

TEQSA Provider Survey 2023 Research report

Prepared for the Tertiary Education Quality Standards Agency (TEQSA)

September 2023

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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. Through this mechanism, TEQSA seeks to gain insights into provider 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 2023 annual report.

Research methodology





Unique contact details for n=197 primary contacts of TEQSA-regulated providers were provided by TEQSA.

JWS Research emailed a link to the survey to the n=197 stakeholders for whom an email address was supplied, providing for an attempted census.

n=95 primary contacts each from different organisations including universities and institutes of higher education completed the survey, providing a response rate of 48%, meaning the survey captured the views of 48% of TEQSA regulated providers.

- Four reminder emails were sent to maximise participation in the survey.
- The maximum margin of error on the total sample of n=95 is +/-7.2% 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.
- In 2023, analysis by provider category is based on the new provider categories introduced on July 1, 2021, and comprised n=29 universities and n=66 institutes of higher education.

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

Conducted 26th June to 21st July, 2023.

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



Executive summary

Executive summary

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TEQSA's overall performance rating has declined



Two thirds of providers (66%) rate TEQSA's overall performance as either 'excellent' or 'good' – a 10-percentage point decline from 2022.

While TEQSA's overall performance remains generally well regarded, the result this year represents an end to a multi-year period of consistency in overall performance ratings. While the decline is not statistically significant (at the 95% confidence interval), the 10-percentage point drop nevertheless means that TEQSA's overall performance rating is at a low point.

Perceptions of TEQSA's performance is often linked to experiences with case managers.

Performance on most individual KPIs are either stable or have declined

Perceptions on most individual KPIs have either stabilised or declined following upticks in 2022. It is important to note however that no KPI declines are statistically significant.

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



'Regulatory actions undertaken by TEQSA are proportionate to the risks being managed' – 52% rate TEQSA performance on this metric as either 'excellent' or 'good' – down from a series high of 64% in 2022.



'TEQSA is open, transparent and consistent in its dealings with your organisation' – 57% rate TEQSA performance on this metric as either 'excellent' or 'good' – down from 65% in 2022.



'Upholding quality standards with a proportionate approach to managing risks and supporting the sector to comply and improve' (Impact A) – 61% down from 70% in 2022.

Continuous improvement is the exception this year



In contrast, one KPI has improved – halting any further deterioration after a significant decline in 2022:

'Continued improvement in regulatory framework in consultation with your organisation' – 51%, up from 46% in 2022.



Communication and information provision remain the areas where TEQSA performs best



On all communication measures, two thirds (or more) of providers rate TEQSA's performance as either 'excellent' or 'good'. TEQSA continues to be most well-regarded in guidance and good practice notes.

Perceptions of the usefulness of TEQSA's performance of TEQSA-facilitated workshops and webinars to discuss regulatory requirements and quality issues is a particular standout this year. TEQSA's top two box rating on this metric has significantly improved since 2022 and is now at a series high. However, there remains appetite for more opportunities for in-person round tables or forums where providers and TEQSA can share knowledge and discuss regulatory requirements and quality issues.

Also of note is perceptions of TEQSA's 2022 conference, which received the highest portion of 'excellent' ratings (28%) compared to all other communication items.

TEQSA continues to rate lowest on timeliness



Of all metrics evaluated, TEQSA's most poorly rated measures continue to relate to timeliness:

- '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' (42%).

Performance perceptions on the aforementioned lowest rated metrics show no signs of improvement. Ratings for both have remained at that level since tracking commenced.

That said, it is worth noting that there are some improvements observed relating to other areas of timeliness.

 With respect to both TEQSA and CRICOS applications, perceptions of timeliness of feedback from TEQSA about applications have improved in the last year by at least 10 percentage points.



More positive perceptions of feedback processes following risk assessment this year



Just over seven in ten providers (72%) rate TEQSA as either 'excellent' or 'good' on 'providing your organisation with the opportunity to give feedback on

the annual risk assessment process', making it the top-rated consultation measure this year. Since 2022, perceptions of TEQSA's performance here has improved by 14 percentage points.

While a majority of providers consider TEQSA's performance on most feedback opportunities and processes as 'excellent' or 'good', there remains high proportions of 'not applicable' ratings on many consultation items. Some providers still claim their feedback is not sought on the measures being evaluated.



TEQSA's performance on 'listening to your organisation's views on ways to reduce regulatory administrative burden' remains the lowest rated

consultation metric – where less than half of providers offer 'excellent' or 'good' ratings (44%). Some say they are not seeing enough evidence of the regulatory burden reducing.

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



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

In contrast, less than half provide an 'excellent' or 'good' rating on the usefulness of advice and support relating to the introduction of increased cost recovery (49%) and when using updated forms within the Provider Portal (44%).



General deterioration in perceptions of regulatory processes and activities

Perceptions of TESQA's performance on most metrics relating to this area have declined in the past year. Though most metrics are rated 'excellent' or 'good' by at least half of providers, declines in relation to regulatory approach items this year are part of a broader trend of decline over time that TEQSA should seek to mitigate against.

While still TEQSA's most positively rated measure relating to regulatory activities, perceptions of conduct towards providers has significantly declined this year:



78% of providers rate TEQSA's performance on treating them with **politeness and respect** as 'excellent' or 'good' – 11 percentage points lower than in 2022. The decline sees ratings on this measure reach a series low.

Despite this, three quarters of providers agree (75%) that TEQSA staff reflect TEQSA's values of trust, respect, accountability and collaboration (evaluated for the first time this year).

Consistent with previous years, TEQSA's regulatory performance is perceived to be stronger on a sectorwide basis, as opposed to helping and strengthening an individual organisation's capacity.

Established downward trend apparent relating to monitoring quality



Perceptions of the *quality* of TEQSA's feedback on whether an organisation is meeting expected standards has now been declining for three consecutive

years (60% rated performance here as either 'excellent' or 'good' in 2019, 58% in 2021, 54% in 2022 down to 45% this year).

Perceptions of both the 'timeliness of TEQSA' feedback on whether an organisation is meeting expected standards' and on TEQSA's performance on 'suggesting networks and resources that your organisation might use to improve performance' have not seen any real improvement since tracking commenced. The top two box rating for both remains under 50%.



Perceptions of clarity on some items relating to applications showing signs of deteriorating

With respect to both TEQSA and CRICOS applications, perceptions of:

- · the clarity of the application guide
- clarity of the assessment scope and evidence requirements
- the usefulness of information about how to prepare an application ...

.... are trending downwards incrementally over time.

'Excellent' and 'good' ratings on each metric, for both TEQSA and CRICOS applications, are now at a low point. Typically, these items have been the strongest rated aspects of the application process.

Consistency in case manager contacts is growing

This year, 39% of providers say they experienced changes to their case manager contact in the past 12 months. This compares to 47% in 2022 and 63% in 2021.

Despite this positive trend, there are examples of providers who are unsure if they have a current case manager assigned. Others say they have not heard from their case manager in over a year.

Cyber security remains greatest perceived threat to sector



More than three quarters of providers (78%) rate cyber security as a 'high threat' – an increase of 12 percentage points since 2022.

Artificial intelligence and impact on academic integrity a risk to the sector



Evaluated for the first time this year, two thirds of providers consider AI and its impact on academic integrity a 'high threat' to the sector (66%).

This sentiment is reinforced by commentary from providers in open-ended responses. That said, there is a great sense of appreciation for TEQSA's approach to tackling this issue to date, and support for a continuation of this approach moving forward.

Threat of regulation impeding innovation and student safety and wellbeing declining

After trending upwards in recent years, the perceived threat level of these risks to the sector has dropped significantly. The proportion of providers who consider each to be a 'high threat' to the sector is at a low point.

Considerations and opportunities



Continue to address the threat of AI

Evaluated for the first time this year, two thirds or providers consider AI and its impact on academic integrity a high threat to the sector. Providers express an appreciation for TEQSA's work so far in this area. They hope that TEQSA continues to understand risks AI poses to the sector and provide guidance on what this means for institutions.

Case managers impact providers experiences with the regulator

TEQSA's overall performance rating has declined this year along with perceptions of other KPI metrics. As case managers are often seen as the conduit between TEQSA and providers, improving provider experiences with case managers may help providers feel more satisfied with the regulator's performance.

Be mindful of downward trends

Perceptions of TEQSA's performance on regulatory activities, the quality of TEQSA's feedback on whether an organisation is meeting expected standards, usefulness of information about how to prepare an application and the clarity of the application guide, assessment scope and evidence requirements are areas to watch.

Continue to improve efforts on timeliness

Perceptions of some metrics relating to timeliness metrics have improved but there is more work to be done. Minimising the time taken between submitting an application and receiving a regulatory decision, and timely feedback on whether an organisation is meeting expected standards is where TEQSA is rated lowest overall.

Desire for more collaboration with TEQSA and other providers

Some feel that the culture of TEQSA has shifted and the approach towards providers can be punitive rather than collaborative. There is an opportunity for TEQSA to facilitate more in-person forums where TEQSA and providers alike can share ideas and knowledge, helping providers to feel that TEQSA is approachable.





Section highlights: KPIs and overall performance



Perceptions of TEQSA's overall performance has declined

Following years of consistency, perceptions of TEQSA's overall performance have declined this year. Two thirds of providers (66%) rate TEQSA's overall performance as 'excellent' or 'good' – representing a 10 percentage point drop since 2022. This is the first time overall performance ratings have declined since 2018. Issues regarding culture, consultation, timeliness and/or consistency may be contributing.

Perceptions of most individual KPIs are either stable or have declined

The proportion of providers who rate TEQSA as 'excellent' or 'good' on communication, compliance and monitoring, and Impact A (upholding quality standards with a proportionate approach to managing risks and supporting the sector to comply and improve) is in line with 2022 results – having only fluctuated a single percentage point at most. All other KPIs have declined, with one exception.

Efforts on continuous improvement have rebounded

Perceptions of TEQSA's performance on continuous improvement have somewhat recovered following a significant decline in 2022. While 'excellent' and 'good' ratings on this KPI are not yet back to previously seen levels, TEQSA appears to have been able to stem the downward trend in perceptions. Continuous improvement also represents the only KPI this year to see an increase in 'excellent' and 'good' ratings.

Summary of KPIs



% Total excellent + good*



performance





Risk approach



Approach

Continuous improvement



Compliance and monitoring

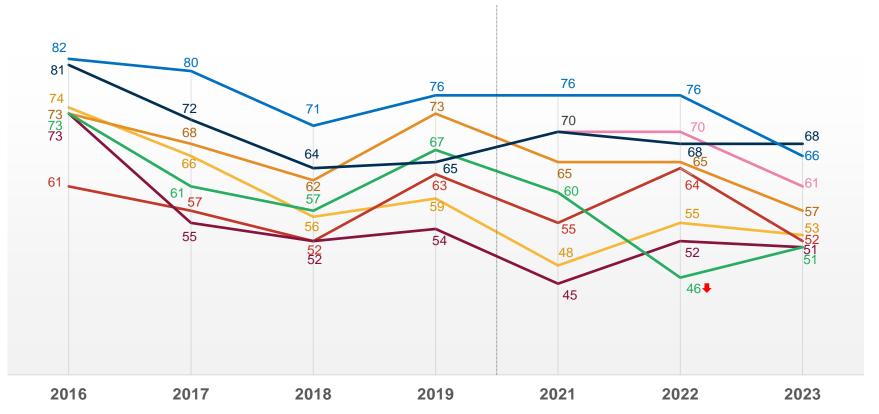




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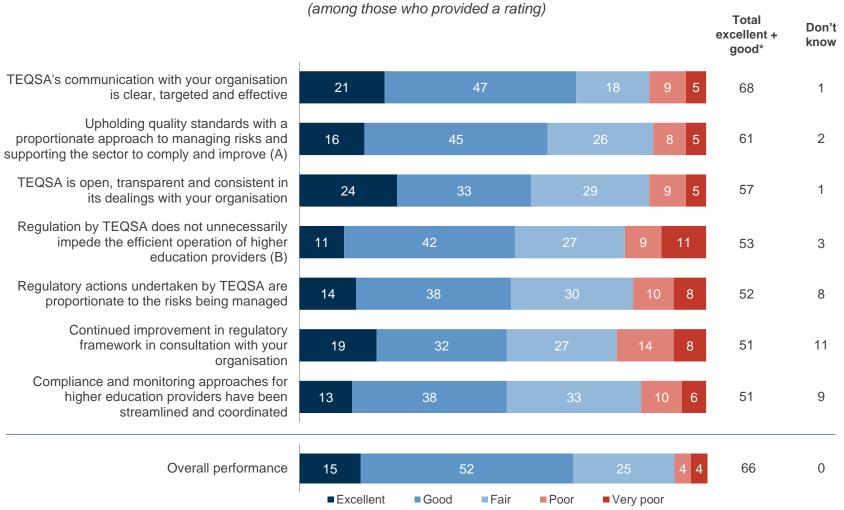


Don't know responses have been excluded from the 'Total excellent + good' calculation. Please note that in 2020, the annual TEQSA Stakeholder Survey was not conducted. Please note that 'Impact A' was a new KPI metric in 2021.

Perceptions of KPIs and overall performance



KPIs and overall performance (%)



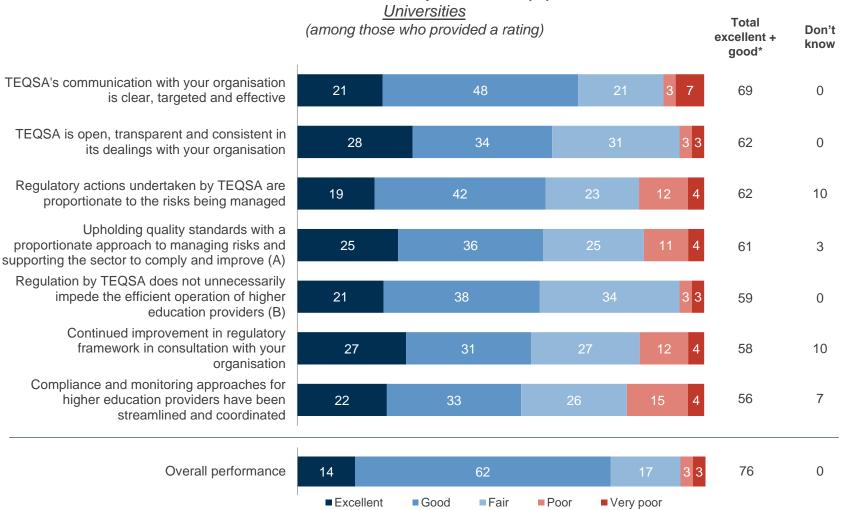
Q1. Please rate TEQSA's performance over the last 12 months on each of the following indicators / Q. How would you rate TEQSA's performance over the last 12 months as the regulator assuring the quality of Australian higher education Base: All respondents (n=95).

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

Perceptions of KPIs and overall performance: among <u>universities</u>



KPIs 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).

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

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



KPI and overall performance (%)

Institute of higher education **Total** (among those who provided a rating) Don't excellent + know qood* TEQSA's communication with your organisation 22 2 68 is clear, targeted and effective Upholding quality standards with a proportionate approach to managing risks and 12 62 6 2 supporting the sector to comply and improve (A) TEQSA is open, transparent and consistent in 23 6 55 2 11 its dealings with your organisation Regulation by TEQSA does not unnecessarily impede the efficient operation of higher 6 44 14 51 5 education providers (B) Compliance and monitoring approaches for higher education providers have been 8 41 49 11 streamlined and coordinated Regulatory actions undertaken by TEQSA are 11 10 48 8 36 proportionate to the risks being managed Continued improvement in regulatory framework in consultation with your 15 47 11 10 32 organisation Overall performance 15 62 0

Good

■ Excellent

Poor

Very poor

Fair

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).

Positive comments about TEQSA's performance are often linked to good relationships with case managers



When given the opportunity to provide feedback on TEQSA's KPIs and general performance in the last 12 months, those who provide positive comments often mention the fact that they appreciate their case manager's responsiveness, knowledge and support.

In contrast, those who express dissatisfaction through comments provided appear to have the opposite experience – with little communication from their case manager.

Interactions with case managers appear to be instrumental in how providers perceive TEQSA's performance.

Given the variation in experiences with case managers, there may be an opportunity for TEQSA to learn from what has worked well to ensure providers' needs are fulfilled by case managers including through:

- face to face interactions with case managers
- case managers having an understand of the provider they are working for
- proactive communication with providers not just when an issues arises
- provision of timely responses to provider queries.

Providers are most happy when TEQSA is seen as supportive, fair and reasonable towards them.

"Our experience with TEQSA over the last 12 months has been very positive. Communication with the case managers and assessment managers has been great as we have received timely responses from them."

"Our TEQSA contact person has to refer upwards for advice and decision and time frame is unclear, which creates uncertainty at our end."

"Interaction with TEQSA in the last 12 months has been positive. Case managers and other supportive staff have demonstrated a pro-active relationship with the institution, providing the highest level of academic and administrative support and advice. Where concerns of both parties have been expressed it has been done so in an environment of mutual respect and desire for the most positive outcome for the institution within the highest standards of the Australian education framework."

"High staff turnover, particularly changes in case managers, and poor communication unfortunately negatively impacts TEQSA's reputation however the proactive leadership on sector-wide emerging and current risks is appreciated."

"I have had excellent relationship and communication with TEQSA and its case manager and I have always received prompt and quality responses for all my queries."

Beyond the relationship with case managers, provider concerns primarily relate to three key themes



Beyond concerns relating to case manger communications, several issues often raised in the personal comments of primary contacts are:

Deterioration in consultation and communication

There is a view among some that TEQSA's willingness to consult and collaborate with providers has declined.

Lack of timeliness

Long wait times for regulatory decisions, reaccreditation and re-registration make things particularly hard for providers.

Inconsistency

Lack of coordination and/or consistency in responses between TEQSA staff and between TEQSA and other agencies that need to work together.

Perceived prevalence of these issues can undermine providers' trust in TEQSA.

"Our institution previously had a very open and transparent partnership with TEQSA. We have been very successful in working closely with TEQSA to remain compliant and have been open to feedback and continued improvement. Over the past 18 months TEQSA's approach to collaboration and consultative practices has disappeared. Case managers are difficult to contact, not willing to have discussions to collaborate and find transparent solutions for improvement. Outcomes have been disproportionate to the risk which appears to be due to attempting to reduce TEQSA workload. The relationship which was once fruitful for continued improvement for both parties is now unclear, guarded and not focused on solutions for continued improvement and discussion. Our interactions have been extremely disappointing and detrimental to our ongoing trust and partnership with TEQSA."

"There is inconsistency between different officials within TEQSA in their approach and communication. Some officials still seem to have a penalty mindset rather than a collaborative one which is disappointing. Some communications from TEQSA contain references to vague concerns which are not clarified despite several requests for clarification."

"Information on the TEQSA website regarding the process for applying for registration is very out of date, which causes confusion. The CRICOS team and the initial registration team don't appear to work effectively together. Having a completely separate process for CRICOS registration even though the requirements overlap considerably seems inefficient and is frustrating."

There is a sense among some that the culture of TEQSA and its approach towards providers needs to change



Some commentary provided talks to a shift in TEQSA's manner towards institutions or a desire for TEQSA to be more approachable and collaborative.

In essence, some feel that TEQSA appears to focus now on policing the sector rather than supporting providers to be better. Providers' relationship with TEQSA can feel punitive, resulting in institutions feeling reluctant to seek help from the regulator at the risk of being seen as non-compliant.

For some providers, this sentiment is felt through the tone of communications. For example, requests for information (RFI) can feel like TEQSA is out to catch providers doing something wrong rather than an attempt to ensure providers are the best they can be.

TEQSA is described by some as being 'guarded', which is said to be a departure from previous efforts towards continuous improvement and working side by side with providers.

Providers express a desire for TEQSA to engage in more relationship management and the pursuit of shared goals. "We worked hard to establish a positive relationship with the regulator over the last few years. We had a change in case manager and the associate director who is now involved is unnecessarily adversarial and does not work in a collaborative or respectful manner. It is disappointing that there appears to be a shift from positive engagement to suspicious punitive regulation. There are also inconsistencies in the feedback we are getting from TEQSA. I think there is much work to be done within TEQSA around relationship management. Individuals within TEQSA are undermining our trust in the regulator."

"TEQSA does not present itself to be approachable or helpful.

To ask a question or to ask for help is to take the risk of being considered to be incompetent or non-compliant. It is very difficult to see TEQSA as anything but the regulator. Some of the more useful engagements e.g. about ChatGPT were beneficial but these were conducted by university/higher education practitioners rather than TEQSA's staff."

"Relationship with TEQSA should be collegial and cooperative with the shared aim of achieving compliance and continuous improvement, sometimes it can be seen as dismissive, punitive and based on prior scenarios/lack of trust rather than recognising the change and continuous improvements that have been made in response to prior decisions, etc. We are working collectively to ensure the best for our students and Australia's educational reputation – lets do that as a team effort where we work together to achieve shared goals relevant to our sectoral situations."

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



"Overall, I think TEQSA is doing an excellent job and needs to continue on its path of risk-based assessment, including minimising the impact of the seven year re-registration cycle."

"I have been disappointed with the lack of consultation and guidance for an institution which has gone through its biggest regulatory review in its history. Lack of transparency, collaboration and partnership."

"There has been a lot of talk from the senior leadership about reform, moving faster, being more supportive of providers, wanting to see more SAAs approved. But that is not reflected in our day to day dealings with TEQSA. Nothing has changed."

"Overall I have been happy with TEQSA's performance. Knowledge and experience of TEQSA staff remains an issue related to high turnover. Timeliness of assessment outcomes clearly remains a challenge. There is also sometimes a disconnect between proclamations of the leadership (e.g. focus on self assurance) verses the implementation by more junior staff (e.g. insistence on evidence in specific formats)."

"TEQSA has an impossible task and I appreciate the challenges its staff face daily, particularly in working with non-self-accrediting providers. I am concerned however at the length of time for regulatory decisions around major processes (renewal of registration, change of provider category) as it affects the fundamental architecture of our national education system. There seems to be an issue with staff turnover in TEQSA and I wonder if some ministerial level conversation is needed about resources and culture."

"Very minimal contact with our organisation in last 12 months, despite submitting renewal of registration eight months ago we have heard nothing; only contact with TEQSA is the annual provider risk report and letting us know of a change of case manager."

"My personal experience of TEQSA's regulatory processes and actions has changed from burdensome and difficult to more co-operative and supportive. This has included direct personal contact that has been helpful."

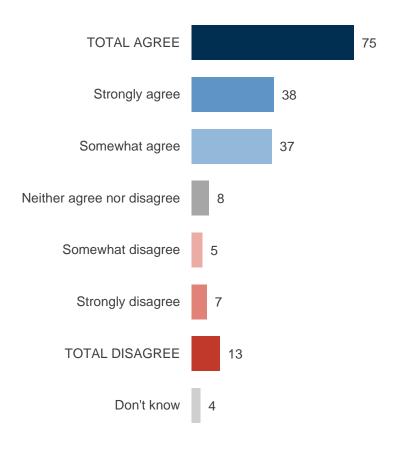
"TEQSA releases very helpful information (guidance notes, etc). We have an inconsistent experience of TEQSA staff and reviewers for formal processes such as accreditation or renewal, and comments from reviewers often demonstrate that they do not understand our operating environment."

"TEQSA does an excellent job. Staff are knowledgeable and helpful. The last 12 month has created challenges for the whole sector and TEQSA has been pragmatic. Some areas for improvement are: Clear guidelines and timely responses to emails. Follow up reminders are sent to receive advice, and the general enquiries line 1300 739 585 or 0437 390 024 is not manned and never answered. Conduct more consultation on compliance guidance notes with input from providers, this will help with the regulators understanding of issued faced by the providers. TEQSA conference has lost its appeal, it's become more commercial now – bring back the good old days of providing guidance and allowing networking. Wait times could be improved."

Three quarters of providers agree that TEQSA staff reflect TEQSA's values



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



Many providers agree TEQSA staff reflect the regulator's values but some have reason to disagree



Most providers agree (75%) that TEQSA staff reflect TEQSA's values of trust, respect, accountability and collaboration – including 38% who strongly agree. For those that agree, TEQSA's values are displayed by TEQSA staff (including Commissioners) at public events but also through individual interactions with TEQSA staff.

Just 13% disagree that TEQSA staff reflect TEQSA's values. Reasons for disagreeing include the fact that:

- TEQSA has an evidence-based regulatory approach, meaning institutions must provide evidence of their compliance – they are not trusted to be compliant
- TEQSA's response to providers is often slow which is not showing respect to institutions or being accountable
- TEQSA is perceived to lack trust in some providers for no apparent reason
- smaller providers feel they do not have the same opportunities for collaboration with TEQSA compared to larger institutions.

"The Values have been demonstrated by the (Chief)
Commissioners when speaking at various forums, and in
discussing TEQSA's future direction / strategy. There is a
sense that TEQSA is collaborating in earnest with the sector to
ensure trust and respect."

"Individual communication and requests for advice/ consideration are professional and embody all the values espoused by TEQSA."

"With an evidence-based regulatory approach, it is difficult to appreciate the value of trust. In the context of collaboration – perhaps this is more prevalent between TEQSA and the larger universities. Small independent providers do not enjoy this sense of collaboration."

"Issues with communication overall and poor or no responses from some individual staff members unfortunately does not engender a sense of respect or accountability."

"TEQSA's lack of accountability creates a culture of disrespect where trust is undermined."

"TEQSA wields power and disperses it in unpredictable ways at times that seems to follow no rationale or logic other than—'we don't trust you as an organisation, even though we don't take the time to get to know you, instead we'll make assumptions that you don't measure up'. Collaboration is not the standpoint and I have yet to see a situation where they have been held accountable. Fear does not equal respect (from provider to TEQSA) and without trust from TEQSA to provider there can be no respect."



Overview

Section highlights: Overview



Information provision is where TEQSA performs best

Comparisons across all of TEQSA's individual metrics evaluated show that provision of information (good practice and guidance notes) and the usefulness of communications (such as feedback from TEQSA on CRICOS applications and TEQSA-facilitated workshops and webinars) are where the regulator is most positively rated.

Measures relating to timeliness remain TEQSA's lowest rated areas The time taken between submitting an application and first receiving a regulatory decision and provision of timely feedback on whether an organisation is meeting expected standards continue to be the greatest areas of concern. Perceptions of TEQSA's timeliness in providing feedback about a TEQSA application has improved this year, though it is still a lower-rated aspect overall.

In the main, universities remain more complimentary than other providers

Consistent with previous years, on most measures evaluated, including overall performance, universities rate TEQSA's performance higher than other providers.

Interpreting the overview analysis



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

| Communication |
|-------------------------------------|
| Consultation |
| Cost recovery |
| Regulatory processes and activities |
| Monitoring quality |
| Applications |
| TEQSA's case management |

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

Performance



| % Excell | ent + good* | Universities | Institutes of Higher Education |
|---|-------------|--------------|-----------------------------------|
| Usefulness of the information on the HES Framework (Threshold Standards) 2021 in the form of the guidance notes | 87 | 7 86 | 88 |
| Usefulness of the information contained within the good practice notes | 86 | 90 | 85 |
| Usefulness of feedback from TEQSA about your application (CRICOS) | 82 | 80 | 83 |
| Usefulness of TEQSA-facilitated workshops and webinars to discuss regulatory requirements and quality issues | 80 | 85 | 77 |
| Usefulness of information provided on the National Register (showing the results of regulatory decisions) | 78 | 92 | 72 |
| Treating you with politeness and respect | 78 | 89 | 73 |
| Providing opportunities to address matters relevant to a regulatory decision, prior to a final decision being made | 77 | 73 | 78 |
| Usefulness of information on TEQSA's regulatory policies and processes - provided through TEQSA's website and newsletters | 76 | 76 | 76 |
| Using a variety of media and channels to communicate sector-wide updates | 75 | 74 | 75 |
| Usefulness of meetings and/or phone calls with your case manager | 73 | 68 | 75 |
| Providing your organisation with the opportunity to give feedback on the annual risk assessment process | 72 | 78 | 69 |
| Being responsive to your organisation's needs | 69 | 71 | 68 |
| Usefulness of the TEQSA 2022 Conference | 67 | 72 | 64 |
| Facilitating / helping the sector, as a whole to protect students | 67 | 79 | 62 |
| Clarity of the assessment scope and evidence requirements (CRICOS) | 67 | 71 | 66 |
| Clarity of the application guide (easy to understand) (CRICOS) | 67 | 65 | 68 |
| Dealing with your organisation efficiently | 67 | 73 | 64 |
| Listening to your organisation's views on improving quality assurance (e.g. feedback on guidance notes and other regulatory material / information) | 66 | 78 | 59 |
| Usefulness of the information on changes to TEQSA's fees and charges | 66 | 69 | 64 |

Application matters and regulatory processes are TEQSA's mid-tier performers

Performance (cont'd)



| % Excellen | t + good* | Universities | Institutes of higher education |
|--|-----------|--------------|--------------------------------|
| Helping the sector, as a whole deliver quality higher education | 66 | 72 | 63 |
| Listening to your organisation's views on better ways to protect student interests | 65 | 62 | 66 |
| Clarity of the application guide (easy to understand) (TEQSA) | 65 | 70 | 64 |
| Usefulness of feedback from TEQSA about your application (TEQSA) | 65 | 50 | 69 |
| Timeliness of feedback from TEQSA about your application (CRICOS) | 65 | 68 | 63 |
| Usefulness of information about how to prepare an application (CRICOS) | 65 | 68 | 63 |
| Clarity of the assessment scope and evidence requirements (TEQSA) | 63 | 60 | 65 |
| Usefulness of information on how to prepare an application (TEQSA) | 62 | 64 | 62 |
| Helpfulness of information on how to use the provider portal (for preparing and submitting applications online) (CRICOS) | 62 | 63 | 62 |
| Being fair and reasonable | 61 | 71 | 56 |
| Providing appropriate knowledge to support your organisation's self-assurance | 61 | 71 | 56 |
| TEQSA's revised approach to case management | 61 | 71 | 57 |
| Providing your organisation with the opportunity to give feedback on application processes | 60 | 58 | 60 |
| Being encouraging without setting up unrealistic expectations | 60 | 57 | 61 |
| Tailoring an application process to meet your needs | 59 | 71 | 56 |
| Usefulness of the advice and support in relation to the reduction of administrative regulatory burden (including initiatives in response to the ongoing nature of the COVID-19 pandemic) | 57 | 54 | 59 |
| Helping the sector, as a whole to manage risks | 57 | 62 | 55 |
| Usefulness of the annual health check phone call | 57 | 50 | 59 |

Timeliness aspects remain where TEQSA's performance rates lowest



| | nce (cont'd) ent + good* | Universities | Institutes of Higher Education |
|---|-----------------------------|--------------|-----------------------------------|
| Helping your organisation deliver quality higher education | 56 | 67 | 52 |
| Demonstrating an understanding of your organisation's business or operating environment | 56 | 57 | 56 |
| Strengthening your organisation's capacity to protect students | 55 | 65 | 50 |
| Having an accountable regulatory process where decisions are transparently justified | 54 | 54 | 54 |
| Demonstrating an understanding of your organisation's specific needs | 54 | 53 | 55 |
| Explaining clearly and constructively why decisions were made | 53 | 44 | 56 |
| Providing your organisation with the opportunity to give feedback on cost recovery implementation | 52 | 48 | 54 |
| Usefulness of the advice and support in relation to the introduction of increased cost recovery | 49 | 38 | 53 |
| Strengthening your organisation's capacity to manage risks | 49 | 52 | 48 |
| Being consistent and clear about the goal posts for successful decision outcomes | 49 | 65 | 43 |
| Giving timely feedback to save your organisation using its resources on applications that are unlikely to be successful | 46 | 50 | 45 |
| Timeliness of feedback from TEQSA about your application (TEQSA) | 46 | 33 | 49 |
| Suggesting networks and resources that your organisation might use to improve performance | 45 | 60 | 38 |
| Providing quality feedback on whether your organisation is meeting expected standards | 45 | 48 | 44 |
| Listening to your organisation's views on ways to reduce regulatory administrative burden | 44 | 40 | 46 |
| Usefulness of advice and support when using updated forms within the Provider Portal | 44 | 39 | 45 |
| Providing timely feedback on whether your organisation is meeting expected standards | 42 | 44 | 42 |
| Minimising the time taken between applying and first receiving a regulatory decision | 40 | 53 | 35 |

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Section highlights: Communication



All communication items remain well-regarded

On all communication measures evaluated, at least two thirds of providers rate TEQSA's performance as either 'excellent' or 'good'. Perceptions of most communication measures have improved since 2022 or have remained stable. The proportion who rate TEQSA's performance on any communication item as 'poor' remains negligible.

One communication metric is trending down

The proportion of providers who rate the usefulness of information on TEQSA's regulatory policies and processes provided through TEQSA's website and newsletters as either 'excellent' or 'good' has been incrementally trending downwards over time (with the exception of one statistically significant decline in 2021). Though still well-rated, TEQSA should be mindful of abating this trend.

The TEQSA 2022 conference appears to have been a success

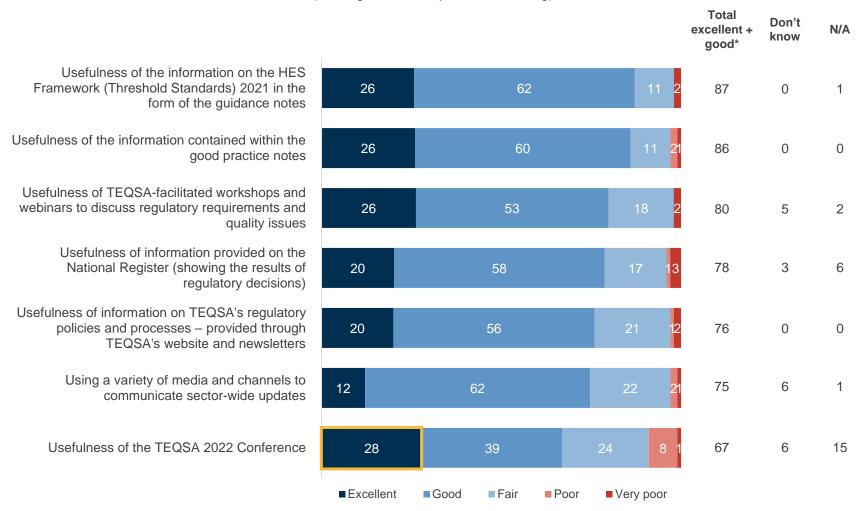
The usefulness of the TEQSA 2022 conference garners the highest portion of 'excellent' ratings (28%) compared to all other communication items. Other TEQSA-facilitated forums have also performed well this year. 'Excellent' or 'good' ratings for the usefulness of TEQSA-facilitated workshops and webinars to discuss regulatory requirements and quality issues improved by a significant 20 percentage points.

Good practice and guidance notes remain highly valued communication items



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

(Among those who provided a rating)



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=95).

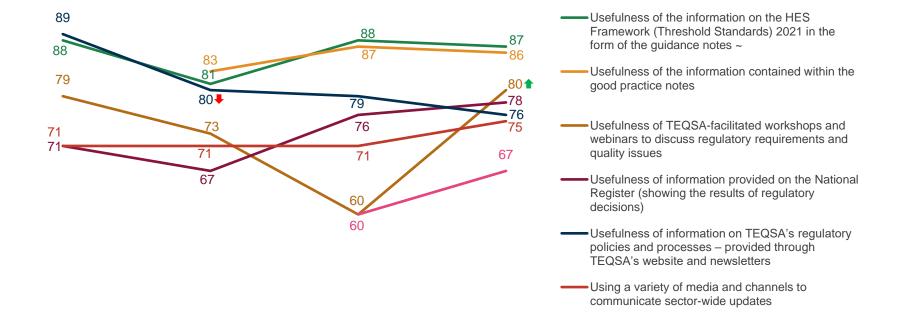
^{*} Don't know and not applicable responses have been excluded from the 'Total excellent + good' calculation.

Communication



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

(Among those who provided a rating)



2019 2021 2022 2023 Usefulness of the TEQSA 2022 Conference

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

Base: Respondents who provided a rating - 2023 (n=75-95); 2022 (n=73-96); 2021 (n=115-126); 2019 (n=125-140).

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



Consultation

Section highlights: Consultation



Feedback processes following risk assessment have improved

Almost three quarters of providers rate TEQSA as 'excellent' or 'good' on providing them with the opportunity to give feedback on the annual risk assessment process (72%) – an improvement of 14 percentage points since 2022. Other consultation metrics have relatively high proportions of don't know and N/A ratings suggesting not all participate in or are afforded feedback opportunities on other matters.

Positive signs on improving quality assurance and protecting student interests

TEQSA's performance ratings on listening to providers' views on improving quality assurance and on better ways to protect student interests have improved for two consecutive years. 'Excellent' and 'good' ratings on these metrics are both at their highest points in four years.

Performance in reducing administrative burden continues to rate lower

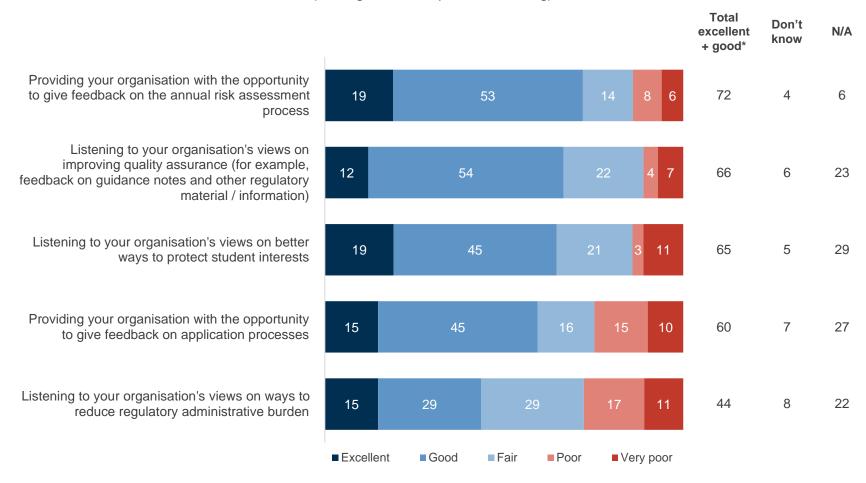
Again this year, the only consultation measure where less than half of providers (44%) rate TEQSA's performance as either 'excellent' or 'good' is the measure of 'listening to your organisation's views on ways to reduce regulatory administrative burden'. The proportion of 'poor' or 'very poor' ratings on this measure have also increased since 2022 (from 20% to 28%). Some claim there is not enough evidence of a reduction in the regulatory burden.

Provision of feedback opportunity following annual risk assessment is the top-rated consultation metric this year



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=95).

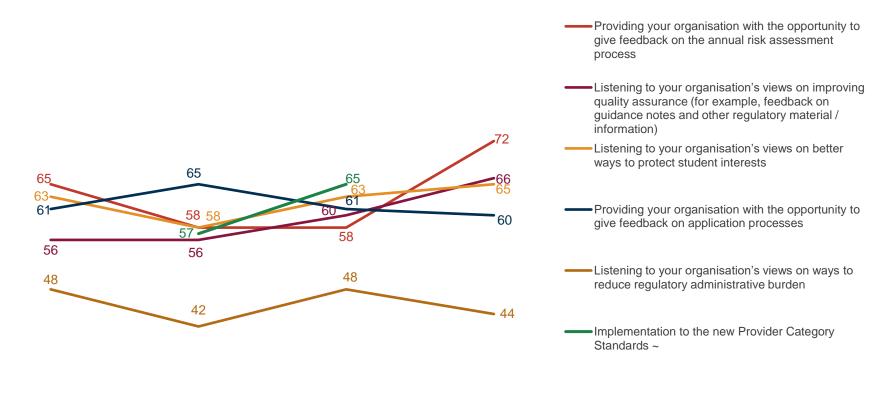
^{*} Don't know and not applicable responses have been excluded from the 'Total excellent + good' calculation.

Consultation



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

(Among those who provided a rating)



2023

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:

2022

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

2021

2019

^{*} 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.

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



With ratings of TEQSA's consultation metrics either relatively stable or improved this year, there are fewer comments provided that relate to TEQSA's performance on these measures.

There does however remain high degrees of 'don't know' and 'not applicable' responses to most consultation metrics (with the exception of feedback on the annual risk assessment process) which suggests there are many providers who still believe they have not had the opportunity to be consulted on those matters or have not needed to. Verbatim feedback on TEQSA's consultation performance reflects this sentiment.

Some who have been consulted but provide a response of 'very poor' say TEQSA does not appear to want to listen to individual organisations or be genuinely interested in feedback provided. There can also be a lack of perceived action resulting from feedback which contributes to these feelings.

Performance in reducing administrative burden continues to rate lower. Some providers say that there is simply no evidence of TEQSA reducing the regulatory burden imposed on them.

"Responses of don't know indicate times when I do not recall our institution being consulted to offer feedback on the process. Responses of very poor reflect my experience in TEQSA's ability to listen – I have not experienced them as an organisation that will listen to an individual provider but will listen when presented with a group of providers ... responses of fair – this reflects a time when it appears that TEQSA will listen – when they collect feedback on guidance notes."

"When our institution indicated issues with application guides and templates, and made suggestions on how improvements could assist providers, there was not a lot of genuine interest and nor was there any action on those suggestions. It is not clear if TEQSA has good sight of how these information sources and platforms look from the provider perspective to ensure an end user experience."

"I don't think we were given a chance to provide feedback."

"We were not approached on any of these matters."

"Our case manager left several months ago and has not yet been replaced. N/A for some statements as we have not been engaged in these discussions."

"Not enough information or evidence of reducing regulatory burden."

Nominated TEQSA-specific reporting burdens that providers feel could be lifted reflect last year's sentiment



'Listening to your organisation's views on ways to reduce regulatory administrative burden' remains the only consultation measure where less than half of providers (44%) 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' many say there are none they can think of. Among those who can, responses are mostly in line with 2022 and include:

- 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
- RFIs (there is a perception among some they are increasing)
- financial reporting requirements.

Only when TEQSA provides feedback on information or reports provided do institutions feel like their efforts in supplying that information was worthwhile. Not hearing back from TEQSA once information is provided can lead them to feel like it is a useless exercise imposing an unnecessary burden on providers.

"The staff PIR data collection is very time consuming ... the level of detail and information required takes months to compile each year. We start our PIR collection each year in June for an August submission and don't see the data reflected in a risk assessment for up to two years."

"PIR reporting. Being able to adapt previous submissions would be extremely beneficial."

"TEQSA is imposing material change burdens on the sector which overreach their legislative rights."

"Reporting GOS and PIR staff data. Make it consistent within TCSI and avoid double handling of information and data."

"RFIs. Seemingly out-of-the-blue requests which require institutions to focus on collating information and responding rather than core business. Responses to which are typically short, have no value and demonstrate little understanding of the burden these requests impose."

"We never get any feedback on reports submitted so not even sure if anyone is looking at them. If TEQSA doesn't absolutely need reports in direct relation to a pressing concern they shouldn't request them."

"The RFIs that come across from TEQSA seem to be as a result of a lack of cross checking. If assessors and case managers check previous correspondence we would not have to keep resubmitting the same information for RFIs."

"... RFIs have increased – seems like they are being created to enable fees to be charged."



Cost recovery implementation

Section highlights: Cost recovery implementation



Usefulness of information on changes to TEQSA's fees and charges well-regarded

Two thirds of providers (66%) consider the usefulness of the information on changes to TEQSA's fees and charges as either 'excellent' or 'good'. This is by far the most well-regarded metric evaluated relating to cost-recovery.

Advice and support offered are lower-rated metrics

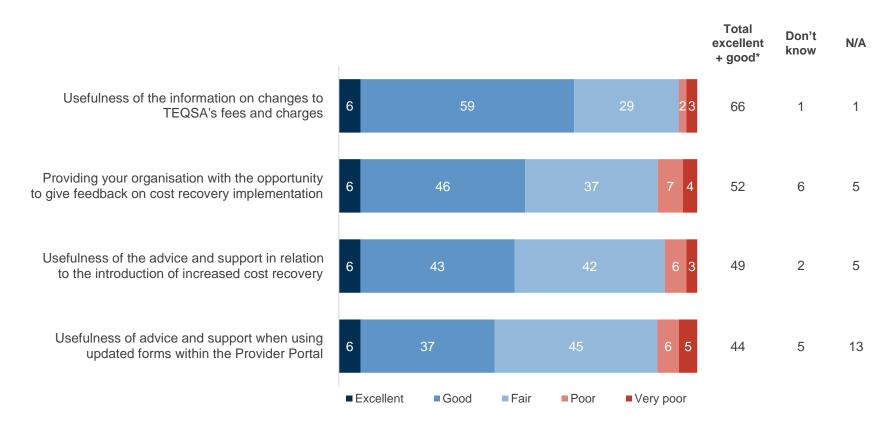
The usefulness of TEQSA's advice and support in relation to the introduction of increased cost recovery and when using updated forms within the Provider Portal are the only two cost recovery metrics where less than half provide an 'excellent' or 'good' rating. The usefulness of advice and support when using updated forms within the Provider Portal is TEQSA's third lowest-rated aspect overall.

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



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

(Among those who provided a rating)



Q17. In the last 12 months TEQSA implemented increased cost recovery arrangements. As detailed in TEQSA's Cost Recovery Implementation Statement (CRIS), TEQSA will engage with the sector annually to review cost recovery arrangements. This review will take place later this year. Before we commence that review, we want to understand how well the implementation of cost recovery was communicated with the sector and where there could be any improvement. Thinking about TEQSA's communications about cost recovery, how would you rate TEQSA's performance over the last 12 months in terms of:

Base: All respondents (n=95).

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



Regulatory processes and activities

Section highlights: Regulatory processes and activities



Deterioration in ratings of TEQSA's regulatory activities performance

Since 2022, ratings on all TEQSA's regulatory activities metrics have declined, with the exception of minimising the time taken between applying and first receiving a regulatory decision. Though still well-regarded, views of TEQSA's conduct have declined significantly. Ratings of TEQSA as 'excellent' or 'good' in treating providers with politeness and respect is down a significant 11 percentage points on 2022.

A need to abate trends relating to TEQSA's regulatory approach metrics

While TEQSA's performance on most regulatory approach metrics is considered 'excellent' or 'good' by half of providers, perceptions of each have been trending downwards over time. 'Excellent' and 'good' ratings on each regulatory approach metric are now at a low point, with the exception of strengthening your organisation's capacity to protect students.

No improvement evident in the time taken to make a regulatory decision

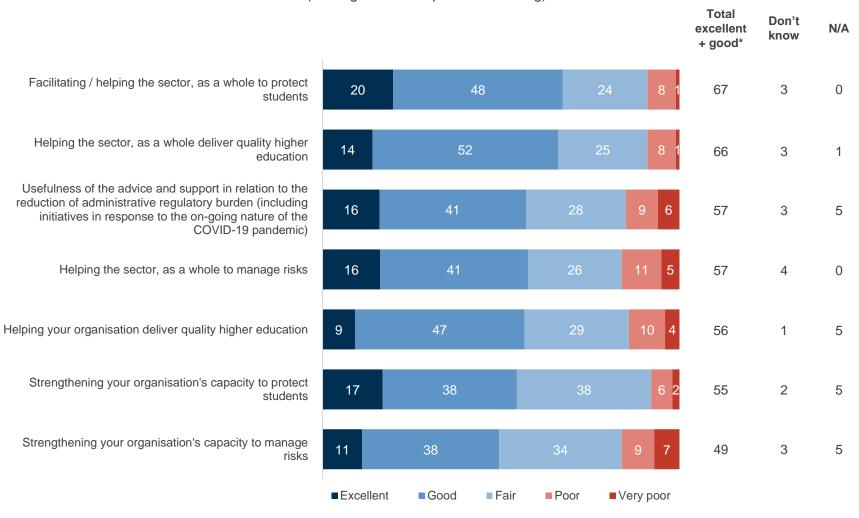
Despite perceptions of TEQSA's performance on minimising the time taken between applying and first receiving a regulatory decision being the only metric not to have declined since 2022, perceptions here have not changed in three years. This indicates providers are not seeing any improvements. The proportion of 'poor' and 'very poor' ratings on this metric are also increasing (currently 34%).

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



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

(Among those who provided a rating)



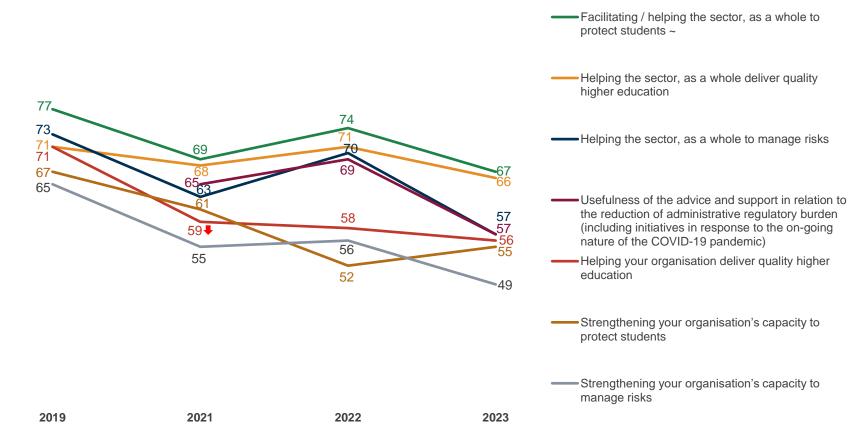
Q9a. How would you rate TEQSA's regulatory approach over the last 12 months for each of the following items: Base: All respondents (n=95).

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: Respondents who provided a rating – 2023 (n=87-92); 2022 (n=91-95); 2021 (n=112-122); 2019 (n=127-136).

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

[~] Indicates the wording of this item has changed slightly since 2022.

Significantly lower

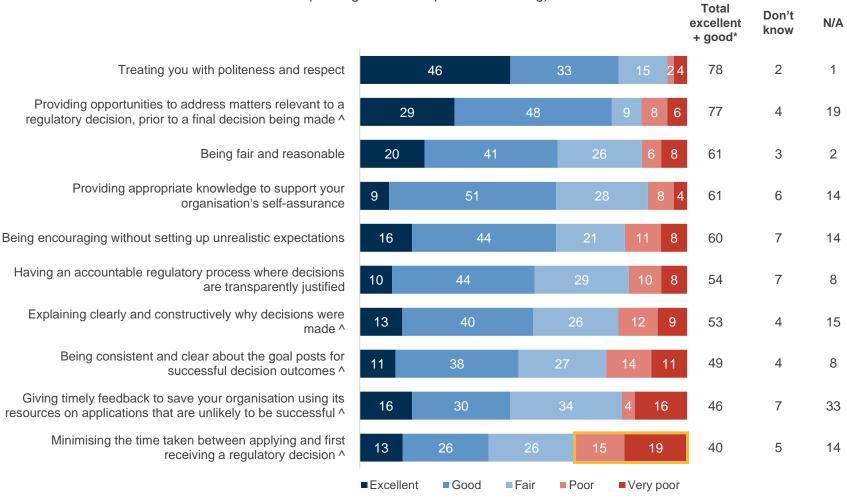
♣ than the previous years result at the 95% confidence interval.

Politeness and respect, and providing opportunities to address matters remain the best-rated regulatory activities



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

(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: All respondents (n=84-95).

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

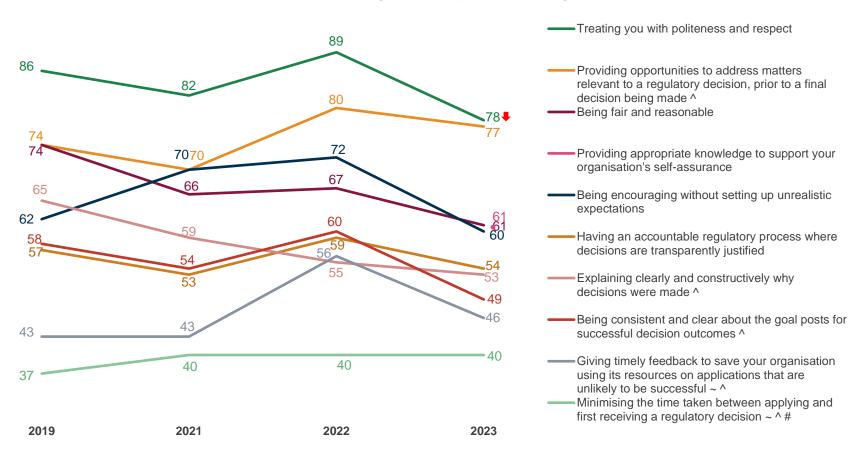
[^] Indicates that the item was only asked of those who made an application.

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

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

[~] Indicates the item was reported as part of the 'Applications to TEQSA' section in 2019. # Indicates wording change in 2023.

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

Lack of resourcing or inconsistent approaches may be contributing to decline in rating of TEQSA's conduct



TEQSA has consistently been more positively rated on sector-wide help and assistance as opposed to helping and strengthening individual organisations.

Even so, when it comes to interactions with individual organisations, almost half of providers (46%) consider TEQSA 'excellent' at treating them with politeness and respect. Some institutions provide positive comments relating to their case manager's conduct towards them.

However, it is important to note that the proportion of providers who rate TEQSA either 'excellent' or 'good' in treating them with politeness and respect is down a statistically significant 11 percentage points on 2022 (from 89% to 78%). A feeling that TEQSA staff are reluctant to help providers or too time poor to do so can affect perceptions of TEQSA's conduct.

Some find questions about TEQSA's general conduct towards providers hard to answer given they feel different staff within TEQSA operate differently. Some are perceived to take a different tone with providers compared to others. Essentially, some are finding their interactions with TEQSA and the treatment they receive inconsistent.

Other comments relating to TEQSA's regulatory activities and processes convey a perception that TEQSA is under resourced to complete these.

"The TEQSA staff in contact with our organisation have been very good and have responded politely and efficiently."

"Interaction with TEQSA case managers and assessment managers has been really great. They are prompt, friendly and respectful."

"TEQSA staff at times were hesitant to provide guidance or clarification on areas of the legislation that are broad and open to interpretation."

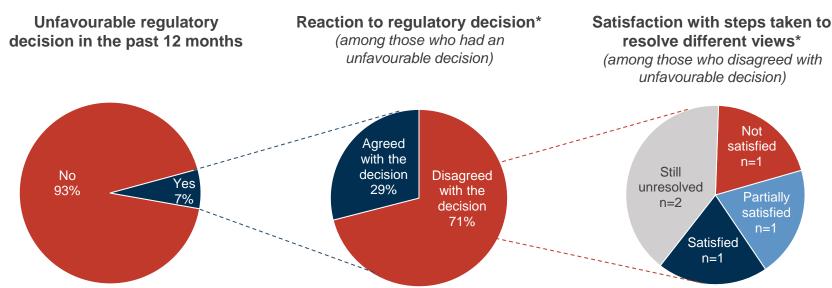
"It's unfortunate that a few individuals can sour the entire experience with the regulator. There is not consistency of approach. Some officials enjoy wielding a stick too much."

"Generally TEQSA staff are helpful. However, written correspondence from TEQSA takes an entirely different tone and sounds like it has been written by lawyers. That inconsistency between verbal interactions and written communication can be jarring."

"Previously interactions with TEQSA have been transparent and solutions driven. Over the past 18 months when we have needed guidance and support the most, TEQSA have been elusive and time constrained. This has impacted our ability to work with TEQSA to manage risk and ensure applications are as streamlined as possible for review. TEQSA staff have vocalised constraints – time, resources as reasons for poor interactions. The system is broken and having a negative impact on the institutions which have followed processes for support and guidance."

Few providers received an unfavourable regulatory decision in past year, most disagree with it





Steps were taken to resolve the matter

(Sample of feedback from those who disagreed with the decision)

"Meetings and extensive phone "Nothing from "Resubmission. TEQSA's side." calls with TEQSA staff."

"Received a notice of a pending decision with a request comment on identified non or partial compliance to a couple of standards before making a final decision to grant accreditation for a new course ... responded in detail and ... currently awaiting a decision."

Q15d. Have you had a regulatory decision that was unfavourable to your organisation in the past 12 months? / Q15e. What was your reaction to this regulatory decision? / Q. What steps were taken to resolve this matter? / Q15q. How satisfied were you with the steps taken to resolve your and TEQSA's different views?

Base: All respondents (n=95); those who had an unfavourable decision (n=5), those who disagreed with an unfavourable decision (n=5).



Monitoring quality

Section highlights: Monitoring quality



Quality of feedback on adherence to standards appears to be deteriorating Typically, a majority of providers have rated TEQSA's performance on providing *quality* feedback on whether their organisation is meeting expected standards as either 'excellent' or 'good'. This year, 45% provide an 'excellent' or 'good' rating on this metric. Perceptions of TEQSA's performance here have trended downwards over time (down from 60% back in 2019).

The timeliness of TEQSA feedback still an issue

Provider perceptions of TEQSA's performance on providing *timely* feedback on whether an organisation is meeting expected standards do not appear to be improving. Just over four in ten providers have rated TEQSA's performance on this metric as either 'excellent' or 'good' for several consecutive years. There is a view TEQSA is under-resourced.

Opportunity to increase awareness and satisfaction with resources to improve performance

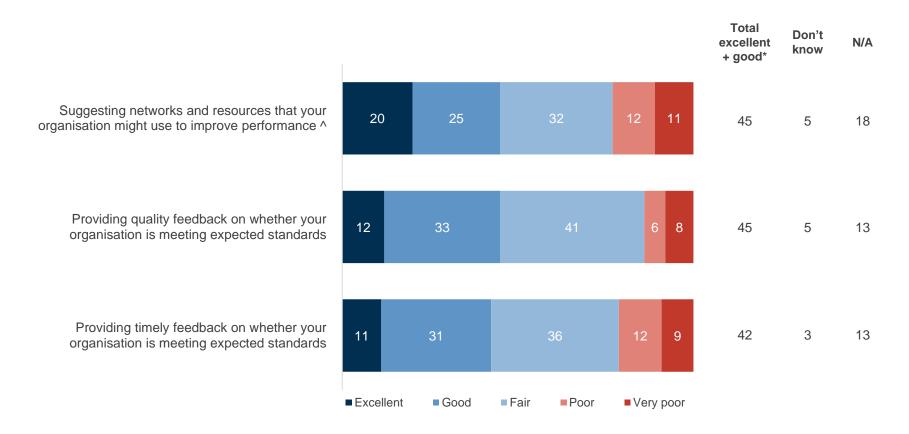
A relatively high number of providers remain unable to rate TEQSA on 'suggesting networks and resources that your organisation might use to improve performance' because it is 'not applicable' (18%). Concurrently, among those who can rate performance, satisfaction with these resources is unchanged (less than half rate TEQSA as 'excellent' or 'good' here).

Less than half of providers rate TEQSA's performance on all monitoring quality aspects as 'excellent' or 'good'



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

(Among those who provided a rating)



Q10. How would you rate TEQSA's performance over the last 12 months for... Base: All respondents (n=84-95).

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

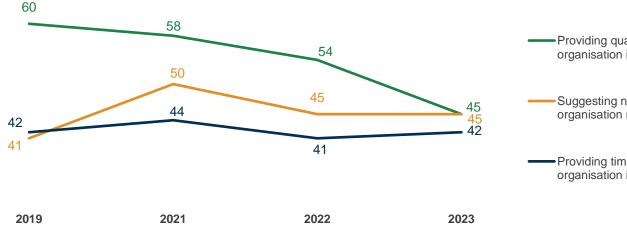
[^] Those who made an application.

Monitoring quality



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

(Among those who provided a rating)



 Providing quality feedback on whether your organisation is meeting expected standards

 Suggesting networks and resources that your organisation might use to improve performance ^

Providing timely feedback on whether your organisation is meeting expected standards

Q10. How would you rate TEQSA's performance over the last 12 months for...

Base: Respondents who provided a rating – 2023 (n=65-80); 2022 (n=58-83); 2021 (n=91-92); 2019 (n=111-126).

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

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



Applications

Section highlights: Applications



A need to monitor clarity and usefulness of application information

With respect to both TEQSA and CRICOS applications, perceptions of 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 trending incrementally downwards over time. 'Excellent' and 'good' ratings on each metric, for both TEQSA and CRICOS applications, are now at a low point.

Encouraging results on usefulness of CRICOS application feedback

With respect to the CRICOS application process, perceived usefulness of feedback from TEQSA about applications is a metric that has been consistently improving over time (62% rate TEQSA's performance here as either 'excellent' or 'good' in 2019 increasing to 82% in 2023). It is now TEQSA's third highest rated individual metric.

Improvements
observed relating to
timeliness of
feedback from
TEQSA

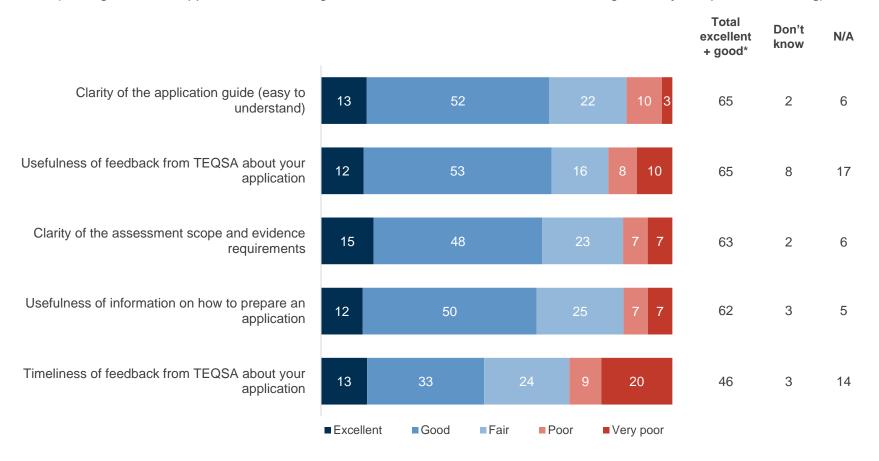
With respect to both TEQSA and CRICOS applications, perceptions of timeliness of feedback from TEQSA about applications have improved in the last year by at least 10 percentage points. The proportion of 'poor' or 'very poor' ratings on timeliness of feedback from TEQSA on both application processes has also decreased in the last 12 months.

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



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

(Among those that applied for TEQSA registration, accreditation and/or self-accrediting authority and provided a rating)

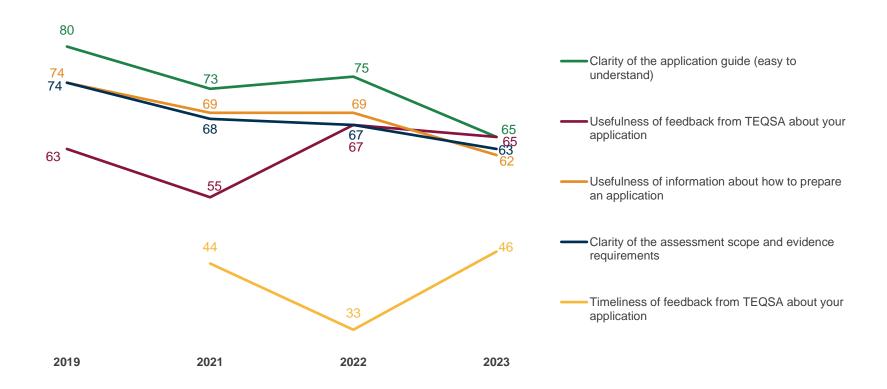


TEQSA application process



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

(Among those that applied for TEQSA registration, accreditation and/or self-accrediting authority and 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: Those who applied for TEQSA registration, accreditation and/or self-accrediting authority – 2023 (n=49-60); 2022 (n=45-51); 2021 (n=60-66); 2019 (n=68-84).

Timeliness of response to applications still an issue but clarity of requirements is also mentioned this year



Commentary provided this year on TEQSA's application process centres around two themes:

- Clarity and usefulness of information provided about making an application
- · Timeliness of TEQSA's response to applications

With respect to application guidelines, some providers have described these as out of date. Others appear to have had trouble accessing application guidelines.

There are also some mentions of Confirmed Evidence Tables and their perceived misalignment with guidelines.

The above issues may be contributing to the downward trend in ratings for metrics relating to the clarity and usefulness of application information.

Timeliness of feedback from TEQSA on TEQSA applications has typically been poorly rated. While there has been some improvement in ratings of TEQSA's timeliness of feedback about applications, the proportion of providers who deem TEQSA's performance in this area as 'excellent' or 'good' remains under 50%.

A lack of timely response to applications continues to frustrate providers. Questions are also raised about the accuracy of information included in submissions that could potentially be outdated by the time TEQSA reviews the application.

"We are still awaiting clarity on application requirements as the application guide is no longer on the website and we have not received our assessment scope or Confirmed Evidence Tables even though our application is due in the coming months."

"The application guide was very out of date (e.g. suggesting a case manager would be available to provide advice) and the instructions for using the system weren't completely correct (e.g. about replacing items). The lack of transparency regarding the Confirmed Evidence Table was also frustrating."

"Simplicity of the TEQSA Portal does not match complexity of what is required to be submitted as per the Confirmed Evidence Table document. This may lead to a poor application being submitted via the Portal due to limited instructional detail on the upload screens."

"The evidence table we received was very sparse and did not align with the guidelines. So we met with our case manager and a member of the assessment team to request clarity about what is required. We were clearly advised to only supply the information in the evidence table. This was very, very poor advice as the assessment team took the view we had not undertaken the tasks in the guidelines because the documentation was not requested in the evidence table, but the work had been undertaken."

"The portal information states download application guidelines and when you click on it, you are sent to the website for some brief information which then tells you to go to the portal, therefore unable to comment on usefulness of the information. There does not appear to be any guidelines to download."

Total

Just over a third rate the timeliness of TEQSA's feedback on CRICOS applications as 'excellent'



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

(Among those that applied for CRICOS and provided a rating)

| | | | | excellent + good* | Don't know | N/A |
|---|---------------|-----------|----------------|----------------------|---------------|-----|
| Usefulness of feedback from TEQSA about your application | 29 | 53 | 13 33 | 82 | 9 | 22 |
| Clarity of the assessment scope and evidence requirements | 20 | 48 | 24 2 7 | 67 | 2 | 15 |
| Clarity of the application guide (easy to understand) | 17 | 50 | 21 4 8 | 67 | 4 | 9 |
| Timeliness of feedback from TEQSA about your application | 35 | 30 | 20 7 9 | 65 | 5 | 11 |
| Usefulness of information about how to prepare an application | 14 | 51 | 29 6 | 65 | 2 | 9 |
| Helpfulness of information on how to use the provider portal (for preparing and submitting applications online) | 16 | 47 | 33 4 | 62 | 4 | 15 |
| | ■ Excellent ■ | Good Fair | Poor Very poor | | | |

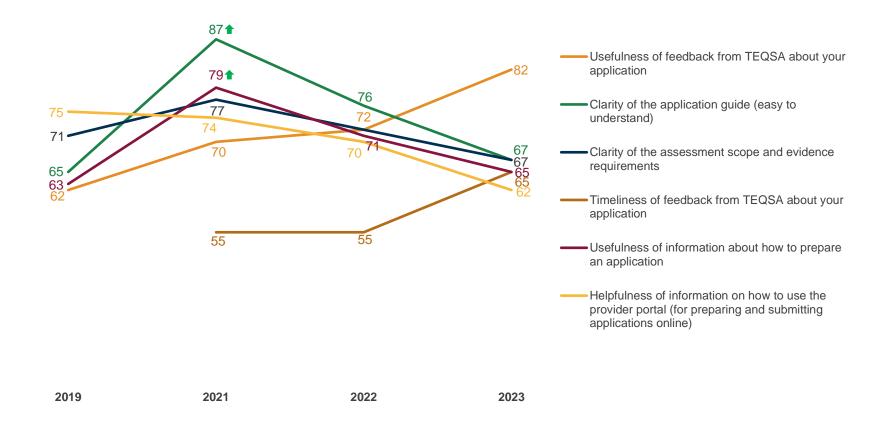
Q13b. How would you rate TEQSA's performance over the last 12 months on the following aspects of the CRICOS application process? Base: Those who indicated they applied for CRICOS (n=55).

CRICOS application process



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

(Among those that applied for CRICOS and provided a rating)



Remaining timeliness issues and appetite for more clarity and consistency of materials main reasons for poor ratings



There has been an improvement in perceptions of TEQSA's timeliness of feedback on CRICOS applications. Just under two-thirds of providers consider TEQSA's performance on this metric as either 'excellent' or 'good' – including 35% who consider it to be 'excellent'.

That said, those who provide a 'poor' rating on TEQSA's performance on any one of the CRICOS application process metrics evaluated continue to point to timeliness as the reason why.

Others mention a need for more consultation on application guides, guidance in the form of samples or a lack of clarity and consistency in the application information provided online. "We contacted TEQSA MANY times to seek our application scope and we didn't receive a response for months. Other organisations who were lodging in the same calendar year received notice months in advance of us. Not fair and not sure why the standard evidence requirements are shrouded in mystery – these should be available on the website."

"These ratings relate to CRICOS applications for individual courses and not being advised that we need to pay each time we submitted an application. Our application sat with TEQSA for approximately six weeks. We only found out the issue was non-payment of the required fee when we followed up."

"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/guidance provided on evidence requirements."

"There are gaps on the website and people haven't been able to answer my questions."

"CET [Confirmed Evidence Table] on the website for CRICOS renewal is not the same as CET provided by TEQSA staff."



TEQSA's case management

Section highlights: TEQSA's case management



Increasing stability in case manager contacts

Most providers (61%) have not experienced any changes to their case manager over the past 12 months – demonstrating some stability. For the four in 10 providers (39%) who have experienced a change to their case manager, a great deal of frustration is expressed at the implications that result from these changes.

Phone calls and meetings remain the top rated aspects, but views are declining

Almost three quarters of providers consider the usefulness of meetings and/or phone calls with their case manager either 'excellent' or 'good' (73%) – a proportion which has been decreasing incrementally the past few years. 'Excellent' and 'good' ratings of the usefulness of the annual 'health check' phone call have deteriorated more sharply over the past 12 months – with some claiming they never received one.

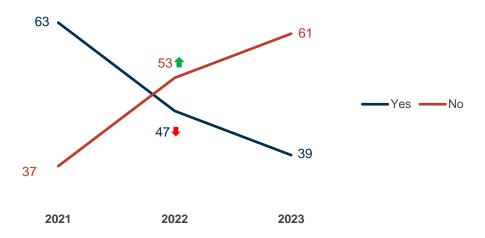
Recovered ratings in other areas

Following a dip in 2022, the proportion of providers who rate TEQSA's responsiveness to their organisation's needs and tailoring an application to meet their needs as either 'excellent' or 'good' has rebounded. Ratings for TEQSA's responsiveness went up nine percentage points in the last 12 months (to 69%) and ratings for their ability to tailor an application went up 11 percentage points (to 59%).

Changes to case managers are becoming less frequent but four in ten providers still experienced this in the last year



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

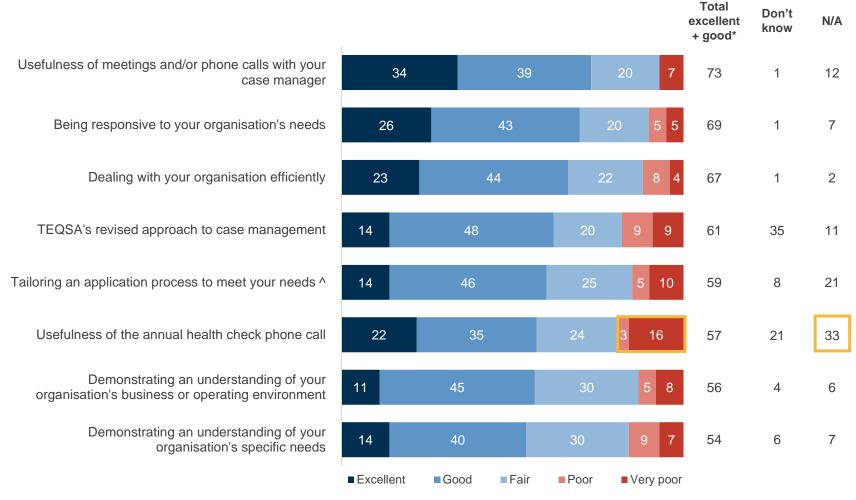


Interactions with case managers are well-regarded but the annual health check phone call experience varies



Performance of TEQSA's case management approach in the last 12 months (%)

(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=81-84).

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

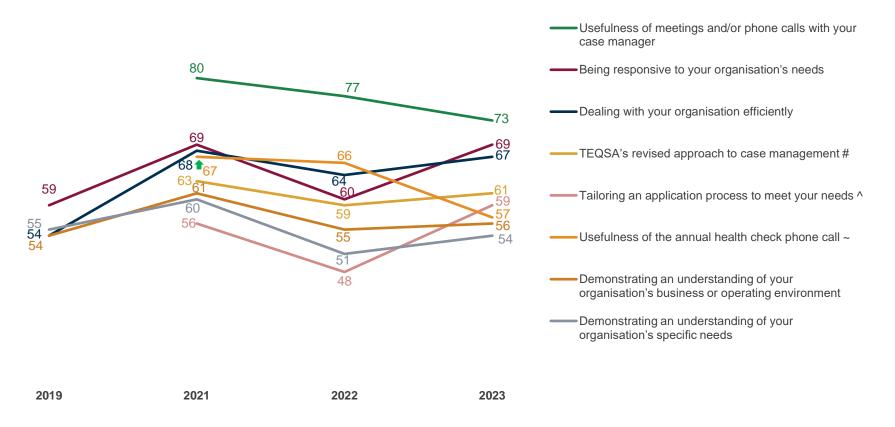
[^] Indicates that the item was only asked of those who submitted an application.

Case management



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

(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: Respondents who interacted with a TEQSA case manager – 2023 (n=37-78); 2022 (n=67-92); 2021 (n=66-112); 2019 (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 submitted an application.

[~] Indicates the wording of this item has changed slightly since 2021. # Indicates the wording of this item has changed slightly since 2022. Significantly higher ↑ than the previous years result at the 95% confidence interval.

Some providers do not know if they have an assigned case manager



Poor case management ratings are often linked to:

- · an inability to get in contact with case manager
- · a lack of notification when case managers change
- perceived lack of higher education and regulatory knowledge among some case managers
- perceived lack of understanding and knowledge of an individual provider's circumstance.

Providers want to be assured of their case managers level of experience to feel more confident in their ability to meet provider needs.

Some suspect issues with case managers are a symptom of them being overworked.

There are examples provided of institutions who have not heard from their case manager in a year or have no knowledge if they have a case manager assigned. When case managers are unresponsive, providers make assumptions that their case manager may have left, and they are yet to be notified.

There are also several mentions of providers having not received an annual 'health check' phone call and also being unaware of a 'revised' approach to case management. "With the departure of our case manager, there has been no replacement and we've had no advice on re-registration requirements; now three months overdue. We have to initiate contact with TEQSA to get any advice ... the case manager approach employed by TEQSA is seen as beneficial however cannot be utilised if there is no case manager assigned."

"I'm not sure whether my case manager understands my particular environment. Perhaps this could be made more explicit and we can be given more information about the case manager's experience."

"There remains inconsistency in interpretation of HESF [Higher Education Standards Framework] by various case managers – further training is required."

"Regularly unable to gain contact with our case manager.

Annual health check has not occurred for three years running."

"Case manager is disengaged and not able to respond to queries and has little knowledge of our circumstances."

"We have been unable to make contact with the current case manager, there are no responses to emails. We are uncertain whether this is still the same case manager at this point."

"They really don't get the nature of a multi sector multi entity

ASX listed education organisation."

"I don't believe we've heard from our case manager in over 12 months. We haven't had our annual health check phone call."



Changes in the last 12 months

Section highlights: Changes in the last 12 months

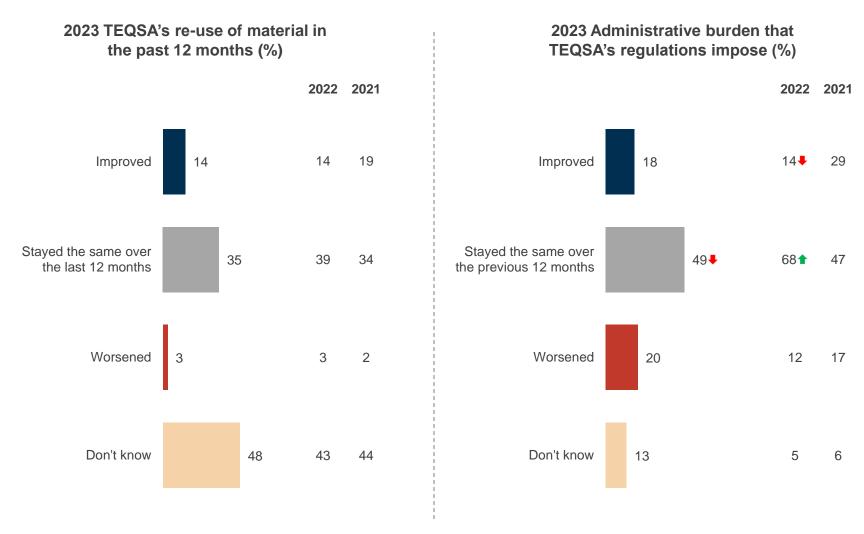


A need to promote how TEQSA re-uses material Almost half of providers say they 'don't know' what they have noticed about TEQSA's re-use of material that their organisation has provided in the last 12 months. This is slightly higher than previous years. It is possible that TEQSA could be better recognised for it's efforts to re-use material that has been provided to them if providers were more aware of what it does in this space.

The administrative burden appears to have worsened for some providers The proportion of providers who say the administrative burden that TEQSA's regulations impose on their organisation has 'stayed the same' over the past 12 months has significantly declined (down from 68% to 49% this year). Of the remainder, more providers feel the administrative burden has worsened (20%) rather than improved (18%).

Significantly fewer providers believe the administrative burden has stayed the same in the last year than in 2022





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?



Sector risks

Section highlights: Sector risks



Cyber security remains the top risk to the sector

Almost eight in ten providers (78%) consider cyber security a high threat to the sector. The threat level posed to the sector by cyber security is at an all time high since tracking of this metric commenced in 2019.

A reduction in the threat level of regulatory barriers to innovation and student safety and wellbeing

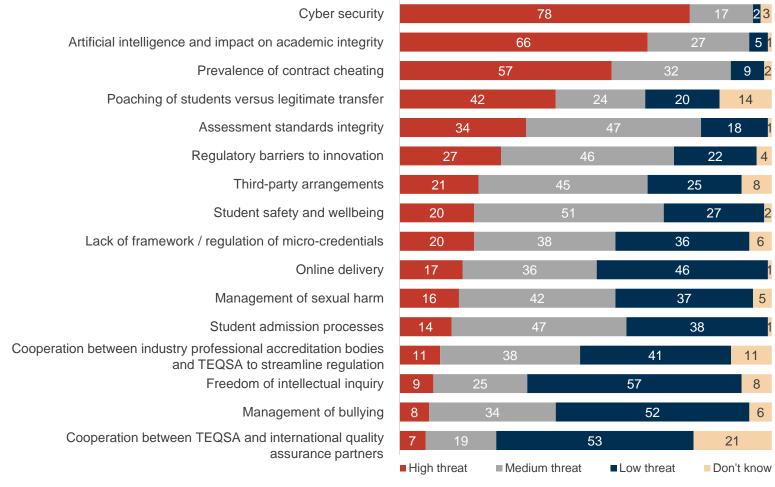
The proportion of providers who consider regulatory barriers to innovation a high threat to the sector has significantly declined since 2022 (27% in 2023 – down from 44% in 2022). Similarly, the proportion of providers who consider student safety and wellbeing (worded student mental and physical wellbeing in 2022) a high threat to the sector has significantly reduced from 39% in 2022 to 20% this year.

Al a prevalent threat but TEQSA's work here acknowledged Rated for the first time in 2023, Al and its impact of academic integrity is perceived as the second greatest threat to the sector behind cyber security. Two thirds of providers (66%) consider Al a 'high' threat. TEQSA receives praise for their proactivity in addressing this new and emerging concern. Providers are happy with the work being done in this area so far and hope it will continue.

Cyber security remains greatest perceived threat to the sector followed by AI and contract cheating



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?

Concerns and threats to the sector extend beyond those quantitatively evaluated



The risk to the sector presented by AI is mentioned by many providers – reinforced by the 66% who consider AI to be a 'high threat' to the sector (evaluated for the first time this year). That said, TEQSA is considered to be proactive in understanding and addressing the issue.

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

- government funding for higher education
 - Some feel that universities are better funded than institutes for higher education.
- Australia's current financial landscape, e.g. cost of living, budget cuts in education, 'economic downturn'
- rising repayments for students and student debt
- declining enrolments
 - This is thought to be a result of rising tuition costs and competition from other providers offering discounted tuition.
- the perceived mismatch between job skills required and what the higher education system is delivering
- the perceived lack of international student monitoring and management
- providers' ability to meeting student needs.
 - Some describe students as disengaged after COVID, arguing they want more online learning and tailored education.

"TEQSA has focussed on the threat presented by AI in the past 12 months. The guidance and workshops provided to the sector has been valuable and a continued focus on this risk is important."

"Education agent regulation (for international students) is essential. Agents drive student mobility both on and off shore and this is controlling the sector. Students are getting moved around purely so agents can make more money. TEQSA should also look at why PSWR [post-study work rights] and PR [permenant residency] pathways are linked to courses. These factors drive student mobility even if students have no interest in these courses. If PSWR and PR pathways were open to all graduates who get jobs regardless of their course of study, we would see a far better distribution of international students across a multitude of disciplines rather than these targeted channels funneling the masses."

"Higher education has always struggled to respond in a timely and considered fashion to changes in the needs of employers and indications are that the rate of change we will see in coming years will outstrip anything before. It is likely that we are already teaching knowledge, and especially skills, that will not be needed in the workplace soon after current students graduate. There is already much discussion internationally on the value of a degree and whether or not the investment in time and money is a sensible choice for students."

"Face-to-face delivery mode is becoming less and less appealing to a generation who are conditioned to remote learning post-pandemic."

Sector risks



Sector risk threat levels (%)

| | High threat (%) | | | |
|---|-----------------|-------------|------|------|
| | 2019 | 2021 | 2022 | 2023 |
| Cyber security | 43 | 76 ↑ | 66 | 78 |
| Artificial intelligence and impact on academic integrity | N/A | N/A | N/A | 66 |
| Prevalence of contract cheating | 48 | 52 | 55 | 57 |
| Assessment standards integrity ~ | N/A | 26 | 29 | 34 |
| Poaching of students versus legitimate transfer | N/A | N/A | N/A | 42 |
| Regulatory barriers to innovation | 33 | 40 | 44 | 27₹ |
| Third-party arrangements | N/A | N/A | N/A | 21 |
| Student safety and wellbeing ~ | 27 | 43 ↑ | 39 | 20₹ |
| Lack of framework / regulation of micro-credentials | 5 | 231 | 19 | 20 |
| Online delivery | N/A | 28 | 15₹ | 17 |
| Management of sexual harm ~ | 22 | 17 | 19 | 16 |
| Student admission processes | N/A | 11 | 9 | 14 |
| Cooperation between industry professional accreditation bodies and TEQSA to streamline regulation | 17 | 10 | 10 | 11 |
| Freedom of intellectual inquiry | 15 | 14 | 18 | 9 |
| Management of bullying | 17 | 13 | 6 | 8 |
| Cooperation between TEQSA and international quality assurance partners | N/A | 3 | 4 | 7 |



Perceived strengths and weaknesses

Section highlights: Perceived strengths and weaknesses



TEQSA's work on
Al and general
guidance information
it provides highly
valued

When asked what TEQSA does well, many providers point to TEQSA's approach to understanding and informing the sector about what AI means for them, along with their continued work on academic integrity and contract cheating. The case management approach (when enacted) is also praised as being an effective model of contact and communication.

Providers would appreciate more sector-wide collaboration and in-person contact

Timeliness in responses to and feedback on applications remain a key area for improvement. Aside from timeliness, providers express their desire for more inperson engagement with TEQSA and other providers. Providers say they would benefit from meeting others like them and sharing knowledge. There is a view TEQSA could improve quality control with more in-person visits to institutions.

Some frustration linked to TEQSA's use of external experts

When asked what TEQSA should stop doing, some commentary is provided on TEQSA's perceived reliance on external experts to assess organisations. There is a belief TEQSA staff should do this themselves. Others express frustration at TEQSA's RFIs. Some believe that much of the information provided through these requests is often not used and therefore wastes the time of providers.

Perceived strengths and weaknesses of TEQSA



Strengths - what TEQSA does well

- TEQSA's approach to addressing AI and how it relates to the sector.
- Written guidance provided including good practice and guidance notes.
- Addressing threats to academic integrity and the Integrity Unit more broadly.
- The case manager approach (when it works and providers have helpful contacts).
- The annual TEQSA conference.

Weaknesses – where TEQSA could improve

- · Consistency in decision making.
- Timeliness in response to providers including decision making.
- Communication with providers regarding application status
 progress updates would be appreciated.
- Maintaining a stable workforce with less staff turnover.
- Being more connected to providers through increased outreach efforts.
- More consideration of smaller institutes of higher education and how their needs differ from large institutes.

Opportunities – what TEQSA should do more

- International benchmarking.
- Provision of more professional training opportunities for providers.
- Site visits to institutions to better understand operations and higher education quality control by seeing what happens in person.
- Provision of more opportunities for providers to get together in round tables or in forums like focus groups to share knowledge and information and network.

Threats - what should TEQSA stop doing

- Reliance on external experts.
- Asking for what is perceived as unnecessary information that TEQSA does not end up doing anything with (e.g. RFIs).
- Holding the conference in Melbourne each year.

Select verbatim responses: Strengths and opportunities



What TEQSA does well?

"The case management approach is still the most effective liaison mechanism and should continue. Keep improving the good practice notes – they are very helpful."

"Good practice guides and compliance guidelines are good. Case manager model is good if there is an assigned case manager. Proactive approach to artificial intelligence and academic integrity."

"Case management approach where providers have a point of contact and a person who understands their organisation and needs. Annual conference – very informative and always a good range of speakers covering current topics of interest."

"The TEQSA Integrity Unit are to be commended. Please ensure ongoing funding for them."

"The work you do on contract cheating. It's precisely what the sector needs from the regulator."

"Continue to support and lead dialogue on artificial intelligence / academic integrity."

"TEQSA's approach to developing sector guidance through published notes, resources and webinars in the context of generative AI, academic integrity and contract cheating is to be commended."

What should TEQSA be more involved in?

"Benchmarking with regulators of other countries."

"International benchmarking and university monitoring."

"TEQSA can provide more professional development opportunities — either free or at minimal cost — particularly for non-university providers who are self-funding. Areas for professional development include micro-credentials, seeking self-accreditation, research and publications, benchmarking, etc. ... to benefit and build capacity and capability amongst the smaller providers."

"Meeting with private sector providers be it individually or as groups to test the temperature of the sector."

"Directly engage more private providers and professional bodies in sector round tables."

"More focus groups and smaller networking sessions around quality assurance topics. TEQSA is best placed to facilitate these networking and information-sharing sessions. There's a lot we can learn from each other."

"A face-to-face / site-visit approach to higher education quality control. If we are to be serious about promoting quality, we can't do it on desk audits."

"Site visits ... staffing and facilities would openly display/ demonstrate what largely goes unnoticed which is to the detriment of genuine providers."

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



Where could TEQSA improve?

"I have noticed there has been a number of shifts in positions at TEQSA since COVID. We have been fortunate in maintaining the same case manger. Trying to maintain a stable workforce for a regulator should be a priority – these people are highly specialised and difficult to replace."

"Communication when applications are under assessment, i.e. where are assessments up to, when to expect a decision, etc."

"Take the time to get to know the higher education providers and understand what is really taking place in the organisation, and install a true approach of Trust, Respect, Accountability and Consultation."

"Consistency in reviewers and in decisions."

"Timeliness of assessing applications and communicating processing times to providers."

"Improve application response times. Visit providers in person more regularly. Include independent providers in activities and decision making, rather than always focusing on the university sector e.g. the TEQSA conference."

"Too slow making decisions. Too much inconsistency between decisions."

What should TEQSA stop doing?

"TEQSA should form its own views of a provider and make decisions without input for external experts. If a provider has a good track record of course applications, then decisions should be made quickly and internally."

"Using experts to do their job of assessing an organisation. Please have qualified staff that not only understand the requirements of HESF, HESA [Higher Education Support Act], provider categories, CRICOS – but know how to apply them. Hire academics if you must who have actually worked in the higher education sector!"

"Conference is a bit too academic, university and Melbourne centric (offering virtual attendance doesn't count). Broaden the content, TEQSA has remit of ESOS, ELICOS, CRICOS for higher education providers."

"Reliance on biased external expert processes."

"Unnecessary RFIs which could be avoided by checking documents which have previously been provided."

"Only running the TEQSA conference in Melbourne."

"Asking providers for reports they don't really do anything with."

"Where possible reduce the impost of unnecessary burden through RFIs."

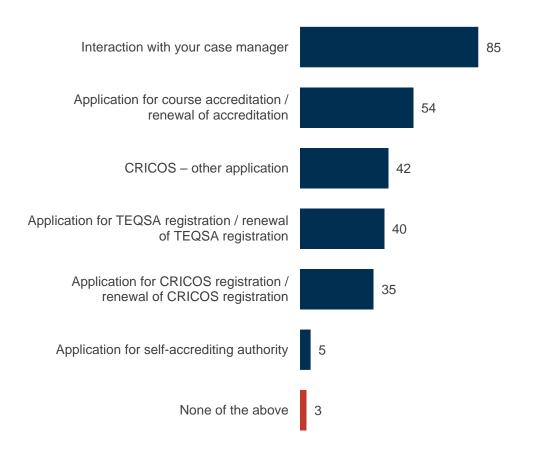


Majority of providers engage with TEQSA through their case manager and course accreditations



Interactions with TEQSA in the last 12 months (%)

(Multiple response allowed)



THERE ARE
OVER 190
TEQSA
REGULATED
PROVIDERS
IN AUSTRALIA...

FIND OUT WHAT THEY'RE THINKING.



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