' – 64% rate TEQSA performance on this metric as either 'excellent' or 'good' – an improvement of 9% since 2021. This gain recovers what was lost in 2021 and takes the top two box rating of this metric to a series high.



'Compliance and monitoring approaches for higher education providers have been streamlined and co-ordinated' – 52% rate TEQSA performance on this metric as either 'excellent' or 'good' – an improvement of 7% since 2021.

'Regulation by TEQSA does not unnecessarily impede the efficient operation of higher education providers' (Impact B) – 55% this year, also up 7% on the 2021 result. TEQSA's reframed impact however (Impact A – Upholding quality standards with a proportionate approach to managing risks and supporting the sector to comply and improve) continues to rate better (70% – unchanged from 2021).

Despite both above metrics having recovered most ground lost in 2021, the top two box for both measures remains lower than the peak achieved in 2016.

One KPI metric is trending downwards



In contrast, one KPI has suffered consecutive years of decline:

'Continued improvement in regulatory framework in consultation with your organisation' – 46%, declining a significant 14% since 2021 and 7% between 2019 and 2021. The top two box rating is now at a series low.

Executive summary (cont'd)



Communication and information provision remains the areas where TEQSA performs best



On most measures, seven in ten (or more) providers rate TEQSA's performance as either 'excellent' or 'good'. TEQSA is most well-regarded in guidance and good practice notes.

On only two metrics, *six* in ten providers rate TEQSA's performance as either 'excellent' or 'good':

- 'The usefulness of TEQSA facilities workshops and webinars and discuss regulatory requirements and quality issues'; and
- the 'usefulness of the TEQSA 2021 conference'.

Providers have expressed a desire to have more inperson webinars and information sessions. There is a view that the need for online forums is now dissipating.

TEQSA continues to rate lowest on timeliness



Of all metrics evaluated, TEQSA's performance is rated lowest on aspects of timeliness:

• 'Timeliness of feedback from TEQSA about your application' (33% believe TEQSA's performance here is either 'excellent' or 'good').

- 'Minimising the time taken between submitting an application and first receiving a regulatory decision' (40%).
- 'Providing timely feedback on whether your organisation is meeting expected standards' (41%)

Performance perceptions on the aforementioned lowest rated metrics have not improved over the past year.

Implementation of new Provider Category Standards well received

Almost two thirds of providers (65%) rate TEQSA as either 'excellent' or 'good' on this metric, making it the top rated consultation measure this year.

While a majority of providers consider TEQSA's performance on most feedback opportunities and processes as 'excellent' or 'good', this year there are an increased proportion of 'not applicable' or 'poor' ratings on many consultation items. Some providers do not recall their feedback being sought.

Again this year, the only consultation measure where less than a majority of providers rate TEQSA's performance as either 'excellent' or 'good' is '*listening to your organization's views on ways to reduce regulatory administrative burden'* (48%).

Executive summary (cont'd)

Regulatory processes and activities

TEQSA's conduct in relation to its regulatory activities remains a strong point and is the highest rated metric of all evaluated:



89% of providers rate TEQSA's performance on treating them with politeness and respect as 'excellent' or 'good'.

Consistent with 2021, TEQSA's regulatory performance is perceived to be stronger on a sector-wide basis, as opposed to helping and strengthening an individual organisation's capacity.

TEQSA's performance on 'helping your organisation deliver quality higher education' declined significantly in 2021 and has not recovered in 2022.

Monitoring quality

The timeliness of TEQSA feedback on whether an organisation is meeting expected standards remain poorly rated. This has been the case for several years.



Perceptions of the *quality* of TEQSA's feedback on this matter continues to fare better, though a downward trend may be emerging (60% rated performance here as either 'excellent' or 'good' in 2019, 58% in 2021, and 54% in 2022).

The proportion of providers who rate TEQSA's performance on 'suggesting networks and resources that your organisation might use to improve performance' as either 'excellent' or 'good' dropped below 50% this year – to 45%.

Perceptions of the CRICOS application process more positive compared to the TEQSA process

The most stark difference in perceptions of TEQSA's performance on *both* application processes is in relation to timeliness:



- 55% consider the timeliness of feedback from TEQSA about their application as either 'excellent' or 'good' in relation to the CRICOS application process
- Just 33% say the same when it comes to the TEQSA application process.

That said, timeliness of feedback is the least well rated aspect of both the application processes.

Executive summary (cont'd)



Fewer providers have had a change to their case manager in the past 12 months, compared to 2021

Despite this, ratings of case management aspects relating to understanding the needs of individual organisation's continue to rate lower.



Communication with case managers remains highly valued. The annual health check phone call is appreciated (66% rate this as 'excellent' or 'good').

It is suggested that more frequent and more personal communications with case managers would help providers feel better understood. Case managers and TEQSA staff with higher education sector knowledge is considered vital to providers feeling understood.

Perceived threat of international border closures halved



In 2022, 39% of providers consider international border closures to be a 'high threat' to the sector...

... in 2021, it was 85%.

The implications of prolonged border closures however are apparent.

Cyber security considered the greatest sector threat in 2022



Two thirds of providers (66%) rate cyber security as a 'high threat'.

Contract cheating remains a threat



Half of providers consider contract cheating to be a 'high threat' to the sector (55%). The proportion of providers who consider this issue a high threat has been incrementally increasing since 2019.

That said, TEQSA's work on combatting the issue and the introduction of the Integrity Unit is applauded by providers.

Threat of regulation impeding innovation also increasing



Just over four in ten providers (44%) rate regulatory barriers to innovation as a high threat to the sector. In 2019, 33% said the same and in 2021, 40% did.

Considerations and opportunities



Attempt to improve timeliness

Timeliness aspects continue to rate lowest of all areas evaluated. Views of TEQSA's performance relating to timeliness are not improving and in some case, they are deteriorating. Progress updates are suggested as a way to mitigate some of the timeliness issues.

A renewed focus on continuous improvement

Views on TEQSA's performance in 'continued improvement in regulatory framework in consultation with your organisation' are declining in contrast to other metrics.

Sector knowledge is important

Providers want to feel that TEQSA and their case managers have an understanding of their business needs. There is a view that staff turnover has resulted in some loss of sector knowledge within TEQSA, which is considered important to be able to effectively assist and regulate the sector.

Desire for inperson interactions to resume To assist in making providers feel better understood, there is appetite for TEQSA representatives to visit institutions in-person. The 'usefulness of TEQSA-facilitated workshops and webinars to discuss regulatory requirements and quality issues' has also been declining. Some providers are wanting more in-person engagement.

Ensure regulation does not impede providers

The perceived threat of 'regulatory barriers to innovation' is increasing. The role of TEQSA is appreciated, though providers want to feel supported as well as regulated. There is a view that innovation in education needs to be discussed (and embraced) and considered in the regulatory framework.





Section highlights: KPIs and overall performance



TEQSA's overall performance continues to be highly rated

Consistent with the previous two evaluations, three quarters of providers (76%) rate TEQSA's overall performance as either 'excellent' or 'good'. TEQSA's flexibility during COVID-19 and approach to dealing with contract cheating and academic integrity are key points of praise. Despite a strong overall performance rating, staff turnover at TEQSA is frequently mentioned as being a concern, among other things.

High performing areas are consistent and there are improvements in others

Again this year, around seven in ten providers rate TEQSA's communication and upholding of quality standards performance as either 'excellent' or 'good'.

Perceptions have improved in risk approach, compliance and monitoring and Impact B (Regulation by TEQSA does not unnecessarily impede the efficient operation of higher education providers). Approach to risk ratings are now at their highest point.

Declining performance on continuous improvement

Perceptions of TEQSA's performance on continuous improvement have declined for the second year in a row. The decline this year has been statistically significantly, taking the KPI's rating to its lowest point since 2016. There appears to be a desire among some primary contacts for TEQSA to play a more active role in improving the sector.

Summary of KPIs



Total excellent + good (%)*







Approach

Continuous improvement



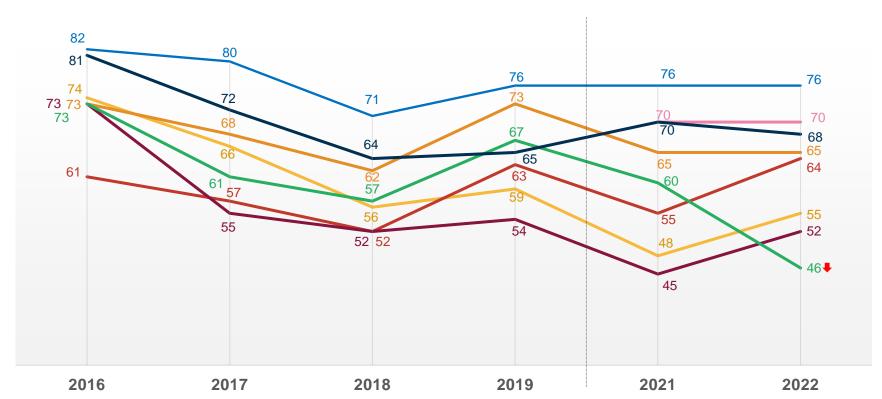
Compliance and monitoring



(B)

Impact (A)

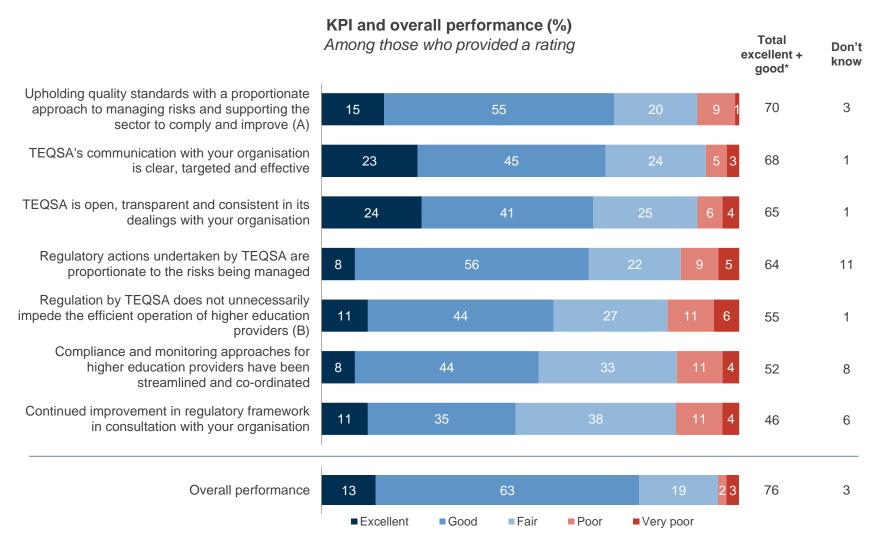




Don't know responses have been excluded from the 'Total excellent + good' calculation. Please note that in 2020, the annual TEQSA Stakeholder Survey was not conducted. Please note that 'Impact A' was a new KPI metric in 2021. Significantly lower • than the previous years result at the 95% confidence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

Perceptions of KPI and overall performance





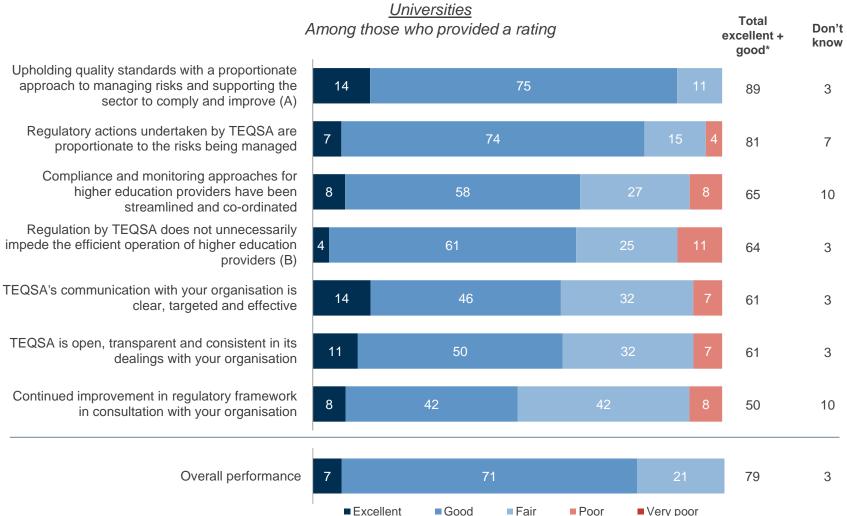
Q1. Please rate TEQSA's performance over the last 12 months on each of the following indicators / Q. How would you rate TEQSA's performance over the last 12 months as the regulator assuring the quality of Australian higher education Base: All respondents (n=97).

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

Perceptions of KPI and overall performance among universities



KPI and overall performance (%)

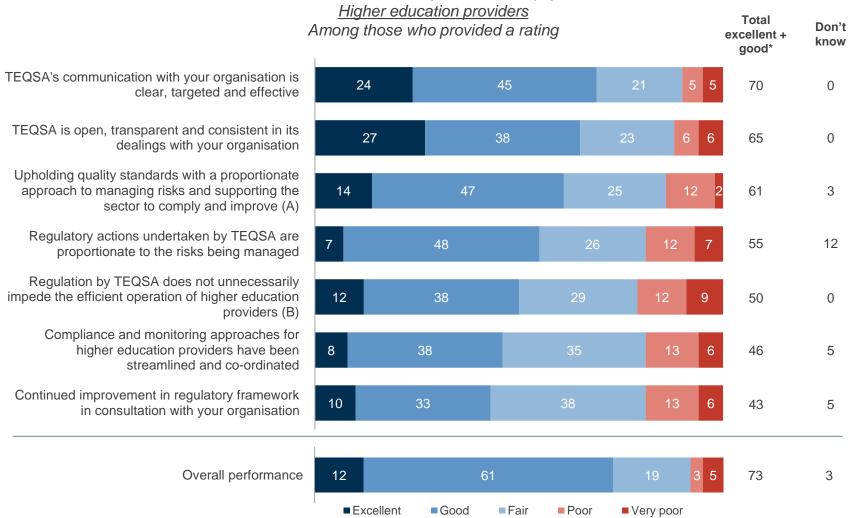


Q1. Please rate TEQSA's performance over the last 12 months on each of the following indicators. Q. How would you rate TEQSA's performance over the last 12 months as the regulator assuring the quality of Australian higher education Base: Universities (n=29).

Perceptions of KPI and overall performance among <u>higher</u> <u>education providers</u>



KPI and overall performance (%)



Q1. Please rate TEQSA's performance over the last 12 months on each of the following indicators. Q. 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=66).

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

Positive comments are made relating to COVID flexibility but there are some concerns in other areas



When given the opportunity to provide feedback on TEQSA's KPI performance, TEQSA flexibility during COVID-19 continues to be recognised and appreciated. Some believe there is an opportunity to extend flexibility offered or formalise it.

Communications and engagement efforts receive specific praise, reflected by the fact that TEQSA's communication is consistently one of it's highest rated KPIs. That said, many providers feel that TEQSA has a high turnover of staff which can inadvertently affect relationship building with case managers.

Beyond this, concerns mentioned relate to:

- Cost recovery
- Aspects of fairness
- Inconsistency
- Duplication of requirements
- Timeliness.

There is a view among some providers that TEQSA's treatment of providers is disproportionate to the size of the provider and number of students enrolled. Cost recovery concerns are sometimes linked to this.

Others mention they are dissatisfied with the time TEQSA takes to either respond to providers, or the time frames given to providers by TEQSA.

"TEQSAs flexible approach during the recent difficult period for providers due to pandemic impacts and border restrictions has been appreciated and has allowed for a reduced regulatory burden on providers."

"TEQSA is encouraged to draw lessons from the impact of COVID and flexibility on international student policy requirements, considering what level of flexibility might be extended or formally integrated in policy."

"It has been difficult to obtain any information on the cost of reaccreditation for our organisation. It is also unclear whether the cost recovery scheme starting next year will consider the size of higher education organisations. It seems unfair to not make the cost correlate to student numbers."

"TEQSA don't seem to take the same proportionate response to regulating universities compared to small private providers. For example, I would think that universities (both public and private) have a much greater impact and influence (and therefore risk) on the reputation of Australia's higher education sector, yet some are very loosely regulated and seem to be allowed to adopt and maintain very poor practices in governance, academic quality assurance and third party provision."

"I do not feel TEQSA is always consistent or proportionate in relation to risk in its actions. It seems too frequently to adopt a onesize-fits-all approach."

"The Federal Government has imposed more regulatory functions on TEQSA than originally envisaged, which does result in unnecessary double-handling across Government."

Select verbatim comments: Primary contact personal comments on TEQSA's performance



"Overall, I am pleased with the relationship that I have with TEQSA. That is not to say it is always smooth sailing or there are things I would like to see improve or change. TEQSA is an important cog in the HE wheel. I really like the case manager model."

"The Integrity Unit is excellent. The last year has seen a number of issues fail to progress (cost recovery, risk framework, guidance, revisions to the regulatory approach). The lack of contact with the case manager is a noticeable and unwelcome change in recent years. Significant changes to staffing have no doubt added to TEQSA's challenges but we do hope for a better year."

"The Annual Provider Health Check is a great way of engaging with Providers. Case Managers are really helpful." "It would be beneficial if case managers can be contacted by phone for quick questions or informal advice." "Well intentioned. Polite. Helpful. But secretive. Lacking an ability to make clear decisions. No is the automatic response due to fear of making a poor decision."

"The major risk to TEQSA seems to be culture and staff turnover. So much sector knowledge has departed over the last 12 months. Does TEQSA have a plan to turn this around?" "TEQSA's support in managing the ongoing impacts on institutions of COVID-19 is appreciated. High staff turnover and team restructures have been frustrating, particularly changes in case managers."

"As a contact for a provider with a sustained low risk profile, the relevance of TEQSA from a day to day operational perspective is secondary to internal drivers for continuous improvement that is orders of magnitude above TEQSA assessments. In this context, it is important to think critically about what TEQSA could do to add value to the institution, and sector as a whole. On a positive note, TEQSA has responded to new powers and responsibilities around contract cheating and academic integrity very very well and can do many things that individual providers cannot do themselves. TEQSA is encouraged to consider how it might leverage the capability and insight it has in the contract cheating space to add value to other aspects of the sector. On a personal level, I'd like to see TEQSA play a more active role in identifying and promoting good practice. To my mind, it too often plays a straight bat on base level compliance issues, rather than nurturing a sector-wide ethos of continuous improvement well above satisfying base requirements of the threshold standards."

"There needs to be more opportunity going forward for genuine engagement, not just being talked at by TEQSA commissioners and staff as seems to be the case in e.g. the conference." "TEQSA seems to be going through significant staff turnover at all levels. This has impacted providers negatively. Changes in case managers and their supervisors, steep learning curve as new employees learn the regulatory environment and the contextual / provider specific factors – these are significant challenges."

"Worked wonderfully well during the pandemic. Very flexible and accommodating. Now it may be going back to the bad old days of long delays and heavy-handed regulation."

"Our relationship is cordial, but TEQSA is very much a regulator rather than an industry improver."

Staff turnover said to impact relationship building and TEQSA's sector knowledge



There is a view among many providers that TEQSA is experiencing a high proportion of staff turnover.

Providers do sympathise with TEQSA and sometimes hypothesise that COVD-19 has exacerbated the issue, though they do appear to struggle with the perceived frequent changes.

There is a belief that frequent change in staff or lack of staff impacts the timeliness of TEQSA's response. Some providers perceive TEQSA to be 'overloaded' with work due to staffing issues.

Others feel that there has been an increase in staff at TEQSA with little sector knowledge, which appears to make it difficult for providers to feel understood.

Changes in case managers can also affect relationship building. Some providers feel as though they do not have enough opportunity to build a longer-term, mutual understanding with their case managers. "There still appears to be a high turnover of staff at TEQSA. There were some changes that related to our organisation that we heard third hand rather than directly. That said, any interactions have been positive and prompt. It feels that TEQSA is still overwhelmed by the workload with some matters taking longer than anticipated but have not impacted our organisation. Hopefully, like with many of us, 2022 is the year that we can all get back on track!"

"The staff are excellent but I think under resourced leading to high turnover of case managers."

"We have had positive interactions with TEQSA in the last 12 months and have no real view of TEQSA's performance, however, the change over of staff does have an impact on the rapport-building aspect with TEQSA, but this is relevant to all business, not just TEQSA."

"It has been noted that TEQSA may have lost some staff that come from a HEd, or university academic, management of HE professional background. It is our view that TEQSA continue to employ staff at case management level who are from the sector and understand how HEd providers operate."

"The changes in case managers are difficult in that just as you have a good working relationship with someone who knows and understands your institution, they move on and you have to start over again. Where new case managers are not from the sector and not familiar with the HESF, that most of us have been working with since 2011, it can be a bit more challenging to develop the relationship-seeking advice from someone without the same knowledge level."



Overview

Section highlights: Overview



Information provision and TEQSA's conduct is where it performs best

Comparisons across all of TEQSA's individual metrics evaluated show that provision of information (good practice and guidance notes) and polite and respectful treatment of providers is where TEQSA is most positively rated. Usefulness of information provided and meetings or phone calls with case managers are also strong points of TEQSA.

Measures relating to timeliness remain TEQSA's lowest rated areas Timeliness issues relating to provision of feedback from TEQSA about a TEQSA application, the time taken between submitting an application and first receiving a regulatory decision, and feedback on whether an organisation is meeting expected standards are the greatest areas of concern.

In the main, Universities remain more complimentary than other providers Consistent with 2021, on most measures evaluated, including overall performance, universities rate TEQSA's performance higher than other providers. Universities and Institutes of Higher Education align in their views when it comes to the top and low performing areas.

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 to which the individual metric relates.

Communication
Consultation
Regulatory processes and activities
Monitoring quality
Applications
TEQSA's case management

Total (excellent + good)*

The way TEQSA treats providers and good practice and guidance notes is where TEQSA performs best



	Performance (%) (Excellent + good)*		Universities	Institutes of Higher Education
Treating you with politeness and respect		89	89	88
Usefulness of the information on the HES Framework (Threshold Standards) 2021 in the form of the guidance notes		88	93	86
Usefulness of the information contained within the good practice notes		87	96	83
Providing opportunities to address matters relevant to a regulatory decision, prior to a final decision being made		80	71	82
Usefulness of information on TEQSA's regulatory policies and processes - provided through TEQSA's website and newsletters		79	93	73
Usefulness of meetings and / or phone calls with your case manager		77	75	77
Clarity of the application guide (easy to understand) (CRICOS)		76	71	77
Usefulness of information provided on the National Register (showing the results of regulatory decisions)		76	82	73
Clarity of the application guide (easy to understand) (TEQSA)		75	88	72
Facilitating the sector as a whole to protect students		74	85	68
Usefulness of feedback from TEQSA about your application (CRICOS)		72	79	68
Clarity of the assessment scope and evidence requirements (CRICOS)		72	67	74
Being encouraging without setting up unrealistic expectations		72	67	73
Helping the sector as a whole to deliver quality higher education		71	81	65
Using a variety of media and channels to communicate sector-wide updates		71	81	66
Usefulness of information about how to prepare an application (CRICOS)		71	56	78
Helpfulness of information on how to use the provider portal (for preparing and submitting applications online) (CRICOS)		70	75	66

Mid-tier performing aspects generally relate to consultation, engagement and case management



Performance (cont'd) (%) (Excellent + good)*		,	Total (excellent + good)*			
		Un	iversities	Higher education providers		
Helping the sector as a whole to manage risks		70	79	66		
Usefulness of the advice and support in relation to the reduction of administrative regulatory burden (including initiatives in response to the commencement of COVID-19 pandemic)		69	70	68		
Usefulness of information about how to prepare an application (TEQSA)		69	75	67		
Being fair and reasonable		67	70	64		
Usefulness of feedback from TEQSA about your application (TEQSA)		67	25	71		
Clarity of the assessment scope and evidence requirements (TEQSA)		67	71	66		
Usefulness of the annual health check phone call		66	62	66		
Implementation of the new Provider Category Standards		65	58	66		
Dealing with your organisation efficiently		64	54	68		
Listening to your organisation's views on better ways to protect student interests		63	63	61		
Providing your organisation with the opportunity to give feedback on application processes		61	50	63		
Being responsive to your organisation's needs		60	52	62		
Listening to your organisation's views on improving quality assurance (for example, feedback on guidance notes and other regulatory material / information)		60	57	61		
Usefulness of TEQSA-facilitated workshops and webinars to discuss regulatory requirements and quality issues		60	70	55		
Usefulness of the TEQSA 2021 Conference (which involves higher education providers and specialists and where issues of concern to the sector are discussed)		60	62	59		
Being consistent and clear about the goal posts for successful decision outcomes		60	72	54		
TEQSA's approach to case management		59	48	62		

Lowest rated measures continue to relate to timeliness

Total (excellent + good)*

Performance (cont'd) (%) (Excellent + good)*		rotar (oxoonont 1 good)			
		Universities	Higher education providers		
Having an accountable regulatory process where decisions are transparently justified	59	72	53		
Providing your organisation with the opportunity to give feedback on the annual risk assessment process	58	63	56		
Helping your organisation deliver quality higher education	58	48	62		
Giving timely feedback to save your organisation using its resources on applications that are unlikely to be successful	56	55	57		
Strengthening your organisation's capacity to manage risks	56	50	57		
Explaining clearly and constructively why decisions were made	55	44	58		
Demonstrating an understanding of your organisation's business or operating environment	55	50	56		
Timeliness of feedback from TEQSA about your application (CRICOS)	55	56	53		
Providing quality feedback on whether your organisation is meeting expected standards	54	57	53		
Strengthening your organisation's capacity to protect students	52	44	53		
Demonstrating an understanding of your organisation's specific needs	51	44	52		
Tailoring an application process to meet your needs	48	38	50		
Listening to your organisation's views on ways to reduce regulatory administrative burden	48	32	53		
Suggesting networks and resources that your organisation might use to improve performance	45	53	40		
Providing timely feedback on whether your organisation is meeting expected standards	41	39	41		
Minimising the time taken between submitting an application and first receiving a regulatory decision	40	47	38		
Timeliness of feedback from TEQSA about your application (TEQSA)	33	20	35		



Section highlights: Communication



All communication items are well-regarded

On all communication measures evaluated, at least six in ten of providers rate TEQSA's performance as either 'excellent' or 'good'. The proportion who rate TEQSA's performance on any communication item as 'poor' is negligible.

Good practice notes particularly valuable

A quarter of providers (27%) consider the usefulness of information contained in the good practice notes as 'excellent', moreso than any other communication items evaluated. Perceptions of good practice notes have improved over the past year.

TEQSA facilitated workshops, webinars and conference seen as less useful

Though a majority consider performance on both items as either 'excellent' or 'good' (60%), relative to other communication items, they are less well rated. In the case of TEQSA facilitated workshops and webinars to discuss regulatory requirements and quality issues, perceptions are trending downwards. A quarter (25%) were unable to evaluate TEQSA's 2021 conference, suggesting they may not have attended.

Total

Good practice and guidance notes are highly valued



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

Among those who provided a rating

					excellent + good*	Don't know	N/A
Usefulness of the information on the HES Framework (Threshold Standards) 2021 in the form of the guidance notes	22	67		10 11	88	1	3
Usefulness of the information contained within the good practice notes	27	60		12 1	87	0	2
Usefulness of information on TEQSA's regulatory policies and processes - provided through TEQSA's website and newsletters	20	59		19 11	79	0	1
Usefulness of information provided on the National Register (showing the results of regulatory decisions)	10	66		18 41	76	2	3
Using a variety of media and channels to communicate sector-wide updates	12	59		28 1	71	3	4
Usefulness of TEQSA-facilitated workshops and webinars to discuss regulatory requirements and quality issues	13	47	34	6	60	4	8
Usefulness of the TEQSA 2021 Conference (which involves higher education providers and specialists and where issues of concern to the sector are discussed)	12	48	32	5 3	60	5	20
	■Excellent	■Good ■Fair	■Poor	Very poor			

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

Base: All respondents (n=97).

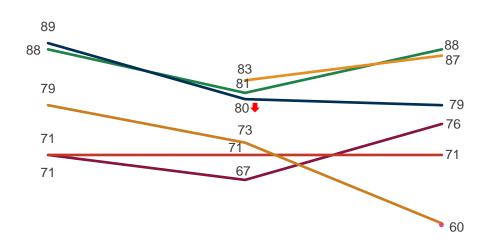
^{*} Don't know and not applicable responses have been excluded from the 'Total excellent + good' calculation.

Communication



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

Among those who provided a rating



- Usefulness of the information on the HES Framework (Threshold Standards) 2021 in the form of the guidance notes ~
- Usefulness of the information contained within the good practice notes
- Usefulness of information on TEQSA's regulatory policies and processes provided through TEQSA's website and newsletters
- Usefulness of information provided on the National Register (showing the results of regulatory decisions)
- Using a variety of media and channels to communicate sector-wide updates
- Usefulness of TEQSA-facilitated workshops and webinars to discuss regulatory requirements and quality issues
- Usefulness of the TEQSA 2021 Conference

2019 2021 2022

Q7. How would you rate TEQSA's performance over the last 12 months in terms of the following items? Base: 2022 respondents (n=73-96); 2021 respondents (n=115-126); 2019 respondents (n=125-140).

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

[~] Indicates the wording of this item has changed slightly since 2021.

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



Consultation

Section highlights: Consultation



TEQSA well
regarded on
implementation of
new Provider
Category Standards

TEQSA's highest rated consultation measure relates to the implementation of the new Provider Category Standards. Almost two thirds of providers rate TEQSA's performance on this measure as either 'excellent' or 'good'.

There are mixed opinions on feedback opportunities and processes

Views are more polarised when it comes to provision of opportunities for feedback and listening to organisational views provided. Despite a majority deeming TEQSA's performance as either 'excellent' or 'good' when it comes to listening to an organisation's views or providing them with feedback opportunities on nearly all matters, there are relatively high proportions of 'not applicable' or 'poor' ratings too.

Performance in reducing administrative burden continues to rate lower

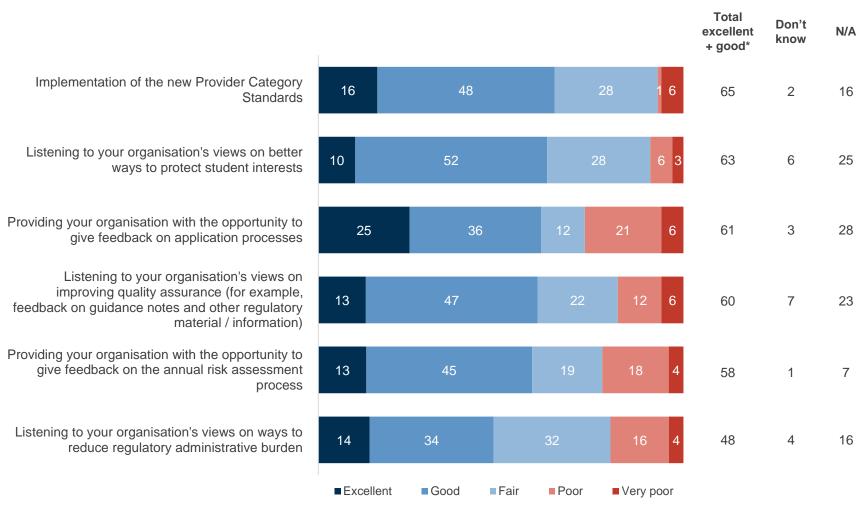
Again this year, the only consultation measure where less than half of providers (48%) rate TEQSA's performance as either 'excellent' or 'good' is the measure of 'listening to your organisation's views on ways to reduce regulatory administrative burden'. That said, perceptions of TEQSA's performance in this area has improved over the last 12 months. Providers recognise the need for information provision and reporting requirements but want to feel that all reports and requests are necessary.

Providers are most positive about TEQSA's performance in implementing the new Provider Category Standards



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

Among those who provided a rating



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

Base: All respondents (n=97).

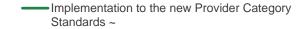
^{*} Don't know and not applicable responses have been excluded from the 'Total excellent + good' calculation.

Consultation

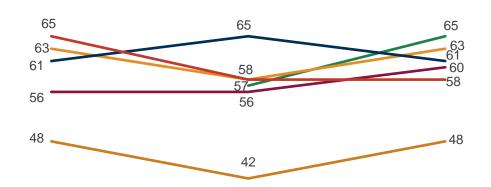


Performance of TEQSA's consultation (%) Total excellent + good*

Among those who provided a rating



- Listening to your organisation's views on better ways to protect student interests
- Providing your organisation with the opportunity to give feedback on application processes
- Listening to your organisation's views on improving quality assurance (for example, feedback on guidance notes and other regulatory material / information)
- Providing your organisation with the opportunity to give feedback on the annual risk assessment process
- Listening to your organisation's views on ways to reduce regulatory administrative burden



2019 2022 2021

~ Indicates the wording of this item has changed slightly since 2021.

Q8. How would you rate TEQSA's performance over the last 12 months in terms of? Base: 2022 respondents (n=67-89); 2021 respondents (n=95-118); 2019 respondents (n=92-126). * Don't know and not applicable responses have been excluded from the 'Total excellent + good' calculation.

Some providers state they have not been consulted with or offered the opportunity to provide feedback



While most providers rate TEQSA well on the opportunity to provide feedback on the application process (61% rate this as 'excellent' or 'good'), a relatively high proportion rate performance on this measure as 'poor' or 'very poor' (27%). Verbatim feedback from the open-response comments suggest that some providers either do not recall their feedback being sought on applications or want to see greater change occur as a result of this feedback.

On other consultation measures too, there are relatively high proportions of 'not applicable' responses, which may indicate that either providers have not had the opportunity to be consulted on those matters or they have not needed to.

There is a view that now, without COVID-19 lockdowns, TEQSA has an opportunity to host more in-person forums for engagement and consultation. More opportunities to have information sessions with question-and-answer time is also mentioned.

Some providers need to see more change as a result of feedback provided to feel confident the consultation is genuine. Among some who chose to provide comments on TEQSA's consultation performance, there appears to be some dissatisfaction with the outcomes of consultation when it occurs.

"Some of the questions asked during new course accreditation seem like questions for questions sake. If external reviewers are mostly happy, then TEQSA should try to avoid additional requirements."

"With the impact of the pandemic receding in terms of lockdowns, it would be greatly appreciated if TEQSA could once again begin holding fora and the like around issues of concern for the sector, for example academic integrity, alongside of relevant online webinars. A forum on implementation of the new research benchmarks would be helpful."

"Feedback on application process has never been requested or encouraged. Indeed, when offered, TEQSA staff seem to take the feedback as an affront and it affects working relationships with TEQSA staff, so we tend to keep our mouths shut."

"Whilst the provision of opportunity to provide feedback is present, it is questionable whether the feedback is actually incorporated which is disappointing. Risk assessments fail to take into account the nuances of each individual provider. TEQSA is too set in its ways that all providers are like universities and we are not. There are so many things that impact individual providers risk indicator assessments that do not impact universities yet these are not taken into account and ratings are determined by raw data alone."

"I can't remember TEQSA asking for input around the above matters from our organisation."

"Would like more opportunities to have virtual information sessions with the opportunity to interact and ask questions."

Providers question the necessity or usefulness of some information requests and reporting requirements



'Listening to your organisation's views on ways to reduce regulatory administrative burden' remains the only consultation measure where less than half of providers (48%) rate TEQSA's performance as either 'excellent' or 'good'. When given the opportunity to provide feedback on ways that 'TEQSA-specific reporting burden could be lifted without adversely affecting the performance of your organisation', nominated issues include:

- The Provider Information Requests (PIR).
- Material change requirements and notifications.
- Tertiary Collection of Student Information (TCSI).
- Some duplication of reporting requirements by other Federal Government agencies other than TEQSA.

While providers understand the importance of reporting requirements, they stress the need for requests to be genuinely necessary and not 'tick box' in nature. Some providers doubt much of the information provided is looked at in detail, yet it takes time for them to prepare.

There is a view that material change requirements should be based on risk the change presents.

Others would prefer self accreditation to be more achievable or based on historical performance, which would reduce the regulatory administrative burden.

"We find duplication of TEQSA's requirements with that of our professional accrediting organisation quite time consuming and onerous."

"As part of re-registration, TEQSA tends to ask for specific reports to be sent either once or each year. It seems this is TEQSA's way of assuring itself an organisation continues to meet the standards. While no one should object to useful reporting, it often feels like these reports are barely looked at and we receive no feedback. So, it seems like a tick box exercise in supplying the report as requested, but TEQSA isn't actually that concerned or interested. If they're not critical, maybe don't ask for them."

"The latest TCSI burden of having to report the age, gender, nationality, language spoken at home, seems unnecessary and intrusive and provides no additional data to anyone that can improve the quality or outcomes of delivery."

"I do not think this should be lifted but some more specific guidelines on when a material change notification would be useful. We submit a material change notification for all possible matters and sometimes feel that this is supplying detail that is reported elsewhere where the change is really just part of normal growth and development."

"Material changes – I would recommend that TEQSA review these based on repetitional risk to sector and reduce capture requirements for those that have a lower impact and test institutions management during reaccreditation."

"SAA should be easier to achieve which remove most of the issues we have with TEQSA."



Regulatory processes and activities

Section highlights: Regulatory processes and activities



TEQSA's polite and respectful conduct remains a strong point Almost all providers (89%) believe TEQSA's performance is either 'excellent' or 'good' in treating them with politeness and respect – including 45% who say it is 'excellent'. Ratings are often related to interactions with case managers. That said, not everyone reports positive experiences with their case manager.

TEQSA continues to be perceived to perform more strongly on a sector-wide basis When thinking about TEQSA's regulatory approach, providers are more complimentary of TEQSA's help and usefulness of advice and support to the sector as a whole, as opposed to strengthening an individual organisation's capacity. Some metrics specifically related to helping individual organisations' are trending downwards or have been unable to recover from declines in the past.

Time taken to make a regulatory decision still a sore point

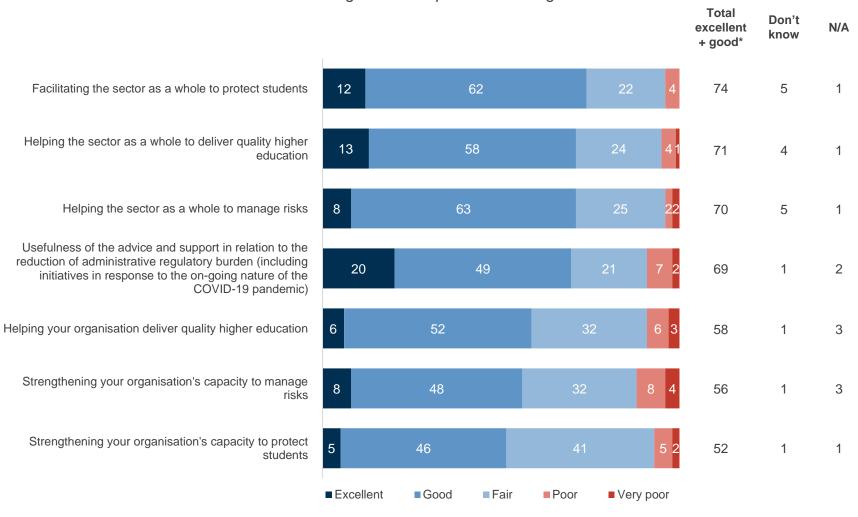
The only regulatory process or activities where a minority of providers rate TEQSA's performance as either 'excellent' or 'good' is in minimising the time taken between submitting an application and first receiving a regulatory decision. Almost a third consider performance here as either 'poor' or 'very poor'. Views on this metric have not improved over the past 12 months.

TEQSA is continues to be perceived to perform more strongly on a sector-wide basis



Rating of TEQSA's regulatory approach over the last 12 months (%)

Among those who provided a rating



Q9a. How would you rate TEQSA's regulatory approach over the last 12 months for each of the following items? Base: All respondents (n=97).

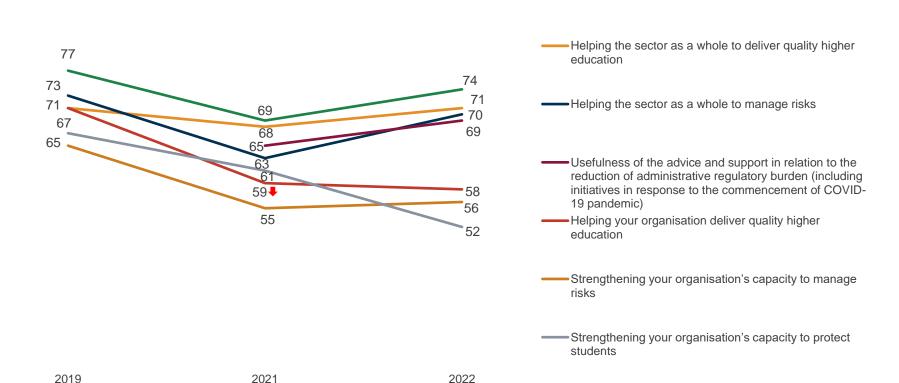
Facilitating the sector as a whole to protect students ~

Regulatory approach



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

Among those who provided a rating



Q9a. How would you rate TEQSA's regulatory approach over the last 12 months for each of the following items? Base: 2022 respondents (n=91-95); 2021 respondents (n=112-122); 2019 respondents (n=127-136).

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

[~] Indicates the wording of this item has changed slightly since 2021.

Significantly lower

♣ than the previous years result at the 95% confidence interval.

Total

TEQSA's politeness and respect is a strong point



Performance of TEQSA's regulatory activities over the past 12 months (%)

Among those who provided a rating

						excellent + good*	Don't know	N/A
Treating you with politeness and respect		45		44	5 2	4 89	0	1
Providing opportunities to address matters relevant to a regulatory decision, prior to a final decision being made ^	27		53		6 8 6	80	0	15
Being encouraging without setting up unrealistic expectations	13	59			17 6 5	72	6	5
Being fair and reasonable	17	49		22	8	67	3	1
Being consistent and clear about the goal posts for successful decision outcomes ^	10	49		24	10 6	60	5	5
Having an accountable regulatory process where decisions are transparently justified	10	49		22	14	5 59	4	10
Giving timely feedback to save your organisation using its resources on applications that are unlikely to be successful ^	12	44		21	15 8	56	5	31
Explaining clearly and constructively why decisions were made ^	18	37		25	13 6	55	1	9
Minimising the time taken between submitting an application and first receiving a regulatory decision ^	7	33	30		18 12	40	1	9
	■Excellent	■Good	■Fair	■Poor	■Very poo	r		

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: All respondents (n=75-97).

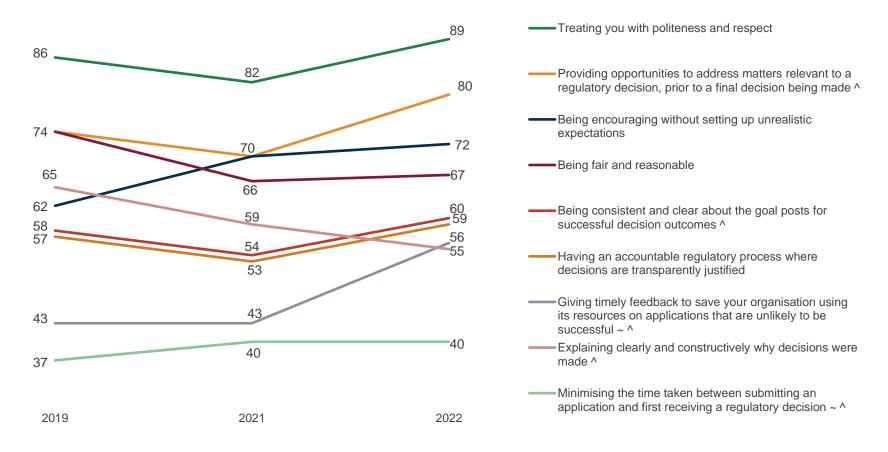
^{*} Don't know and not applicable responses have been excluded from the 'Total excellent + good' calculation. ^Those who made an application.

Regulatory activities



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

Among those who provided a rating



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: 2022 respondents (n=48-96); 2021 respondents (n=58-125); 2019 respondents (n=49-139).

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

[~] Indicates the item was reported as part of the 'Applications to TEQSA' section in 2019. ^ Indicates that the item was only asked of those who made an application.

TEQSA's treatment of providers is polite and respectful but proactive communication regarding timelines is sought



TEQSA remains more positively rated on sector-wide help and assistance as opposed to helping and strengthening individual organisations. TEQSA's Integrity Unit is noted as being a particularly positive addition for the sector.

That said, when it comes to treatment of organisations, almost all say that TEQSA is either 'excellent' or 'good' at treating them with politeness and respect. Verbatim feedback reinforces this sentiment.

On regulatory activities, time taken to receive a regulatory decision after submitting an application is the only metric where a minority rate TEQSA's performance positively (40%). TEQSA's rating on this measure remains unchanged from 2021. Providers would appreciate a proactive update on their application's progress.

Despite two thirds considering TEQSA's performance on being fair and reasonable as either 'excellent' or 'good' (67%), some providers argue the risk assessment process is not proportionate.

Consistency issues are also mentioned. There is a view among some providers that the views of experts and application of standards can vary based on interpretation. It is important that documentation and guidance notes provided is consistent.

"TEQSA has a history of moving the goal posts in many areas to the detriment of Providers. One example is in the area of guidance regarding scholarship. TEQSA has had three conflicting documents on scholarship over the past four years."

"I would like to thank the new staff at TEQSA (who we deal with) who have approached their roles with professionalism and respect."

"Establishment of the Higher Education Integrity Unit and provision of specific reports to individual institutions is a good initiative to improve academic integrity matters within universities."

"We submitted a response to TEQSA nearly 2 years ago and are still waiting on a decision."

"TEQSA's initiatives in academic integrity are a positive step for the sector in combating cheating activities."

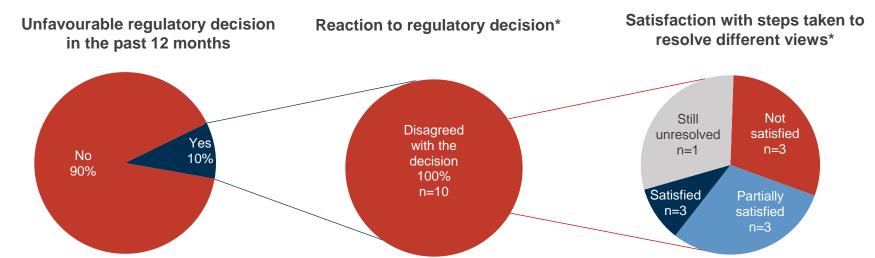
"We appreciate being able to respond to summary of concerns for new courses - it would just be helpful if all the TEQSA experts were consistent and all new the standards. We had feedback on a course referring to elements that are no longer in the National Code."

"Significant delay in receiving notification of the regulatory decision which has had an ongoing impact on operations. While it is understood that there is little that staff members can do to influence the timing of decision-making, updates have not been provided unless requested by the institution. A more transparent approach and proactive communication would be appreciated."

"Risk assessments are not fair nor reasonable. They fail to consider strategic changes in a provider that skew the data and use the raw data alone."

All organisations who had an unfavourable decision in the last 12 months did not agree with the decision





What steps were taken to resolve this matter?

Among those who disagreed with the decision

"Not worth the effort of objecting further." "Unresolved. We thought seriously about going to the AAT but cut our losses and offered the program elsewhere under a different regulatory authority. They accepted it automatically."

"Withdrawn application and will resubmit."

"TEQSA has failed to engage at all with our concerns. Its only response is to force us to go to the Administrative Appeals Tribunal at enormous cost for issues where TEQSA clearly made mistakes, including simple factual errors."

"Constructive engagement with TEQSA was not offered so had to go to the AAT."



Monitoring quality

Section highlights: Monitoring quality



Quality of feedback on standards adherence still well regarded Consistent with 2021, a majority of providers (54%) rate TEQSA's performance on providing *quality* feedback on whether their organisation is meeting expected standards as either 'excellent' or 'good'. That said, views have slightly declined each year in recent times.

The timeliness of TEQSA feedback remains poorly rated

In contrast to views on the quality of TEQSA's feedback, a minority of providers consider TEQSA's performance on providing timely feedback on whether an organisation is meeting expected standard as 'excellent' or 'good' (41%). This has been the case for several years.

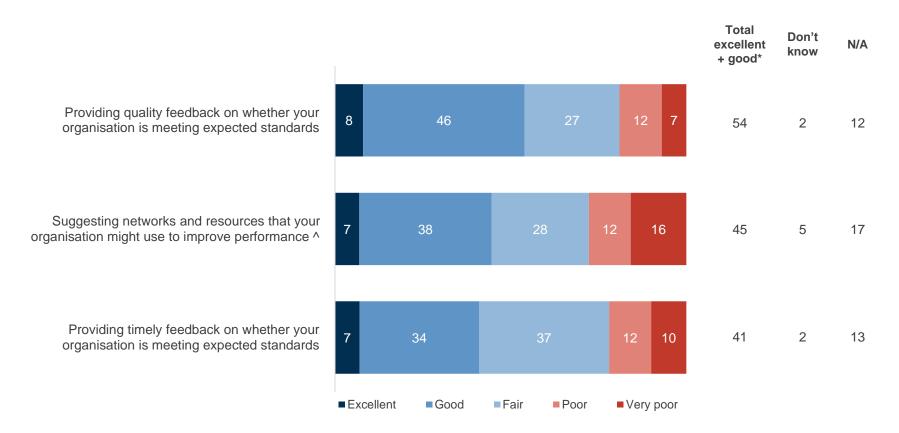
Potential lack of awareness and satisfaction with resources to improve Consistent with 2021, a relatively high number of providers can not rate TEQSA's performance on 'suggesting networks and resources that your organisation might use to improve performance' because it is 'not applicable' (17%). In 2022, over a quarter rate performance here as 'poor' or 'very poor'. This year, this measure was asked of those who submitted an application in the past 12 months.

There may be scope to improve awareness and perceptions of networks and resources for performance



Performance of TEQSA's monitoring quality over the last 12 months (%)

Among those who provided a rating

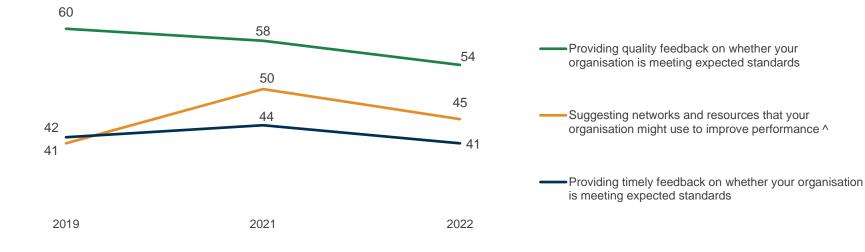


Monitoring quality



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

Among those who provided a rating





Applications

Section highlights: Applications



Clarity and usefulness of application information remains well-regarded

Again this year, with respect to both TEQSA and CRICOS applications, the clarity of the application guide, clarity of the assessment scope and evidence requirements and the usefulness of information about how to prepare an application are the top-rated elements of the process. That said, some providers would appreciate samples and templates to guide CRICOS applications.

Timeliness of TEQSA application feedback appears to be deteriorating

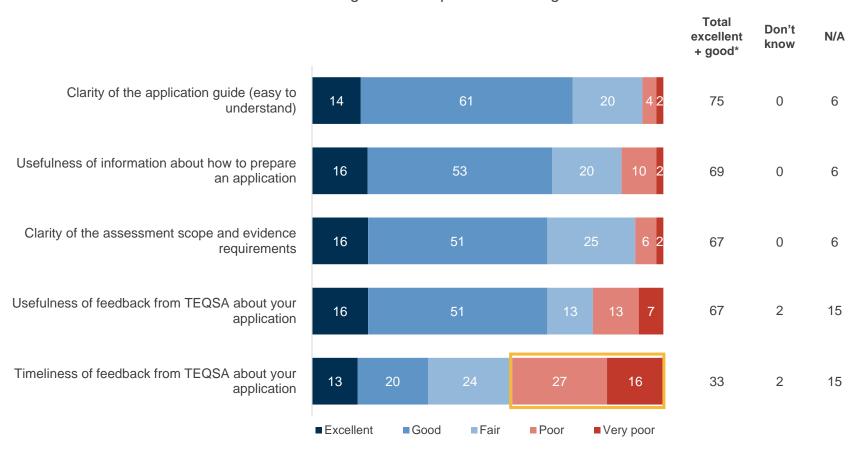
This year, the proportion of providers who rate performance in this area as 'poor' or 'very poor' (43%) outweighs those who consider it to be 'excellent' or 'good' (33%). Timeliness of TEQSA's feedback on CRICOS applications fares better – 55% say performance is 'excellent' or 'good' compared to 18% who say it is 'poor' or 'very poor'. Progress updates are suggested as a way to reduce some timeliness issues.

Providers are more likely to rate the timeliness of feedback as poor than either excellent or good



Performance of TEQSA's application process over the last 12 months (%)

Among those who provided a rating

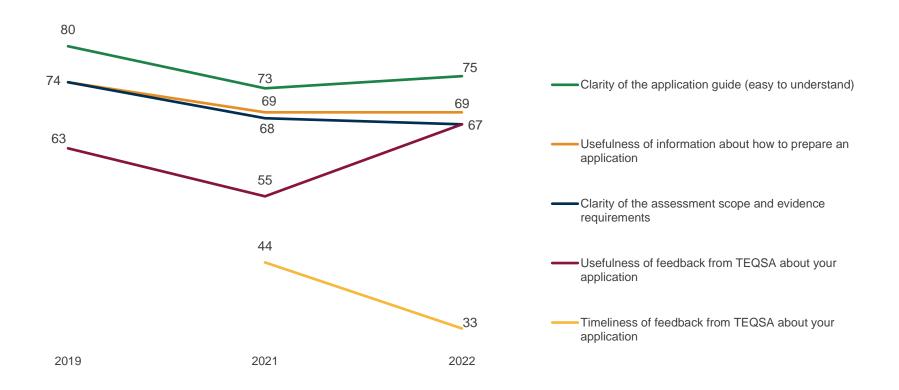


TEQSA application process



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

Among those who provided a rating



Q13a. How would you rate TEQSA's performance over the last 12 months on the following aspects of the application process?

Base: Respondents who indicated they applied for TEQSA registration, accreditation and / or self-accrediting authority: 2022 (n=45-51); 2021 (n=60-66);

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

Progress updates may help mitigate the impact of lengthy wait times



More providers rate TEQSA's performance on Timeliness of feedback as 'poor' or 'very poor' (43%) than they do 'excellent' or 'good' (33%). There are said to be commercial implications resulting from lengthy wait times.

Providers appear to wait long periods of time without any communication from TEQSA regarding their applications. Progress updates are suggested as a way to at least provide some indication of application status.

There is an assumption that TEQSA's timeliness issues are due to the organisation being under resourced.

"When you hear nothing for months after an application is submitted and have to escalate to the top of the tree then this is very poor."

"There is some caution on the part of TEQSA in providing requirements for re-registration and SAA. I think there were some changes to staffing and experience level may not always be there."

"Assessment of applications took considerable time even after we were told an outcome would occur much sooner."

"Timeliness still requires improvement - TEQSA only realised their own timeframes were reaching the legislative limit too late to ask for an extension so everything at the end of the process was very rushed."

"It would be helpful to have progress updates - especially since timeframes have a commercial impact."

"Long delays, some to do with COVID but others more systemic."

All aspects of the CRICOS application process are rated as excellent or good by a majority of providers



Performance of TEQSA following CRICOS application process over the last 12 months (%)

Among those who provided a rating Total Don't excellent N/A know + good* Clarity of the application guide (easy to 16 76 2 9 understand) Usefulness of feedback from TEQSA about your 21 72 2 20 application Clarity of the assessment scope and evidence 16 72 0 9 requirements Usefulness of information about how to prepare 12 71 0 7 an application Helpfulness of information on how to use the provider portal (for preparing and submitting 15 70 0 16 54 applications online) Timeliness of feedback from TEQSA about your 14 41 55 0 11 application ■ Excellent ■ Fair Poor Good ■ Very poor

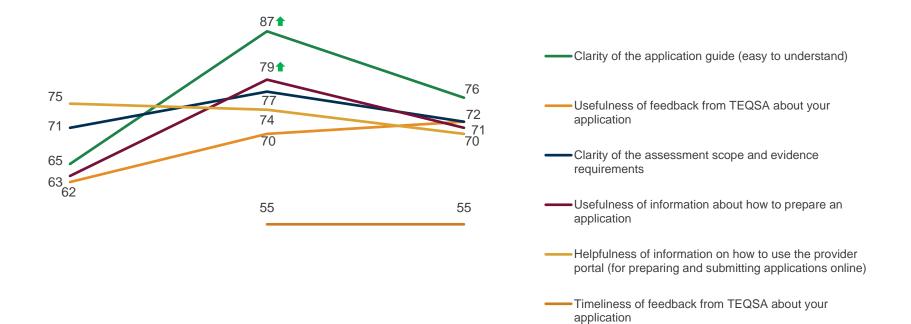
Q13b. How would you rate TEQSA's performance over the last 12 months on the following aspects of the CRICOS application process? Base: Those who indicated they applied for CRICOS or renewals (n=55).

CRICOS application process



Performance of TEQSA's CRICOS application process (%) Total excellent + good*

Among those who provided a rating



2019 2021 2022

Samples and templates are sought to assist in the application process



When asked to elaborate on why a provider rated TEQSA's performance as poor, the key theme again to emerge related to timeliness of feedback on applications. Despite this, timeliness of TEQSA's feedback relating to CRICOS application or renewals is more favorably viewed (55% provide a rating of 'excellent' or 'good' on this measure) compared to the timeless of feedback received when it comes to TEQSA registration or accreditation (33% provide a rating of 'excellent' or 'good').

Further, there appear to be a desire for samples or templates to be made available to assist in submitting applications. "Provide a sample (PDF version) of each CRICOS form to allow new users to understand the data, information, or evidence required. This would further allow for the information included in the form to be reviewed by more than one officer in the organisation before submission. Link the guidance notes / application guide to the type of form. Improve the information / quidance provided on evidence requirements."

"It would also be appreciated if TEQSA could make templates available for review. Some templates are only visible by commencing an application creating a ghost record that is hard to scrub from the system. A more transparent approach would allow for a more structured application process."

"The TEQSA portal was at times confusing when we attempted to remove previous versions of our submission, requiring assistance from our case manager to complete the process."

"Application samples are not as readily available as they used to be; the intersection between the ESOS audit process and the CRICOS registration process requires improvement - for example, once an audit is done and a response to recommendations is developed, is that the entire CRICOS reregistration process or is that just the start?"



TEQSA's case management

Section highlights: TEQSA's case management



Changes to case managers impact the approach's efficacy

Just under half (47%) have experienced changes to case managers over the past 12 months. When case managers change, there is a view that you lose the ability to develop constructive relationships and have to 'start from scratch' in imparting organisational knowledge. Understanding the organisation's business / operating environment and specific needs are lower-rated aspects of case management.

Phone calls and meetings remain the top rated aspect of TEQSA's case management

It is clear that providers value communication with their case managers. Usefulness of meetings and / or phone calls continue to be the top-rated aspects of case management. The annual health check is applauded in some anecdotal feedback. However, a relatively high proportion remain unable to rate the usefulness of this phone call or say it is 'not applicable' to them, suggesting not all are receiving them.

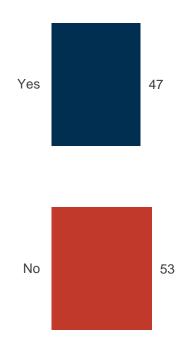
There is a desire for case managers to be able to answer more queries

Providers can be somewhat frustrated when they are directed to other TEQSA teams for answers to queries, rather than having their case manager answer the question. There is a view that sometimes this can be the result of a case manager's lack of confidence or a lack of understanding of the duties of each section within TEQSA. The greatest change this year relating to case management performance was a 9% decline in 'being responsive to your organisation's needs'.

Just under half of providers have experienced a change to their case manager contact in the last 12 months



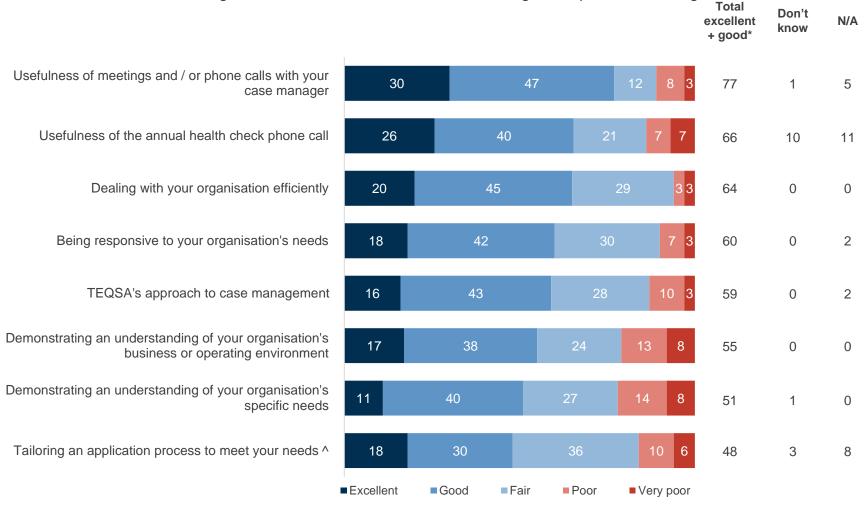
Changes to case manager contact over the past 12 months (%)



Phone calls and meetings remain top rated aspects of case \ management but their occurrence may not be universal



Among those who interacted with their case manger and provided a rating



Q14c. How would you rate TEQSA's performance over the last 12 months on the following aspects of its case management approach? If you have experienced considerably different or varied case management in this period, please focus on the **current** situation.

Base: Those who have interacted with a TEQSA case manager (n=75-92).

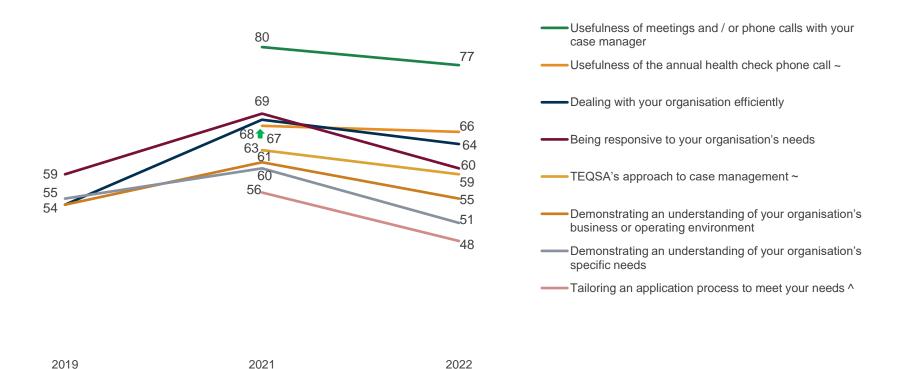
^{*} Don't know and not applicable responses have been excluded from the 'Total excellent + good' calculation. A Those who made an application.

Case management



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

Among those who provided a rating



Q14c. How would you rate TEQSA's performance over the last 12 months on the following aspects of its case management approach? If you have experienced considerably different or varied case management in this period, please focus on the **current** situation.

Base: 2022 respondents (n=67-92); 2021 respondents (n=66-112); 2019 respondents (n=125-126).

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

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

[~] Indicates the wording of this item has changed slightly since 2021.

Providers have mixed experiences with case managers



The introduction of the annual health check is phone call is applauded (66% rate TEQSA's performance on this item as either 'excellent' or 'good'). Some providers would like to see the health check phone calls occur more frequently. There are anecdotal statements of praise for some case managers.

Limited interactions between case managers and providers can result in organisations feeling that their case managers fail to understand their business needs.

Poor case management ratings are often linked to:

- A lack of or declining level of contact with case managers – some appear to be unaware of health check phone calls (10% say they don't know how to rate these and a further 11% say it is not applicable)
- Frequent changes to case managers (47% have had changes to case manager contact over the past 12 months)
- A feeling that case managers do not understand institutions or the higher education landscape
- A perceived disconnect between case managers and higher-level management of TEQSA
- Frustration with being referred elsewhere when providers ask a question of their case manager
- A feeling that case managers are reluctant to build relationships with providers.

"The newly introduced annual health check was great - we would like to suggest these are scheduled twice a year. Great initiative!"

"We have not had an annual health check phone call that I can recall in 10 years. Our current case manager is relatively new to case management and does not seem to understand our business needs at all."

"We have had very little contact with our case manager in the past 12 months and are not convinced that they have a clear understanding of the organisation's operations."

"The changes in the distribution of the duties of each section within TEQSA has never been made clear. E.g. you no longer discuss or provide all information to the same person, you have different people for different elements, and this has never been communicated. My case manager never feels confident to give a response when asked a question but always refers up, which is fine, but why have a case manager then? Also, my large organisation has not yet had a health check, what are these?"

"Generally, our interactions with TEQSA are excellent and the advice we receive is always helpful and responsive. However, our case manager doesn't seem to understand our operational context and is more of a shepherd in directing us to the relevant team within TEQSA rather than being able to assist with queries."

"The case management system is appreciated and generally works well however high turnover continues to be an issue. The importance of a case manager who is familiar with the provider's history, operating environment and needs cannot be overstated. A more proactive approach to following up on outstanding regulatory decisions would be appreciated."



Changes in the last 12 months

Section highlights: Changes in the last 12 months



Continued lack of awareness about how TEQSA re-uses material

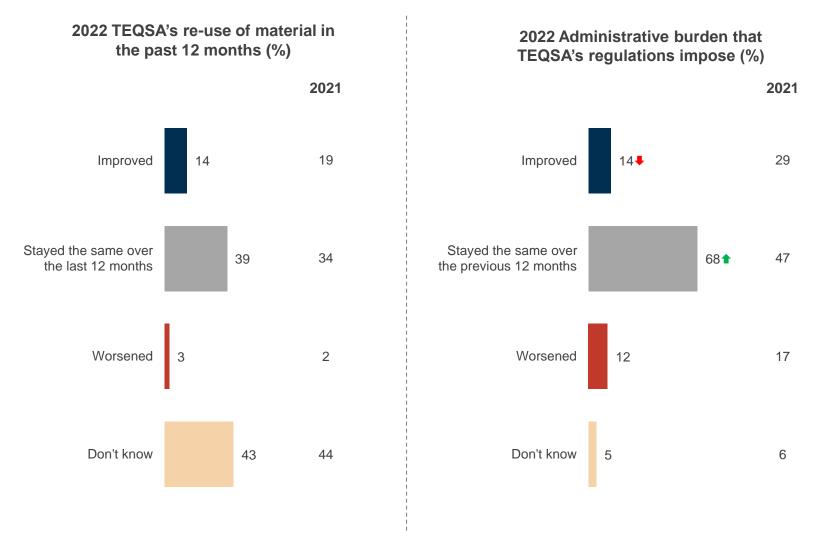
Consistent with 2021, more than two in five providers 'don't know' what they have noticed about TEQSA's re-use of material that their organisation has provided in the last 12 months. This continued high proportion of don't know responses suggests that many providers remain unaware of when TEQSA re-uses material they have provided.

Fewer changes to material re-use and administrative burden apparent this year

The proportion of providers who say things have stayed the same over the past 12 months has increased both with respect to re-use of material and the administrative burden that TEQSA's regulations imposes. In the case of the administrative burden imposed, the increase has been statistically significantly.

The administrative burden on providers has neither improved nor worsened in the last 12 months





Q15a. 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. / Q15b. In the last 12 months, what have you noticed about the administrative burden that TEQSA's regulations impose on your organisation?

Base: All respondents 2022 (n=97); 2021 (n=126).



Sector risks

Section highlights: Sector risks



Threat posed by international border closures has halved

In 2022, just under four in ten providers (39%) consider international border closures to be a 'high threat'. This compares to over eight in ten (85%) who considered international border closures to be a high threat last year. Other international issues have however emerged as potential threats to the sector, including geopolitical difficulties in re-establishing international partnerships.

Perceived threat of regulation impeding innovation increasing

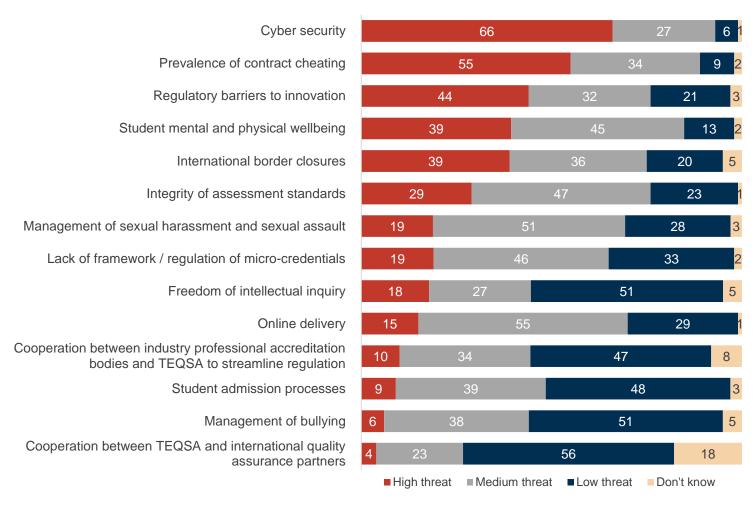
Just over four in ten providers (44%) rate regulatory barriers to innovation as a high threat to the sector. In 2019, 33% said the same and in 2021, this increased to 40%. While the year on year increases are not statistically significant, the threat of regulation impeding innovation is trending upwards.

Contract cheating a prevalent threat but TEQSA's work here acknowledged Like regulatory barriers to innovation, the perceived threat of the prevalence of contract cheating is also trending upward overtime. This year, over half of providers (55%) consider this issue a high threat. That said, providers appreciate the establishment of the Integrity Unit and TEQSA's work in combating contract cheating. They hope this work will continue.

Two thirds of providers consider cyber security a high threat to the sector



Sector risk threat levels (%)



Q16. TEQSA has a responsibility for environmental scanning to identify emerging risks to the quality and reputation of the sector. These risks need to be developed in partnership with all higher education providers. From the list of future risks that were reported in the 2021 survey, in addition to those we are currently aware of, we have selected the following for your comment. What level of threat do you think the following factors pose to the quality of the sector in coming years?

Base: All respondents (n=97).

Concerns and threats to the sector extend beyond those quantitatively evaluated



Many comments are provided in relation to the importance of addressing contract cheating and academic integrity. The work of the Integrity Unit in doing so is applauded.

Regulation impeding innovation is also frequently mentioned in verbatim responses. The perceived threat level of regulation impeding innovation has been increasing year on year.

Frequently mentioned immediate or future threats, *beyond* those evaluated quantitatively include:

- Students changing courses despite visa limitations
- The Federal Government offering international students unlimited work rights during study and the impact this is having on attrition and progression
- Introduction of various Government levies
- Geopolitics affecting international partnerships
- Lack of resources within institutions for quality assurance
- Cost recovery, including the impact on viability of some providers and the delays in fee determinations schedules for cost recovery
- · Lack of timeliness impacting ability to innovate
- Changing government policy after the election and lack of clarity regarding what will change.

"TEQSA needs to investigate why international students are allowed to continuously drop out of higher education down to a vocational education course (lower AQF level) even though the conditions on their study visa prohibits this."

"Increase and / or introduction of levies. Tuition Protection Service (TPS) Domestic Levy, TEQSA cost recovery all impact on the ability to invest in quality education, where dual providers, also impacted by similar ASQA levies. Appreciate that these are a price to play, however, differential treatment such as 25% FEE-help loading for undergraduate programs does not allow for an even playing field."

"There is significant diminution in the resourcing for quality assurance at some institutions through the pandemic that may impede quality assurance into the future."

"Ongoing SASH; ongoing impact to the sector on full cost recovery proposals and delays of the fee determination schedules."

"Geopolitical and regulatory difficulties re-establishing international partnerships post-pandemic. Regulatory brakes on innovation in course offerings."

"Adaptability to meet an uncertain global environment. Encouragement of flexible delivery and assessment to meet disruptive events such as pandemics."

"Innovation should be encouraged and fostered by TEQSA. There is a risk to innovative practice if regulatory burden is too high."

Sector risks



Sector risk threat levels (%)

	High threat (%)		
	2019	2021	2022
Cyber security	43	76 ↑	66
Prevalence of contract cheating	48	52	55
Regulatory barriers to innovation	33	40	44
Student mental and physical wellbeing	27	43 ↑	39
International border closures	N/A	85	39₹
Integrity of assessment standards	N/A	26	29
Management of sexual harassment and sexual assault	22	17	19
Lack of framework / regulation of micro-credentials	5	231	19
Freedom of intellectual inquiry	15	14	18
Online delivery	N/A	28	15₹
Cooperation between industry professional accreditation bodies and TEQSA to streamline regulation	17	10	10
Student admission processes	N/A	11	9
Management of bullying	17	13	6
Cooperation between TEQSA and international quality assurance partners	N/A	3	4
Impact of the new provider category standards	N/A	10	N/A



Perceived strengths and weaknesses

Section highlights: Perceived strengths and weaknesses



TEQSA's work on academic integrity and contract cheating is praised

Common themes emerging from responses to what TEQSA does well is the work it has done on upholding academic integrity in general, contract cheating and the establishment of the Integrity Unit. Moreover, the introduction of annual check ins between case managers and providers is considered a positive addition this year.

There is an opportunity to engage more with providers in person

Timeliness in responses to providers and feedback on applications remain a key area for improvement. Aside from timeliness, providers express their desire for more in-person engagement with TEQSA. They would like to see TEQSA representatives visit their institutions in person, provider more on-the-ground training, and encourage more relationship building with case managers.

There is little that TEQSA should stop doing entirely When asked what TEQSA should stop doing, some commentary is provided regarding PIR staff data reporting, which is linked to broader frustrations around duplication of reporting requirements. Others appear frustrated at case manager interactions or perceived unfair treatment of different provider categories.

Perceived strengths and weaknesses of TEQSA



Strengths - what TEQSA does well

- · Introduction of annual check ins with case manager.
- · Establishment of the Integrity Unit.
- Information provision guidance notes continue to be greatly appreciated.
- Risk based approach to regulation / risk management focus.
- Communicating sector risks and challenges.
- Flexibility when needed.
- Ensuring academic integrity and the quality of the higher education sector in general.

Weaknesses – where TEQSA could improve

- Encourage case managers to build more personal relationships with providers. Phone calls and face to face meetings are suggested, as opposed to emails.
- Increasing the frequency of interactions with case managers.
- Inform providers how TEQSA uses some of the information providers must supply, such as material change notifications. Providers suggest being more critical of the need to ask for information.
- Work with smaller institutions to help them better be able to meet standards.
- Timeliness of response to providers.
- Retention of staff within TEQSA and employing people with sector knowledge.
- More clarity around / change approach to risk judgments.

Opportunities – what TEQSA should do more

- Send TEQSA representatives in person to institutions, to better understand what they do.
- Provide on the ground training or support in implementing the Higher Education Standards Framework.
- Running workshops or information sessions on standards and application preparation.
- Engage with providers on a more strategic basis help providers better understand TEQSA's key concerns, strategic direction and expectations.
- Consider how regulation may need to adapt to innovations in course and program delivery.

Threats - what should TEQSA stop doing

- Perceived unfair treatment of private providers compared to universities.
- Duplication with other professional bodies and regulators namely, PIR staff data reporting.
- Some grievances with risk assessment approach.
- Referring to website material in place of a meeting between a provider and TEQSA.
- Having different case managers for different matters.
- · Relying on media reporting for issues monitoring.

Select verbatim responses: Strengths and opportunities



What TEQSA does well?

"Adjusting regulatory requirements in response to the difficulties of COVID-19."

"Using case managers to reach out to providers."

"Flexibility during times of crisis."

"Introduction of annual check-in with case manager."

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

"Guidance notes, establishment of Higher Education Integrity Unit, and academic integrity resources."

"Contact cheating intelligence sharing, light touch engagement with low risk providers."

"TEQSA has done well in supporting institutions with tools and advice throughout the recent changes to program delivery in the sector, and to assist with academic integrity matters."

"Annual informal TEQSA case manager and provider catch-ups, continued provision of relevant and helpful guidance information and resources on its website to support providers and the sector."

"Providing leadership on sector-wide emerging risks, such as academic integrity and cyber-security."

What should TEQSA be more involved in?

"Reach out to providers more often and occasionally send reps to orientations days to see what institutions in fact do."

"More involvement in the discussion around risk rating outcomes, more individual / bespoke responses to college replies and move away from one size fits all approach."

"Coal face engagement with providers. Come visit, we would love you to see us and our wonderful students."

"Get a good grip on the institutions it is managing by physically visiting and investigating what a college is actually doing – get a hands-on feel for the institution, the students and its staff."

"Defining best practice in online assessment."

"TEQSA should publish best practice examples for universities and for smaller private providers to assist in the implementation of the HESF on the ground. We don't need any more high level academic publications telling us what good practice should look like – we need real, on the ground, examples."

"Working with and supporting providers in better understanding and implementing key aspects of the HESF. In other words, less regulation and more cooperation to create a genuinely collaborative partnership to enhance quality and compliance."

"Visiting colleges to offer professional development."

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



Where could TEQSA improve?

"They should encourage case managers to reach out by telephone to add a personal touch to their approach. The Agency currently appears too rigid. Waiting for emails over simple issues that could be resolved by phone calls is simply not good enough."

"Continue to build personal relationships with providers so that they feel TEQSA is there to support rather than punish them."

"It would be useful for institutions to know what does TEQSA does with the material change notifications. Some seem unnecessary."

"Talk more to providers on a personal level. Use the telephone to confirm circumstances before firing off emails."

"Employment of staff with a background in the sector would make the work of TEQSA more effective, as staff would have a better understanding of the questions and issues raised by institutions."

"Fix internal culture so that staff with sector knowledge are retained; commit to engaging constructively with providers over adverse decisions."

"The recruitment of case managers really needs to be more targeted to the private sector – given private institutions make up the vast majority of TEQSA's customers (not size-wise, but numbers-wise), to have case managers who really understand the needs of the private institutions in the HE space would help immensely."

"Risk assessment calculation and response."

What should TEQSA stop doing?

"Asking for information but not providing feedback to the client on the outcomes or what it has been used for."

"Using the media as a tool for industry regulation is unreliable and subjective."

"Putting small providers in the same category as large universities.

We have three staff to do the work of a whole department."

"TEQSA should stop taking the responses from their experts as being gospel. Every expert has a different view, and probably a different view each time you ask them! The concept of TEQSA slowing down course application processes (for example) to seek their own experts input (with no provider context), undermines the input of experts put forward by providers. If providers don't submit expert reports or lack evidence of such, then it makes sense for TEQSA to seek external advice. It doesn't make sense for TEQSA to seek advice in addition to external expert reporting provided."

"Having different case managers for different matters. The institutional case manager has to be kept in the loop of all the different discussions – which can be with two or three other case managers. Just one case manager per institution would be easier and would allow that person to have a fuller knowledge of the institutions they had responsibility for."

"Risk assessments. They are completely meaningless with respect to our organisation as they are based on raw data with no consideration of anything else."

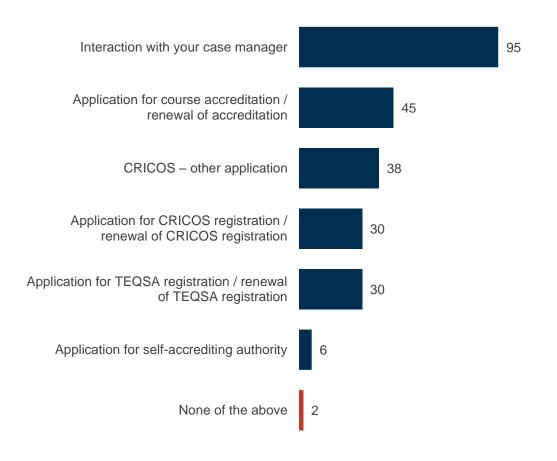


Interactions with case managers remains the most common form of engagement with TEQSA



Interactions with TEQSA in the last 12 months (%)

Multiple response allowed



THERE ARE
190 TEQSA
REGULATED
PROVIDERS
IN AUSTRALIA...

FIND OUT WHAT THEY'RE THINKING.



Contact us 03 8685 8555



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