



Australian Government

Tertiary Education Quality and Standards Agency



# TEQSA's External Reporting Program

## Consultation Paper

July 2016

### Responding to this paper

Responses to the consultation questions posed on **pages 3 and 5** of this paper, and other relevant feedback, are requested via email to [consultation@teqsa.gov.au](mailto:consultation@teqsa.gov.au).

Submissions close at **5.00pm on Wednesday 31 August 2016**.

Interested parties can also email [consultation@teqsa.gov.au](mailto:consultation@teqsa.gov.au) with queries about this paper, or to seek clarification of the consultation questions.

Please note that TEQSA intends to publish a summary report of submissions received. If you do not wish your submission to be published in full or in part, please indicate this in your response. TEQSA may alter the format or content of submissions before they are published, or decline to publish particular submissions, having regard to the requirements for Australian Government websites.

## Background and Purpose

As the national quality assurance agency of Australia's higher education sector, TEQSA is in the unique position of being able to bring together multiple sources of information and data to provide insights and advice on key themes important to the sector and to wider stakeholders.

In its recent engagement with the sector, TEQSA has discussed the publication of material it gathers and analyses as part of its regulatory activities, such as assessment outcomes and compliance with the Higher Education Standards Framework (the Standards). Feedback from the sector at provider round-table events in late 2015 supported the publication of further information, noting the potential sensitivities and the need for careful presentation of the information that TEQSA holds. In recognition of this, TEQSA undertook to consult the sector on the form and content of this reporting.

Reporting on regulatory activities and issues affecting the sector is grounded in the objects of the *Tertiary Education Quality and Standards Agency Act 2011* (TEQSA Act), in particular “to ensure that students have access to information relating to higher education in Australia”. Further, Section 134 (1)(e) of the TEQSA Act states that one of TEQSA's functions is “to collect, analyse, interpret and disseminate information” relating to higher education providers, regulated higher education awards, quality assurance practice and quality improvement.

TEQSA [publishes](#) a range of guidance material on its regulatory functions and sector data such as the *Statistics Report on TEQSA Registered Higher Education Providers* and *Key Financial Metrics on Australia's higher education sector*. In continuing to enhance the provision of information on Australia's higher education sector, TEQSA is guided by the following principles:

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

To inform the public release of information currently held by TEQSA, comments from stakeholders are invited on the proposals outlined in this paper. TEQSA is interested in hearing from you on these proposals, and feedback and suggestions you may have more generally about TEQSA's external reporting program.

## Proposed Reporting Areas for Consultation

As part of its external reporting program, TEQSA intends to publish analyses relating to the outcomes of assessment processes over the last four years. Feedback on the form and content of how this material is presented is sought.

Further to this, TEQSA holds a range of information from its data collection, risk analysis and assessment functions which may inform the public about the operations of the higher education sector. TEQSA is seeking feedback on the suitability of a range of areas of information that would be of greatest value to students, providers and the general public. Proposals for other areas where stakeholders would like to see TEQSA provide further information are also sought.

The outcomes of this consultation will also inform TEQSA's future external reporting program.

### 1. Reporting and publishing data and analysis on assessment outcomes

TEQSA sees consolidated reporting on the outcomes of its assessment processes as a core component of its external reporting program. TEQSA currently maintains the National Register of Higher Education Providers, where the outcomes of individual processes are reported. TEQSA now holds significant information on the sector's compliance with the Standards, and will report this information to provide a view of the sector's compliance with the Standards and any trends in compliance over the last four years.

The purpose of this type of reporting is to improve information to stakeholders on compliance with the Standards, including identifying the Standards that have been most commonly subject to risks of non-compliance. This analysis would detail the outcomes of TEQSA's core assessment processes completed under the TEQSA Act, namely:

▶ Initial Provider Registration	▶ Renewal of Registration
▶ Course Accreditation	▶ Renewal of Course Accreditation

TEQSA intends to report analysis on assessment outcomes at a sector level. The compliance record and status of individual registered higher education providers is currently published on the TEQSA National Register. TEQSA's intention is to publish information by groupings of providers as TEQSA believes that this differentiation will allow themes to be readily viewed. The proposed groupings for this analysis are:

- ▶ Universities;
- ▶ Non-University Higher Education Providers - For-Profit; and
- ▶ Non-University Higher Education Providers - Not-For-Profit (divided by TAFE, Faith-based and 'Other' providers).

The analysis of outcomes will identify where applications have been one or more of the following:

- ▶ Rejected;
- ▶ Approved for a period less than the maximum seven years;
- ▶ Approved with conditions;
- ▶ Approved with request(s) for information (under section 28 of the TEQSA Act); or
- ▶ Approved for the maximum seven years.

The benefits of publishing this material for stakeholders include:

- ▶ Promoting the Standards, and an understanding of what a quality higher education experience can be for students;
- ▶ Promoting the National Register as a source of information on the quality of providers in supporting student choice;
- ▶ Making apparent how TEQSA is supporting a quality student experience;
- ▶ Directing providers to TEQSA guidance material relevant to the Standards;
- ▶ Assisting in directing providers' internal quality assurance activities towards areas of identified compliance risk; and
- ▶ Focusing evidence and strengthening documentation submitted by providers during their own assessment processes.

### ***Reporting of assessment outcomes and insights***

TEQSA has undertaken to publish further analyses on the outcomes of its assessment processes. Analysis of this information will cover compliance themes (areas of the Standards which are commonly not being met), underlying causes of non-compliance, and insights about how providers have demonstrated compliance. Further, TEQSA may provide examples of good practice in areas under the Standards. TEQSA may include in the above analysis case studies and links to broader TEQSA guidance material, and information on how TEQSA views and interprets the Standards. TEQSA may provide this information in the form of a data report, or analytical insights based on key data findings.

It is planned that TEQSA will provide updates on this material when there is a sufficient volume of assessment outcome decisions to inform meaningful insights.

In responding to the following questions, considerations may include: the appropriateness of the proposed provider groupings or data segmentation; coverage of TEQSA processes; relevant support material; the usefulness of case studies; and/or how best to represent examples of good practice to support process improvement.

### **Consultation questions**

- ▶ **Question One:** Do you support the proposed areas of coverage for the reporting of analysis and insights from TEQSA assessment outcomes? If not, why, and what changes would you propose?
- ▶ **Question Two:** What supporting material could TEQSA provide to assist an understanding of compliance from these assessment processes?

## 2. Potential future areas for TEQSA's reporting program

Further to reporting on assessment insights as outlined above, there is a range of information held by TEQSA that may contribute to an improved understanding of Australia's higher education operations, as viewed under the TEQSA Act.

Some examples include risk analysis and decision making, compliance information, or issue-specific reporting and research. These areas are discussed below.

In publishing information in these areas, TEQSA is cognisant of the potential risks including reputational risks, from misinterpretation of such information. As such, TEQSA will seek to achieve an appropriate balance between these risks and the need to support and inform the public. In this regard, it should be noted that reporting on these areas may be at the individual provider level.

### ***Risk analysis and decision making***

TEQSA's *Risk Assessment Framework* enables a consistent, structured and systematic approach to assessing regulatory risk across all TEQSA-registered higher education providers.

To date, no information on the outcomes of TEQSA risk assessments have been publicly released. Rather, TEQSA considers that an accurate view of provider compliance with the Standards follows an assessment which is reported publicly on the National Register, with the annual risk assessment process helping to prioritise TEQSA's regulatory process.

Of consideration here is the nature of regulatory risk, where the appetite for TEQSA to identify issues is necessarily greater than the actual level of risk. This ensures risks are sufficiently captured to ensure they can be comprehensively reviewed at the point of an assessment under TEQSA's 'Core+' evidence requirements. To this end, releasing information on risk assessments may over-represent risk in the sector, potentially impacting on the reputation of the sector.

This type of reporting could involve an analysis of data/information presented in the risk assessments, and the relationship between risk assessments and the outcomes of assessment processes. This may include the proportion of flagged risks against each risk indicator and overall evaluation area, an analysis of the characteristics of 'Low', 'Moderate' or 'High' risk providers, or a comparison of a provider's risk assessment and eventual assessment outcome.

The benefits of this type of reporting goes to how providers may view their own risk assessment in the context of the sector, could highlight areas of risk where providers can focus their own quality assurance activities, and may provide the public with confidence in the quality of the higher education sector and its regulation.

### ***Reporting on TEQSA's compliance activities***

Further to information included as part of the assessment insights reports mentioned earlier and information included in the Statistics Report, reporting on this area would provide an all-encompassing view of TEQSA's operations by publishing information held relevant to compliance with the TEQSA Act, and in building a complete view of compliance of the sector.

Providing a comprehensive view of compliance beyond scheduled review processes, this reporting could be used by TEQSA as a way of communicating common issues to providers in a consistent manner. It could also further develop an understanding of provider responsibilities under the TEQSA Act, as opposed to the Standards. Information here may include provider compliance with information provision requirements, the quality or timeliness of applications and reporting on actions arising from assessment outcomes.

### ***Issue-specific reporting and research***

A key priority identified in TEQSA's *2015-2019 Corporate Plan* is to "identify, monitor and respond to significant trends, incidents and risks to higher education that is delivered in or from Australia", with TEQSA in the unique position of being able to give a complete view of the sector, utilising both quantitative and qualitative data collected from a number of sources.

Issue-specific reports or research papers have the potential to provide broader knowledge to the sector, thinking beyond compliance with the Standards and other legislative obligations, and encourage good practice in the sector.

It is expected that the frequency of this type of reporting will be occasional, as issues or areas of interest arise. Examples of this type of information could include the international activities of Australian higher education providers, or research into the causes and characteristics of attrition in the sector.

### **Consultation questions**

- ▶ **Question Three:** Of the potential reporting areas presented above, which information do you support being published by TEQSA?
- ▶ **Question Four:** In publishing information on these areas, what risks/considerations should TEQSA take into account?
- ▶ **Question Five:** Is there any other information held by TEQSA that you would find of value to inform the sector and general public's understanding of TEQSA and/or higher education providers?

## Consultation process

We understand that higher education providers have recently had significant engagement with TEQSA, most notably in regard to the *Key Financial Metrics of TEQSA Registered Higher Education Providers* consultation, and in discussions around the transition to the new *Higher Education Standards*. TEQSA appreciates your participation, and we recognise that this is a voluntary contribution of your time. Equally, we are committed to ensuring that the sector is consulted on significant developments such as this proposed publication program.

Public consultation will occur for six weeks in July and August. Targeted discussion with key stakeholders and peak sector bodies will also occur at this time.

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