



TEQSA Stakeholder Survey 2021 Research report

Prepared for the Tertiary Education
Quality Standards Agency (TEQSA)

September 2021



Contents

<u>Background, objectives and methodology</u>	<u>3</u>
<u>Executive summary</u>	<u>6</u>
<u>Detailed findings</u>	<u>11</u>
<u>KPIs and overall performance</u>	<u>12</u>
<u>Overview</u>	<u>20</u>
<u>Communication</u>	<u>26</u>
<u>Consultation</u>	<u>29</u>
<u>Regulatory processes and activities</u>	<u>34</u>
<u>Monitoring quality</u>	<u>41</u>
<u>Applications</u>	<u>44</u>
<u>TEQSA's case management</u>	<u>49</u>
<u>Changes in the last 12 months</u>	<u>54</u>
<u>Sector risks</u>	<u>57</u>
<u>Perceived strengths and weaknesses</u>	<u>61</u>
<u>Appendices</u>	<u>66</u>
<u>Appendix A: Interactions with TEQSA</u>	<u>67</u>
<u>Appendix B: Comparison to 2019 results</u>	<u>69</u>

The letters 'JWS' are rendered in a large, bold, sans-serif font. The interior of the letters is filled with a dark blue, space-themed pattern of glowing white and light blue lines and dots, resembling a network or a star map. The background of the slide is white.

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 with the COVID-19 pandemic last year, the 2020 stakeholder consultations were conducted via focus groups with institution peak bodies only.

For 2021, TEQSA is looking to gain insights into providers' views on the agency's performance, in addition to potential and/or emerging sector-wide risks.

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

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

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

Results will also be used to inform TEQSA's 2021 annual report.



Research methodology



TEQSA stakeholder survey

Unique contact details for n=308 contacts of TEQSA-regulated providers were provided by TEQSA.

JWS Research emailed a link to the survey to the n=308 stakeholders for whom an email address was supplied, providing for an attempted census. Valid email addresses were available for n=298 of these stakeholders.

n=126 stakeholders, including representation from universities, higher education providers and non higher education providers, provided complete responses to the survey, providing a response rate of 42%.

The 126 stakeholders represented a total of 109 providers, meaning the survey captured the views of 59% of TEQSA regulated providers.

- Two reminder emails were sent to maximise participation in the survey.
- The maximum margin of error on the total sample of n=126 is +/-6.6% 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.
- Peak, professional, student bodies were not surveyed in 2021.
- Analysis by provider category is based on the former Provider Category Standards classifications and comprised n=44 universities, n=78 higher education providers and n=4 non-higher education providers. The new provider categories were introduced on July 1, 2021.

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

Conducted 31st May to 18th June, 2021.

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

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



Executive summary



Executive summary

TEQSA's overall performance is highly rated



Three quarters (76%) of providers rate TEQSA's overall performance as either 'excellent' or 'good'. Views are unchanged from 2019.

Providers, including Vice Chancellors and CEOs, are appreciative of TEQSA's conduct over the past year in a challenging COVID-19 context.

Performance on most individual KPIs have declined

Despite a steady overall performance result, perceptions of most individual KPIs have declined since last evaluated in 2019.

The exception to this is views on TEQSA's communication performance:



70% rate TEQSA's performance on: 'communication with your organisation is clear, targeted and effective' as 'excellent' or 'good' – five percentage points higher than in 2019. This reverses a pattern of declining perceptions from a peak top two box rating of 81% back in 2016.

For the first time, there are two KPIs in which less than half of providers rate performance as 'excellent' or 'good':

- Compliance and monitoring approaches (48% 'excellent' or 'good').
- Regulation by TEQSA does not unnecessarily impede the efficient operation of higher education providers (45%).

When TEQSA's impact is reframed as a role that 'upholds quality standards with a proportionate approach to managing risks and supporting the sector to comply and improve', providers rate TEQSA more favourably (70% 'excellent' or 'good').

Communication and information provision is where TEQSA performs best

On all communication measures evaluated, at least two-thirds of providers rate TEQSA's performance as either 'excellent' or 'good'. On most measures, one in five (or more) providers rate TEQSA's performance as 'excellent'. TEQSA is most well-regarded in :



- Guidance and good practice notes; and
- Advice and resources relating to COVID-19.



Executive summary (cont'd)

Timeliness aspects are TEQSA's lowest rated areas



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

- 'Minimising the time taken between submitting an application and first receiving a regulatory decision' (40% believe TEQSA's performance here is either 'excellent' or 'good').
- 'Giving timely feedback to save your organisation using its resources on applications that are unlikely to be successful' (43%).
- 'Providing timely feedback on whether your organisation is meeting expected standards' (44%)
- 'Timeliness of feedback from TEQSA about your application' (44%).

Consultation and feedback opportunities are appreciated and well-regarded

One in five providers rate TEQSA's performance as 'excellent' on:

- 'Providing your organisation with the opportunity to give feedback on the annual risk assessment process' (22%) – however, there is feedback that the 2020 Risk Assessment process was problematic.

- 'Providing your organisation with the opportunity to give feedback on application processes' (21%).

The only consultation measure where less than a majority of providers rate TEQSA's performance as either 'excellent' or 'good' is 'listening to your organisation views on ways to reduce regulatory administrative burden' (42%).

Regulatory processes and activities

TEQSA's conduct in relation to its regulatory activities is a strong point.



- 57% of providers rate TEQSA's performance on treating them with politeness and respect as 'excellent'.

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

Monitoring quality



- The quality of feedback that TEQSA provides is better regarded than its timeliness.

Some providers may be unaware of the resources available to improve performance, with relatively high 'don't know' and 'not applicable' responses.



Executive summary (cont'd)

Clarity and usefulness are the top-rated aspects of both the TEQSA and CRICOS application process

Here too, timeliness is where TEQSA is less well-regarded.

Majority of providers have had a change to their case manager in the past 12 months



Providers feel they need to have longer-standing relationships with their case managers for them to understand the individual organisation's needs. Both of the following aspects are among TEQSA's lowest rated case management items:

- 'Demonstrating an understanding of your organisation's business or operating environment' (60% either 'excellent' or 'good' performance).
- 'Demonstrating an understanding of your organisation's specific needs' (61%).

Proactive communication with providers from their case managers is an important element of the relationship and is very much valued.

- 80% rate the usefulness of meetings and/or phone calls with case managers as either 'excellent' or 'good'.

Prolonged international border closures perceived to pose the greatest risk to providers



85% of providers consider international border closures to be a 'high threat' to the sector.

Providers are concerned about how Australia will maintain its attractiveness as a destination for international students and encourage TEQSA to advocate on their behalf regarding the re-opening of borders for international students.

The recently announced cost recovery measure is a concern for smaller, private providers who feel they will be unfairly disadvantaged.



Considerations and opportunities

Attempt to reduce extended response timeframes

One of the greatest opportunities for TEQSA appears to lie in a review of timeframes. There are two issues on this front. The first is that providers perceive they are not given adequate time to compile a response to an application query. There is a view that TEQSA then takes an inordinate amount of time to review the application.

Continue to acknowledge the COVID-19 context

Overall performance perceptions, in conjunction with Vice Chancellor and CEO comments, centre around an appreciation of TEQSA's navigation of COVID-19. Continued efforts will be required here, with providers hopeful that TEQSA can assist with the greatest threat to the sector – international border closures.

Mixed experiences with case management approach

Some providers speak highly of their experiences with their case managers. For others, frequent changes in personnel are perceived to result in the loss of valued relationships with TEQSA staff. Providers want to feel that their case managers have an understanding of their individual business needs – this takes time to build.

Improve equality between provider types

Some providers feel unfairly disadvantaged by regulation. Smaller, private providers feel the cost recovery approach will threaten their viability. Others feel that application of the same regulations and expectations to both private providers and universities signals a lack of understanding of the differences between the two.

Risk assessment process may need revision

There appears to be some discontent with the 2020 risk assessment process. Timelines for feedback, financial information utilised and the decisions resulting from the process are all mentioned as being problematic.



Detailed findings



KPIs and overall performance



Section highlights: KPIs and overall performance

TEQSA's overall performance is highly rated

Three quarters of providers (76%) rate TEQSA's overall performance as either 'excellent' or 'good' – including 21% who rate it as 'excellent'. The overall performance rating remains unchanged from 2019. Views often relate to TEQSA's conduct throughout the COVID-19 pandemic, for which providers are appreciative. This sentiment is echoed by Vice Chancellors and CEOs.

In contrast, performance on individual KPIs have declined

While on most KPIs, a majority of providers rate TEQSA's performance as either 'excellent' or 'good', the proportion of those who do so is lower this year than it has been in previous years. For the first time, there are two KPIs in which less than half of providers rate performance as 'excellent' or 'good': Compliance and monitoring and impact (regulation does not unnecessarily impede efficient operations).

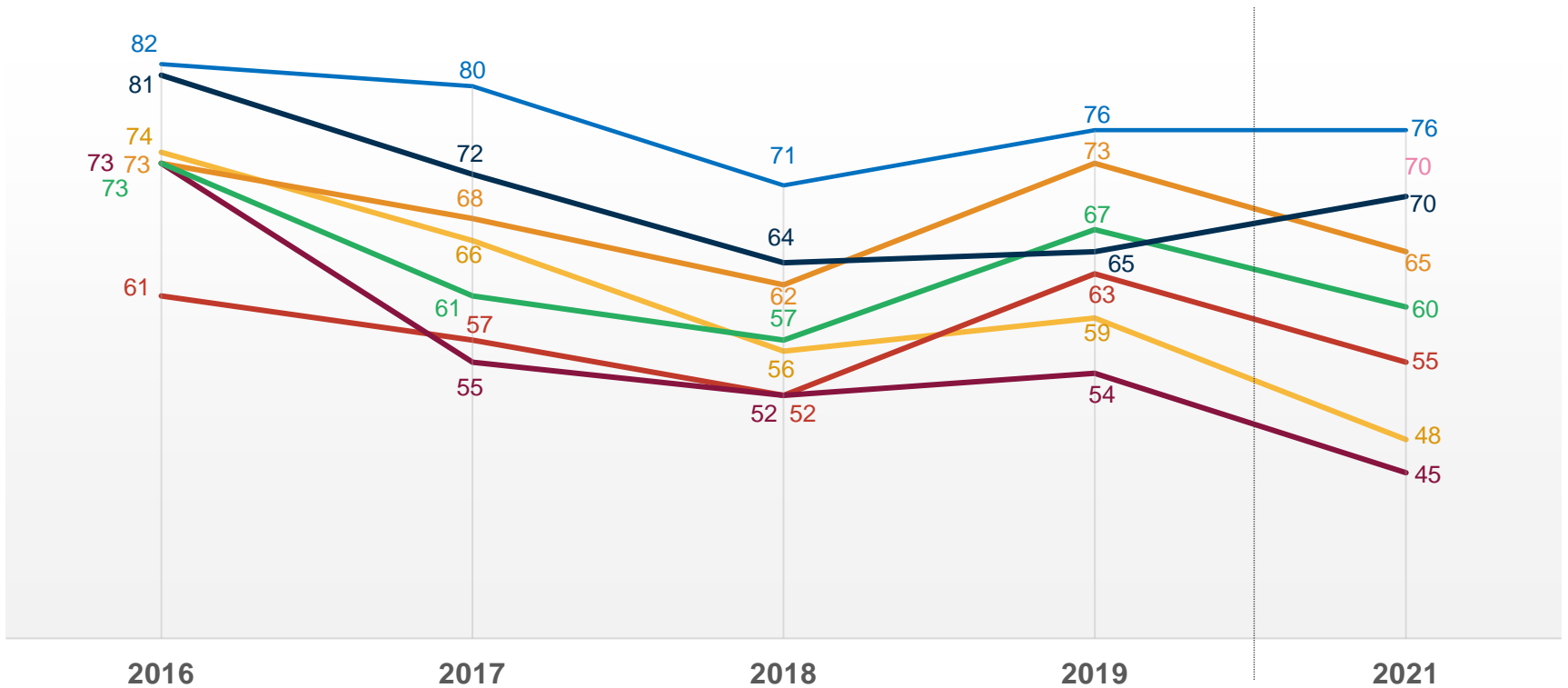
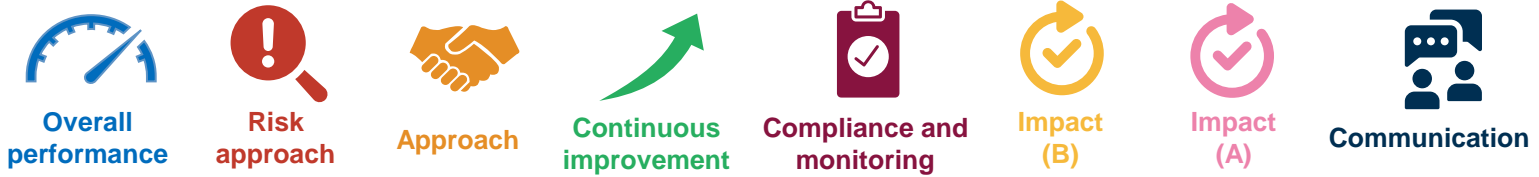
Communication and upholding quality standards is where TEQSA performs best

Seven in ten providers rate TEQSA's communication and upholding quality standards performance as either 'excellent' or 'good'. TEQSA's communication is the only KPI where perceptions have improved since the last evaluation in 2019. This is likely reflective of providers being impressed with TEQSA's responsiveness to the COVID-19 pandemic.



Summary of KPIs

Total excellent + good (%)*

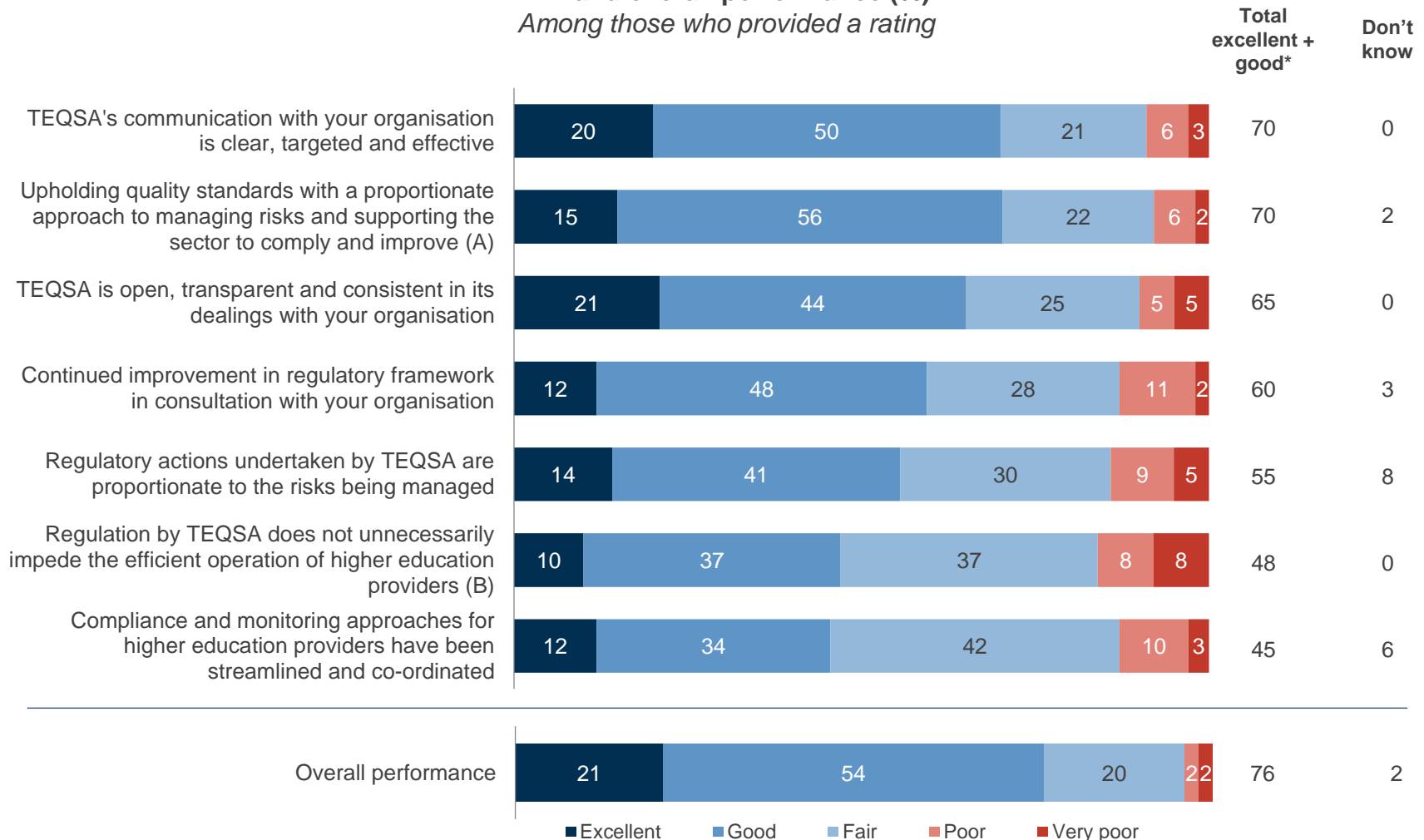


Don't know responses have been excluded from the 'Total excellent + good' calculation.
 Please note that in 2020, the annual TEQSA Stakeholder Survey was not conducted.
 Please note that 'Impact A' is a new KPI metric in 2021.



Perceptions of KPI and overall performance

KPI and overall performance (%)
Among those who provided a rating



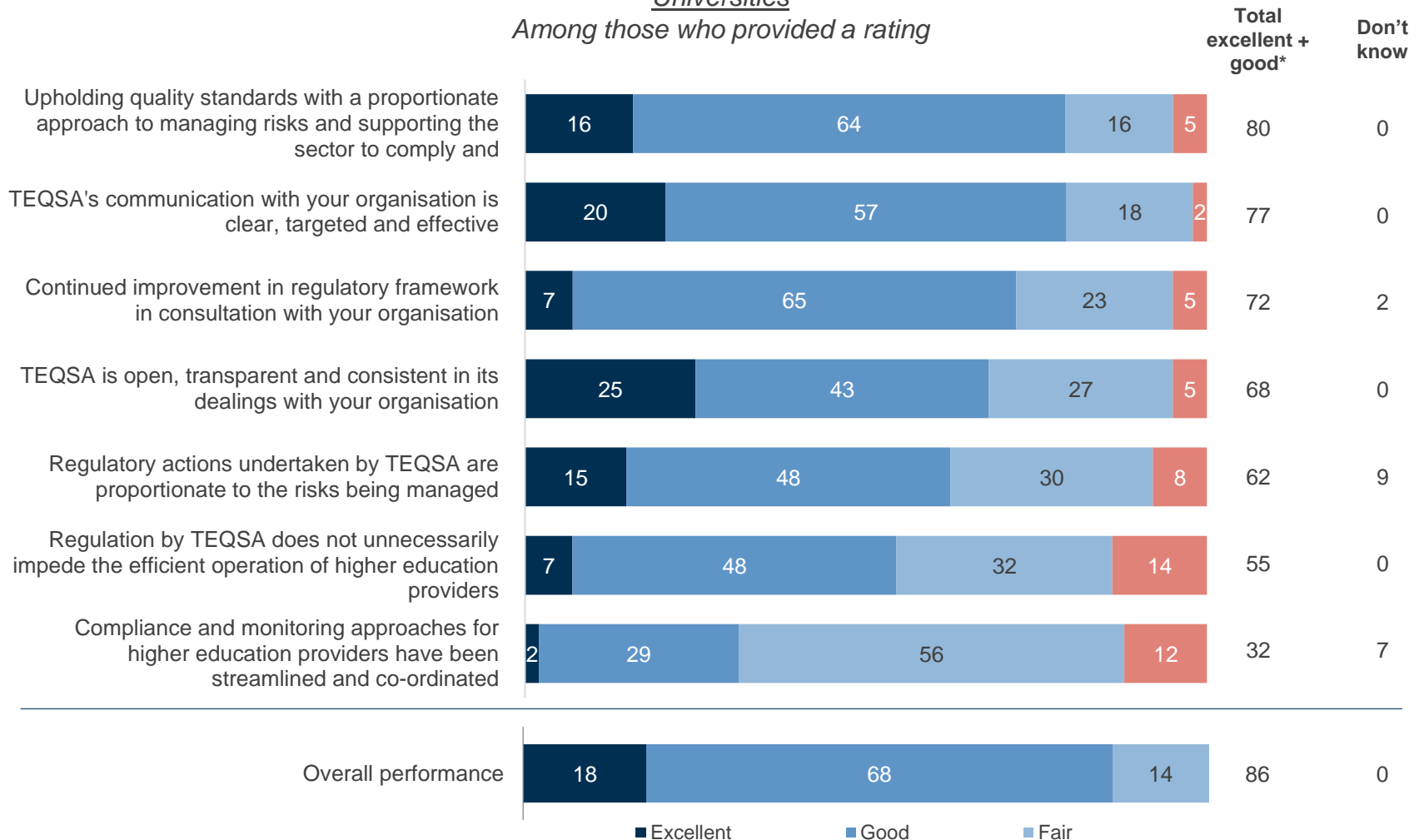
Q. Please rate TEQSA's performance over the last 12 months on each of the following indicators / Q. How would you rate TEQSA's performance over the last 12 months as the regulator assuring the quality of Australian higher education
Base: All respondents (n=126)

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

Perceptions of KPI and overall performance among universities



KPI and overall performance (%)
Universities
 Among those who provided a rating



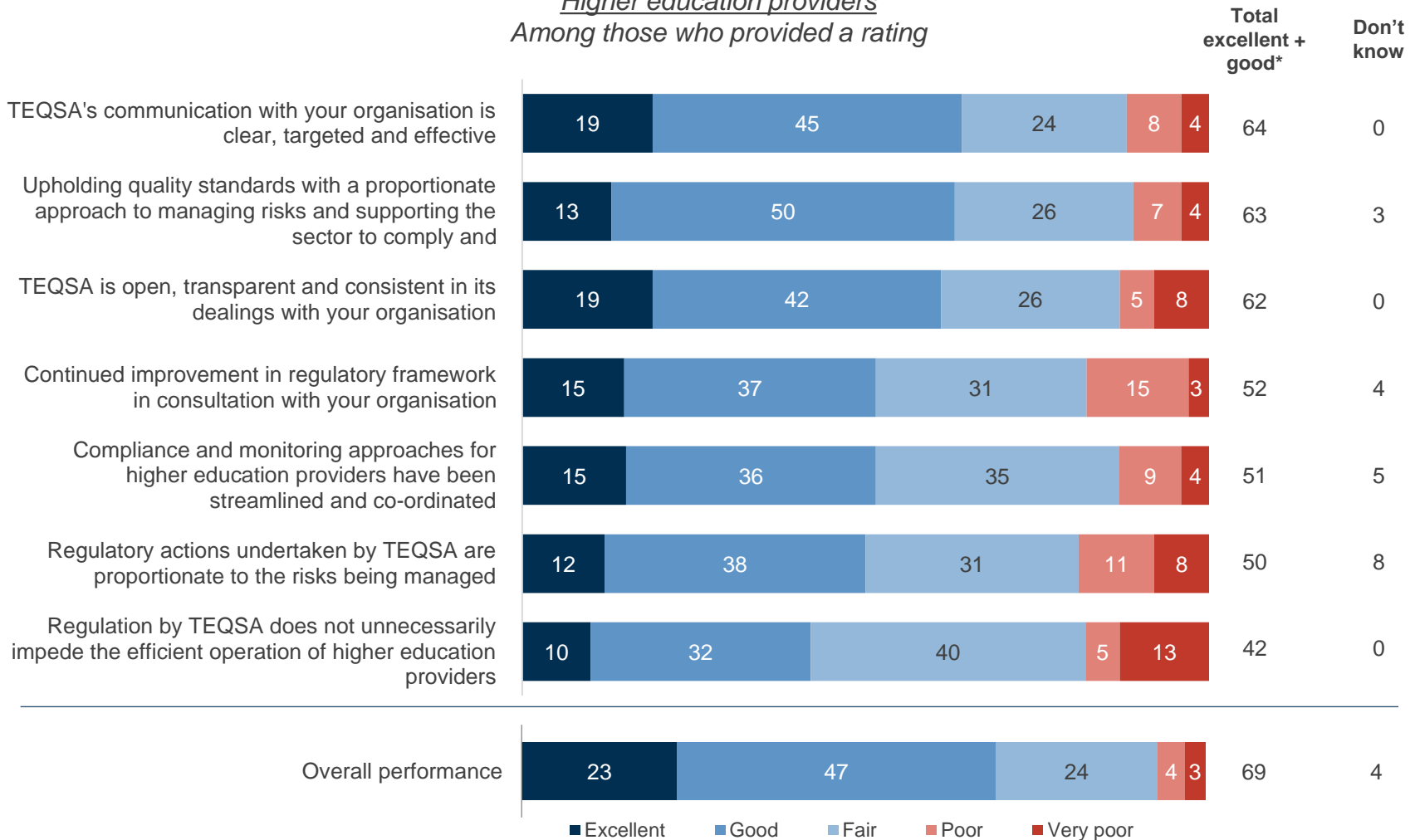
Q. Please rate TEQSA's performance over the last 12 months on each of the following indicators. Q. How would you rate TEQSA's performance over the last 12 months as the regulator assuring the quality of Australian higher education
 Base: Universities (n=44)

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

Perceptions of KPI and overall performance among higher education providers



KPI and overall performance (%)
Higher education providers
 Among those who provided a rating



Q. 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=78)

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

Providers appreciate TEQSA's support, though the Risk Assessment process appears to be problematic



When given the opportunity to provide feedback on TEQSA's KPI performance, many providers claim to be satisfied and impressed with TEQSA given the challenging COVID-19 environment.

It is likely that TEQSA's impressive COVID-19 response may attribute to TEQSA's overall performance rating being higher than it is for the individual KPI metrics. Many providers took the time to thank TEQSA for their support over the past 12 months and adaptability to a new and difficult landscape.

That said, there are a number of mentions of the 2020 Risk Assessment process being problematic and some perception that it was flawed due to the use of unaudited financial information.

Staff turnover at TEQSA is also mentioned as being a challenge, that is perceived to have an impact on slow-turnaround times for application responses and feedback.

"We acknowledge it has been a challenging 12 months, with many competing demands, and therefore we believe TEQSA have done well considering the changing landscape with government policy, legislation, provider category and short course accreditations."

"The new look 2020 Risk Assessment identified risks that are not proportionate to the actual risks. TEQSA invited providers to respond to the interim RA but then failed to consider the responses that explain the data and associated risks and accordingly assign a more suitable risk rating as it has done in the past. It was very clear that TEQSA did not even read the response very thoroughly, with the final RA failing to rectify existing errors identified by the provider and containing new errors. Not satisfactory."

"While appreciating unique COVID circumstance and the move to use more current data, TEQSA's Risk Assessment process was problematic in 2020 in using mid year unaudited financial information and not taking account of full year performance. Some institutional data remained inaccurate in the final report, despite feedback provided. Revised reporting format with benchmarking information included was appreciated."

"The challenge appears related to the rapid turnover of TEQSA staff for whatever reason and thinner staffing, exacerbated by post-COVID work practices."

"There are concerns that delays are back to the bad old days of very long and unpredictable."

"Have found TEQSA responses irregular and advice inconsistent. Appears to result from high staff turnover."

Select verbatim comments: Vice chancellor/ CEO's personal comments on TEQSA's performance



“TEQSA has worked hard on their service over the past couple of years. We still have significant concerns in regard to the turnaround times for submissions/ applications and these need to be addressed, especially with TEQSA's intent to implement cost recovery.”

“TEQSA appears to go through undulating degrees of control and compliance burden on universities over time. My assessment is that TEQSA has turned back a little from the more recent trend to have a gradually lighter touch approach and is veering slowly towards a heavier hand course again. This is concerning if it keeps going – universities are under intense pressure on all fronts. We don't need a heavier hand from TEQSA. We need less.”

“TEQSA has a high turn over of case managers which give the appearance that it also has a toxic work culture. The sector is over regulated and favours well established / larger providers.”

“We would like to thank TEQSA for its flexibility throughout 2020 and the smoothing initiative.”

“Notable efforts to humanise processes. Flexibility around COVID admirable. Cost recovery plans a significant threat to viability, but consultation has been good.”

“Whilst I fully support the work of TEQSA and the importance of good regulation, it has been a very frustrating experience over the past few years. I am very concerned that TEQSA staff are not suitably qualified to understand the application of the standards in the context of a provider (who all have their own differences). I am also concerned that the staff turnover at TEQSA is extremely disruptive. We have had many case managers over the years suggesting that the workplace at TEQSA is a high risk site. This is a concern when providers are being scrutinised by staff who are probably under a significant amount of stress due to the work environment. I appreciate that there are budget concerns with finding and keeping appropriately qualified and capable staff, but given the importance of the role TEQSA plays in regulating our sector, I would think this is a reasonable thing to expect. I was disappointed to see the lack of an appropriate response to our annual risk assessment but link that also back to a staffing capability issue. I appreciate the flexibility TEQSA have extended to us all throughout this COVID-19 environment and the resources that they have provided. This past 18 months has been, and continues to be, incredibly difficult. Thank you for the opportunity to provide feedback.”

“Interaction with TEQSA has been good, approachable and open to assisting us. However we feel there is a fundamental conflict of interest and over reliance on external expert opinions. Often these people are from direct competitors and have a very narrow view of a topic or area, which affects their review of the overall application for accreditation. This therefore negatively affects TEQSA's risk rating of the institution as a whole.”

“We have lost a lot of talent and experience in the team at TEQSA which creates a new challenge in understanding of the strategy of our group.”

“I think TEQSA did extremely well in helping the sector during the worst of the COVID impacts. TEQSA was appreciative and understanding of the difficulties the sector faced.”



Overview



Section highlights: Overview

Communication and information provision is where TEQSA performs best

Comparisons across all of TEQSA's individual metrics evaluated show that communication and provision of information is where TEQSA is most positively rated. Information provided by TEQSA appears to be useful, helpful and clear. The conduct in which TEQSA communicates with providers is also a strong point.

Measures relating to timeliness are TEQSA's lowest rated areas

Timeliness issues relating to all different areas of TEQSA's remit are of concern. These are the only metrics evaluated where less than a majority of providers rate TEQSA's performance as 'excellent' or 'good'.

Universities more complimentary of TEQSA's performance than higher education providers

On almost all measures evaluated, including overall performance, universities rate TEQSA's performance higher than higher education providers do. That said, opinions are similar across the board in terms of where TEQSA performs best, and where there is room for improvement.



Interpreting the overview analysis

The following pages provide an overall comparison of how TEQSA performs on individual metrics evaluated. Below is a legend to illustrate area to which the individual metric relates.

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

Communication and information provision is where TEQSA is perceived to perform best



	Performance (%) (Excellent / good)*	Total (excellent + good)*	
		Universities	Higher education providers
Clarity of the application guide (easy to understand) (CRICOS)	87	100	75
Usefulness of the information contained within the good practice notes	83	84	83
Treating you with politeness and respect	82	89	78
Usefulness of the information on the HES Framework (Threshold Standards) 2015 in the form of the guidance notes	81	82	79
Usefulness of meetings and/or phone calls with your case manager	80	86	79
Usefulness of information on TEQSA's regulatory policies and processes – provided through TEQSA's website and newsletters	80	89	77
Usefulness of TEQSA-facilitated webinars, together with specific advice and resources in response to the COVID-19 pandemic	80	82	80
Usefulness of information about how to prepare an application (CRICOS)	79	96	64
Clarity of the assessment scope and evidence requirements (CRICOS)	77	96	62
Helpfulness of information on how to use the provider portal (for preparing and submitting applications online) (CRICOS)	74	89	61
Usefulness of TEQSA-facilitated workshops and webinars to discuss regulatory requirements and quality issues	73	76	73
Clarity of the application guide (easy to understand) (TEQSA)	73	80	71
Using a variety of media and channels to communicate sector-wide updates	71	68	75
Providing opportunities to address matters relevant to a regulatory decision, prior to a final decision being made	70	74	67
Being encouraging without setting up unrealistic expectations	70	71	70
Usefulness of feedback from TEQSA about your application (CRICOS)	70	82	60
Helping the sector as a whole to protect students	69	78	64

Significantly higher than the total at the 95% confidence interval.

Base: All respondents (n=74-126), Universities (n=5-44), Higher education providers (n=35-78).

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

Mid-tier performing aspects generally relate to regulatory processes and activities, and case management



	Performance (cont'd) (%) (Excellent / good)*	Total (excellent + good)*	
		Universities	Higher education providers
Being responsive to your organisation's needs	69	77	64
Usefulness of information about how to prepare an application (TEQSA)	69	80	67
Dealing with your organisation efficiently	68	79	61
Helping the sector as a whole to deliver quality higher education	68	69	66
Clarity of the assessment scope and evidence requirements (TEQSA)	68	80	68
Usefulness of health check phone call at the onset of the COVID-19 pandemic	67	76	62
Usefulness of information provided on the National Register (showing the results of regulatory decisions)	67	70	65
Being fair and reasonable	66	76	59
Usefulness of the advice and support in relation to the reduction of administrative regulatory burden (including initiatives in response to the commencement of COVID-19 pandemic)	65	63	64
Providing your organisation with the opportunity to give feedback on application processes	65	67	62
Helping the sector as a whole to manage risks	63	71	56
TEQSA's revised approach to case management	63	75	57
Demonstrating an understanding of your organisation's business or operating environment	61	76	51
Strengthening your organisation's capacity to protect students	61	65	57
Demonstrating an understanding of your organisation's specific needs	60	74	52
Explaining clearly and constructively why decisions were made	59	58	56
Helping your organisation deliver quality higher education	59	55	60

Base: All respondents (n=74-126), Universities (n=5-43), Higher education providers (n=50-76).

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



Lowest rated measures relate to timeliness

	Performance (cont'd) (%) (Excellent / good)*	Total (excellent + good)*	
		Universities	Higher education providers
Providing your organisation with the opportunity to give feedback on the annual risk assessment process	58	67	51
Providing quality feedback on whether your organisation is meeting expected standards	58	61	54
Listening to your organisation's views on better ways to protect student interests	58	64	54
Implementation and transition to the new Provider Category Standards	57	58	55
Listening to your organisation's views on improving quality assurance (for example, feedback on guidance notes and other regulatory material / information)	56	65	49
Tailoring an application process to meet your needs	56	69	52
Usefulness of feedback from TEQSA about your application (TEQSA)	55	80	53
Timeliness of feedback from TEQSA about your application (CRICOS)	55	79	35
Strengthening your organisation's capacity to manage risks	55	58	51
Being consistent and clear about the goal posts for successful decision outcomes	54	60	50
Having an accountable regulatory process where decisions are transparently justified	53	59	46
Suggesting networks and resources that your organisation might use to improve performance	50	58	45
Timeliness of feedback from TEQSA about your application (TEQSA)	44	80	41
Providing timely feedback on whether your organisation is meeting expected standards	44	52	40
Giving timely feedback to save your organisation using its resources on applications that are unlikely to be successful	43	46	40
Listening to your organisation's views on ways to reduce regulatory administrative burden	42	38	44
Minimising the time taken between submitting an application and first receiving a regulatory decision	40	52	33

Significantly higher than the total at the 95% confidence interval.

Base: All respondents (n=74-126), Universities (n=5-42), Higher education providers (n=34-72).

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



Communication



Section highlights: Communication

TEQSA-provided information is deemed useful

On all communication measures evaluated, at least two-thirds of providers rate TEQSA's performance as either 'excellent' or 'good'. On most measures, around one in five (or more) of providers rate TEQSA's performance as 'excellent'.

Information pertaining to COVID-19 is among the most useful

A quarter of providers (26%) consider the usefulness of TEQSA-facilitated webinars, together with specific advice and resources in response to the COVID-19 pandemic to be 'excellent'. This, and information on the HES Framework (Threshold Standards) 2015 in the form of the guidance notes, both have the highest proportion of 'excellent' ratings.

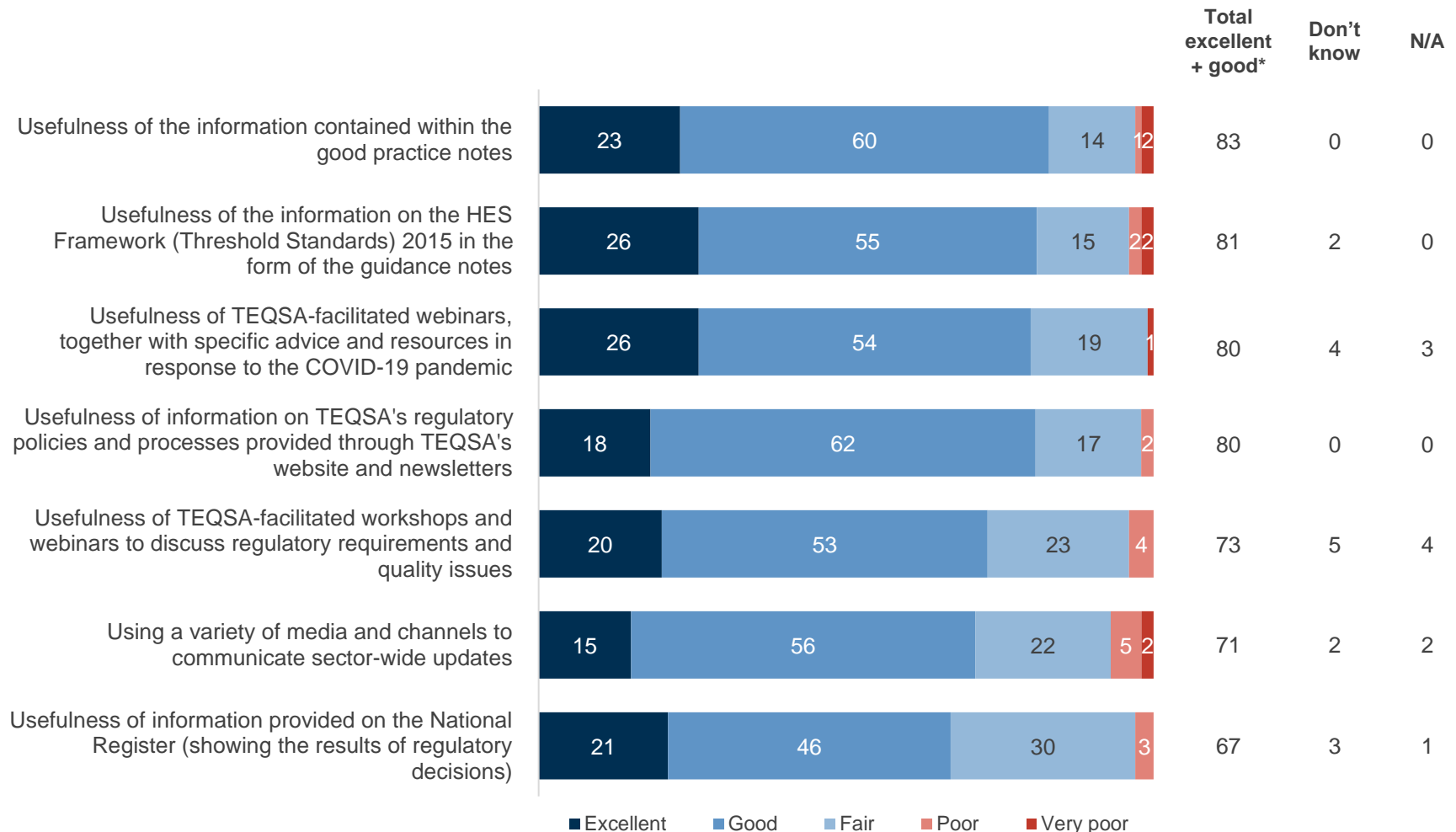
TEQSA performing relatively less well on usefulness of National Register information

Though a majority still consider TEQSA's performance on information provision here as either 'excellent' or 'good' (67%), relative to other communication items evaluated, it is the least well rated. That said, most of the remaining providers rate this information as 'fair' (30%), rather than 'poor' (3%).

The usefulness of TEQSA-provided information is well regarded



Performance of TEQSA's communication in the last 12 months (%)
Among those who provided a rating



Q7. How would you rate TEQSA's performance over the last 12 months in terms of the following items?

Base: All respondents (n=126)

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



Consultation



Section highlights: Consultation

Feedback opportunities on processes are well regarded

TEQSA's highest rated measures relate to the opportunities to provide feedback on processes – specifically, the application processes and the annual risk assessment processes. Around three in five providers rate TEQSA's performance on these measures as either 'excellent' or 'good' – including one in five who rate TEQSA as 'excellent'.

Increased timeframes and resulting changes from feedback are sought

While it is clear that feedback opportunities are appreciated, providers would like more time to be able to provide their feedback and to understand the outcomes that result from their feedback.

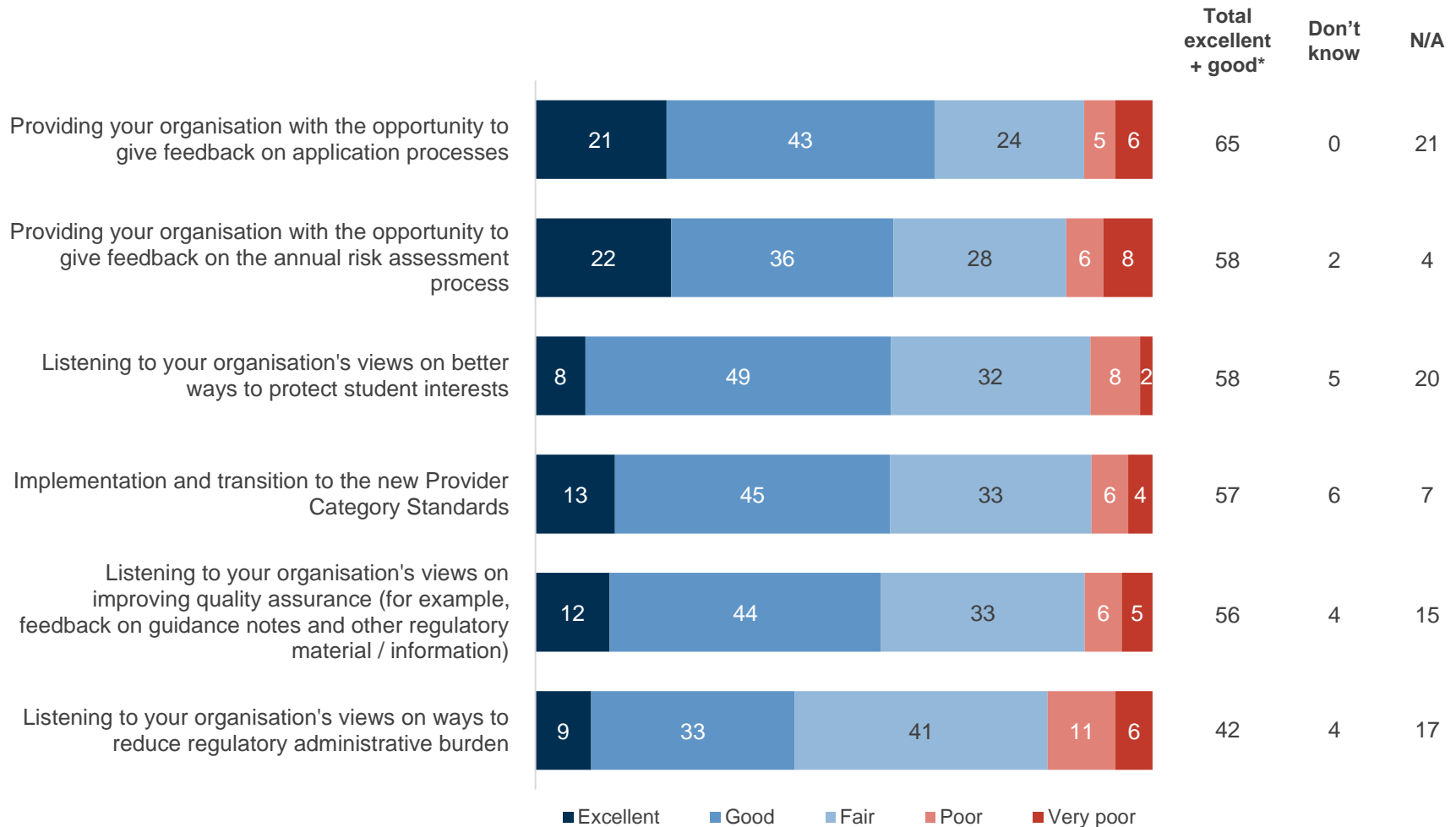
Performance in reducing administrative burden is rated lower

The only consultation measure where less than half of providers (42%) 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'. Close to one in five providers rate performance here as 'poor' or 'very poor'. Provider Information Requests and material change notifications are mentioned as being onerous.

Opportunities to provide feedback on processes is where TEQSA is perceived to perform most strongly



Performance of TEQSA's consultation in the last 12 months (%)
Among those who provided a rating



Q8. How would you rate TEQSA's performance over the last 12 months in terms of...?

Base: All respondents (n=126)

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

Providers note some grievances with the risk assessment process and the feedback loop



The majority of providers rate TEQSA well on the opportunity to provide feedback on the annual risk assessment process (58% rate this as ‘excellent’ or ‘very good’). Verbatim feedback from the open-response comments suggest that some providers want to see greater change occur as a result of this feedback. There is a view that the time and effort some providers put into providing feedback on risk assessments makes little difference to the final risk ratings. Closing the loop on feedback consultations would assist.

Others wish to understand what changes will be made to mitigate risks, or what providers can do themselves to help manage the risks identified through the process.

Timelines for consultations and provision of feedback are also a sore point for some providers. Appropriate timelines are even more important in the context of COVID-19, when providers are finding themselves more under-resourced than ever.

Comment was also received about data quality. Providers can become less confident in the risk assessment process if overt efforts are not made to rectify any data inaccuracy. It is clear that attempts to resolve this have been greatly appreciated.

“Whilst providers were given an opportunity to respond to the 2020 risk assessment, responses were not considered or actioned (e.g. errors were not rectified, questions were not answered, no counter-response provided explaining why risk ratings were not changed, no acknowledgement of the information provided in the response) by TEQSA rendering this exercise futile.”

“We have been unhappy with the Risk Assessment process. TEQSA gave us 10 working days to respond to the Risk Assessment (with no prior warning as to when it would be released). We met that deadline to provide feedback during a business operational time that coincided with our financial end of year external audit. TEQSA then took three months to acknowledge the feedback, and chose not to amend the risk rating despite the additional information provided.”

“For risk assessments, responsiveness was incredibly slow this year (i.e. multiple weeks to get a response to simple queries).”

“The risk assessment process was not only well behind schedule, but concentrated on financial data for a period of the year that obviously experienced a significant financial downturn. The reasons for that focus were not stated or clear and the data was not reflective of reality. The opportunity to respond was a very small window of time.”

“It would be helpful if TEQSA could report back on results of consultation so that providers have confidence that their views have been taken into consideration.”

“The Annual Risk process has been a bit fraught with data being (we believe) inaccurate. Credit to TEQSA though in that an incredibly positive lady ... contacted us to review this.”

Provider Information Requests and material change notifications are seen as onerous



‘Listening to your organisation's views on ways to reduce regulatory administrative burden’ is the only consultation measure where less than half of providers (42%) rate TEQSA's performance as either ‘excellent’ or ‘good’.

When given the opportunity to provide feedback on ways that ‘TEQSA-specific reporting burden could be lifted without adversely affecting the performance of your organisation’, nominated issues include:

- The Provider Information Requests (PIR).
- Material change requirements and notifications.
- Some duplication of reporting requirements by other Federal Government agencies other than TEQSA.
- Ad-hoc, one off information requests.
- Accreditation requirements, while noting that the process needs to retain its integrity.

“The accreditation of programs should not be required to submit learning materials, specifically from existing providers. This is a financial burden that, should the course not be accredited, is a major financial loss.”

“The PIR – very manual and time consuming and fails to be flexible enough to account for provider nuances (e.g. staff profile). Admissions transparency information and data – information is so vague it isn't helpful to prospective students.”

“We would support maintaining the lower level of reporting requirements on material changes.”

“More coordination between regulators and professional bodies to avoid duplication.”

“With regard to reporting burdens only, it would be nice not to be burdened with one-off requests for information on matters that seem to take the Education Minister's interests at a given time or are instigated by press reports.”

“We have found that we are required to submit information directly to other government agencies, which is duplication of information provided to TEQSA. Most recent example is TPS domestic FEE-HELP data, perhaps different format but same data none the less.”

“We had to submit separate applications to TEQSA and ASQA for CRICOS renewal. Massive duplication.”

“The PIR deadline seems to have moved from August to end of June with little consultation or reasoning.”



Regulatory processes and activities



Section highlights: Regulatory processes and activities

TEQSA's polite and respectful conduct is a strong point

Over half of providers (57%) believe TEQSA's performance is 'excellent' in treating them with politeness and respect. A further 26% rate TEQSA as 'good'. Verbatim comments reinforce this sentiment, with some providers offering individual anecdotes of a strong working relationship with their case manager.

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

When thinking about TEQSA's regulatory approach, providers are more complimentary of the help and usefulness of advice and support to the sector as a whole, as opposed to help and assistance provided by TEQSA to strengthen an individual organisation's capacity. In particular, advice and support to reduce administrative regulatory burden at the commencement of COVID was well regarded.

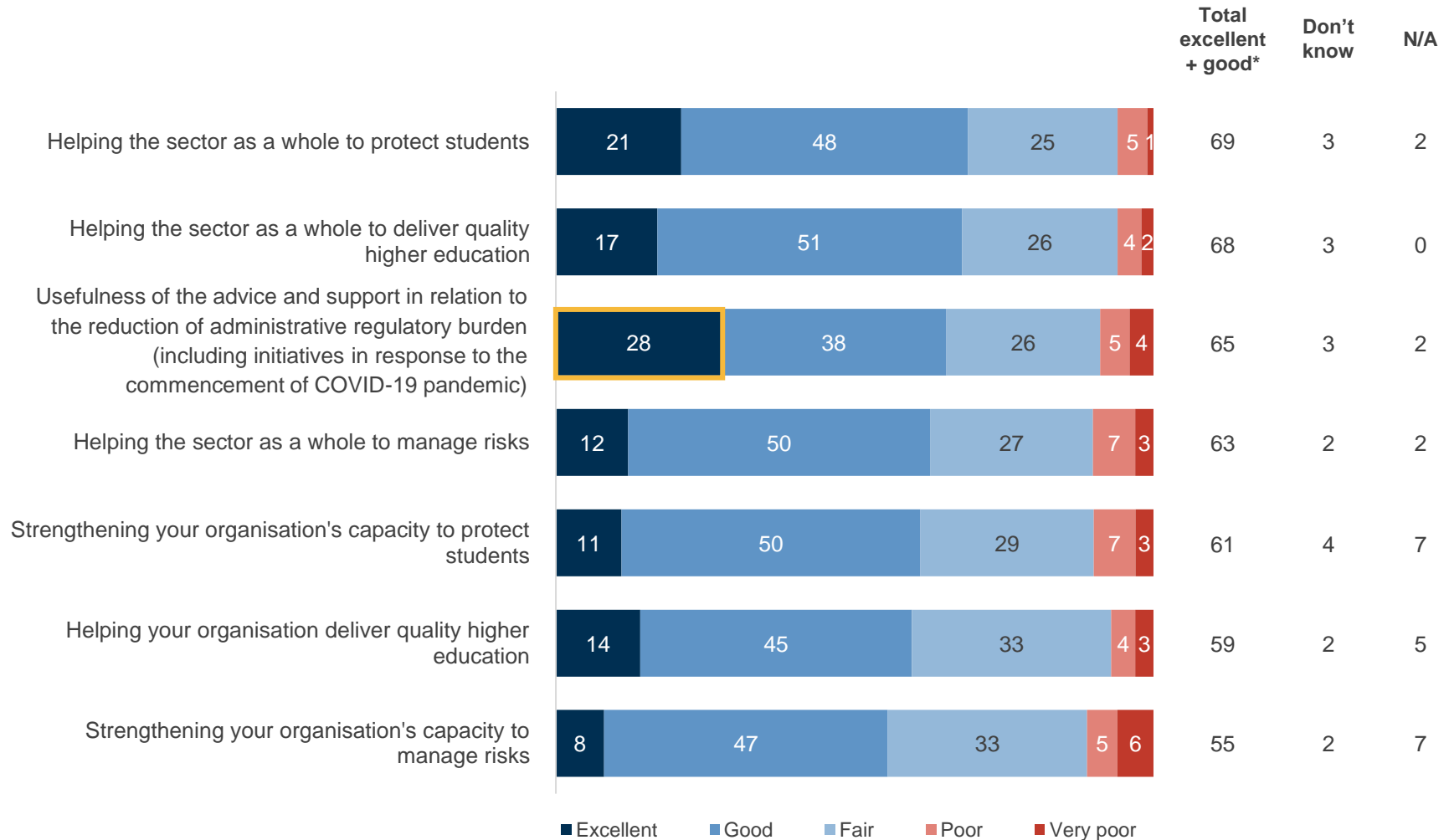
Response times relating to regulator activities are a concern for some providers

TEQSA's performance on most regulatory activities evaluated is considered either 'excellent' or 'good' by a majority. The exception is 'giving timely feedback' and 'minimising the time taken between submitting an application and first receiving a regulatory decision'. Comments suggest the timeframe between the provision of information and obtaining a response is worsening.

TEQSA’s regulatory approach is adept at assisting the sector as a whole more so than individual organisations



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?

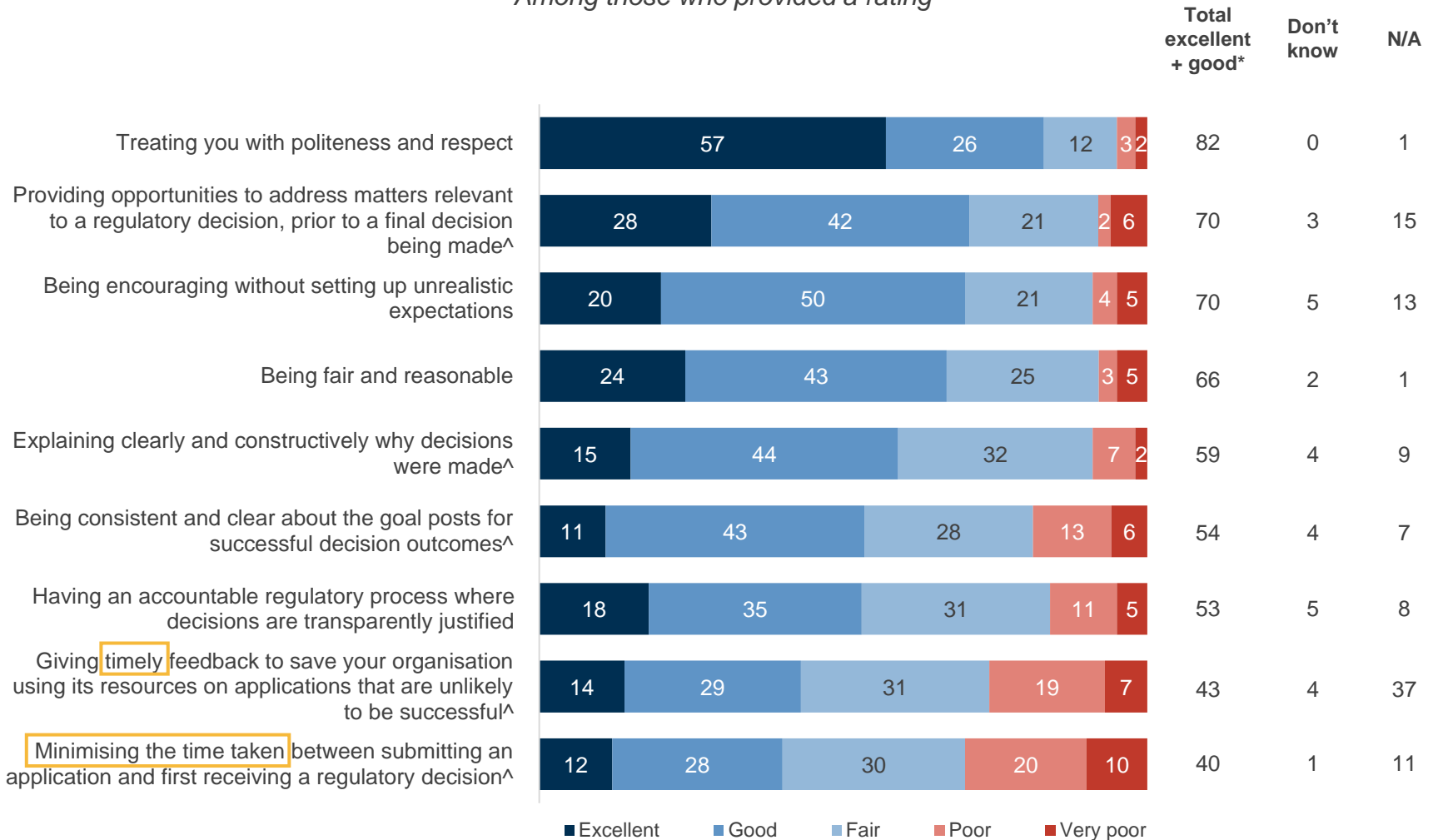
Base: All respondents (n=126)

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

More than half of providers rate TEQSA highly when it comes to treating them with politeness and respect



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=98-126)

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

TEQSA staff are very highly regarded for their manner, but timelines are an area where attention could be focused



Providers offer many compliments regarding the nature of TEQSA's conduct and the staff – 57% of providers rate TEQSA as 'excellent' in treating them with politeness and respect. The case manager approach appears to be working well in most instances, though there are a select few who are unhappy with their current case manager.

A perceived lack of timeliness in response is also a point of concern. Providers feel that they are working with unreasonable timeframes to provide information, only to wait long periods of time before hearing from TEQSA on the information they have provided. In terms of TEQSA's regulatory activity, giving timely feedback and minimising the time taken between submitting an application and first receiving a regulatory decision are the only two metrics where a minority of providers rate performance as either 'excellent' or 'good'.

"I have always found TEQSA staff to be very polite, friendly, reasonable and helpful."

The timeline issues have gotten worse over the past 12 months rather than better."



Some providers are concerned by a perceived inconsistency between expert reviewers

On being fair and reasonable, there is a perception that TEQSA can be inconsistent in their reviews and subsequent decisions. Different expert reviewers can have completely different views according to providers, leading to a perception that decisions are arbitrary and as a result, unfair.

Further, some providers would like more explanation on how decisions relating to the 2020 Risk Assessment process were made. Indeed, 16% of providers rate TEQSA as ‘poor’ or ‘very poor’ on ‘having an accountable regulatory process where decisions are transparently justified’.

“We are concerned about inconsistencies between reviewers. Types of evidence can be regarded satisfactory for an expert reviewer in one course or discipline, but dismissed aggressively by reviewers of another course or discipline. Each time, TEQSA seems to err on the side of which reviewer demands more, leading to questions around whether the proposed course is being evaluated according to a threshold or according to a personal best practice interpretation of the reviewer.”

“We had to wait ages for a decision on an accreditation and when we got the response it seemed inconsistent with earlier responses. It went to a different part of TEQSA and the left hand was not consistent with the right hand in the organisation.”

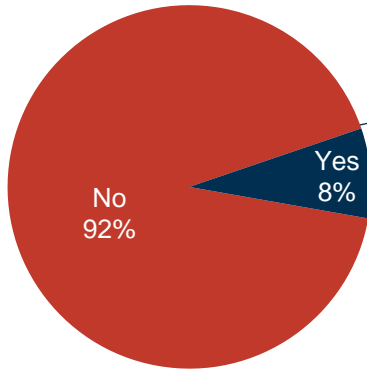
“A proposed decision was made on one of our applications based on totally different feedback from two different experts – and TEQSA chose to go with the negative decision. After providing significant additional information ... the decision was changed entirely.”

“TEQSA needs to be more consistent in its assessments – different case managers and expert panels can result in different decisions and outcomes.”

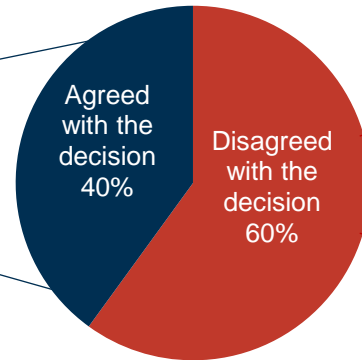
Among the few providers who disagree with TEQSA’s regulatory decision, there are mixed responses



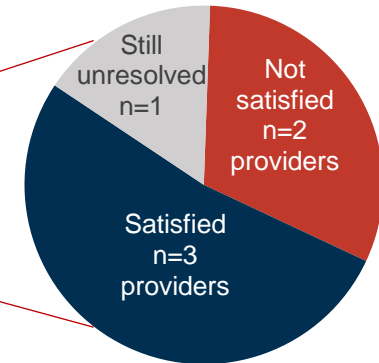
Unfavourable regulatory decision in the past 12 months



Reaction to regulatory decision*



Satisfaction with steps taken to resolve different views*



What steps were taken to resolve this matter? Among those who disagreed with the decision

“Appealed to the Administrative Appeals Tribunal.”

“Phone consultation.”

“Decision was proposed to be negative only – once we provided further information and questioned ... the validity of some of the concerns, the decision was changed to positive. However, a lot of the concerns we raised should have been picked up by regulatory staff in the first place.”

“Additional information was submitted but the decision was not varied.”

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? / Q15g. How satisfied were you with the steps taken to resolve your and TEQSA’s different views?
 Base: All respondents (n=126), those who had an unfavourable regulatory decision (n=10), those who disagreed with an unfavourable regulatory decision (n=6)
 *Caution small sample size (n=<30)



Monitoring quality



Section highlights: Monitoring quality

The quality of feedback on an organisation's standards is well regarded

A majority of providers (58%) rate TEQSA's performance on providing *quality* feedback on whether their organisation is meeting expected standards as either 'excellent' or 'good' – this includes 15% who believe performance is 'excellent' here. Note that this measure was only asked of those who submitted an application in the past 12 months.

The timeliness of TEQSA feedback presents as a potential issue

Compared to views on the quality of feedback, providers are less impressed (50% rate performance as either 'excellent' or 'good') with the *timeliness* of TEQSA-provided feedback on meeting expected standards. Almost a quarter of providers deem performance here as either 'poor' or 'very poor'. Again, please note that this measure was asked of those who submitted an application in the past 12 months.

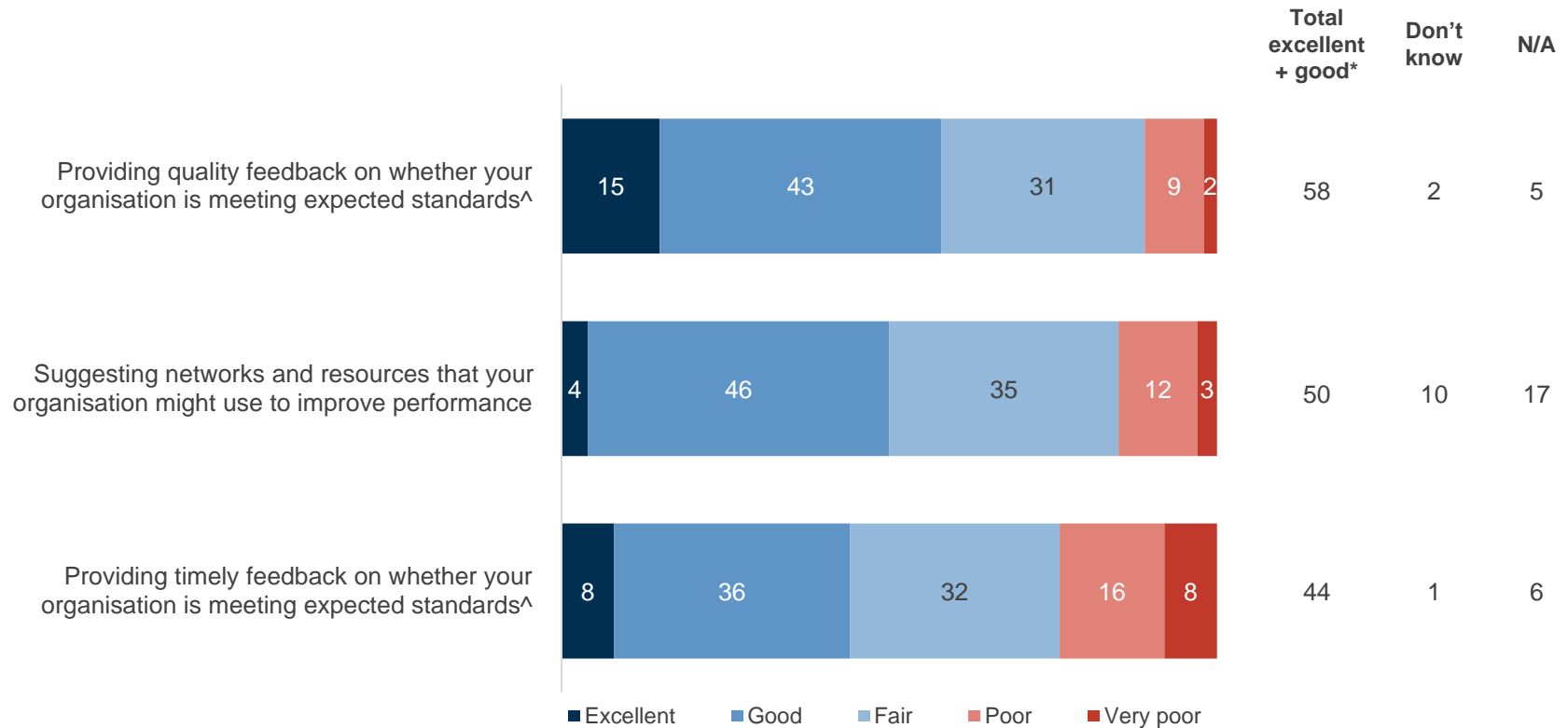
Potential lack of awareness about resources to improve performance

More than a quarter of providers can not rate TEQSA's performance on 'suggesting networks and resources that your organisation might use to improve performance' because it is 'not applicable' (17%) or they simply 'don't know' (10%). This level of non-response suggests that some providers may not have been offered advice on resources they could use to improve performance.

Feedback is of good quality, but it is less timely; some may be unaware of networks and resources



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=98-126)

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



Applications



Section highlights: Applications

Providers are satisfied with the clarity and usefulness of application information

With respect to both TEQSA and CRICOS applications, the clarity of the application guide, clarity of the assessment scope and evidence requirements and the usefulness of information about how to prepare an application are the top-rated elements of the process.

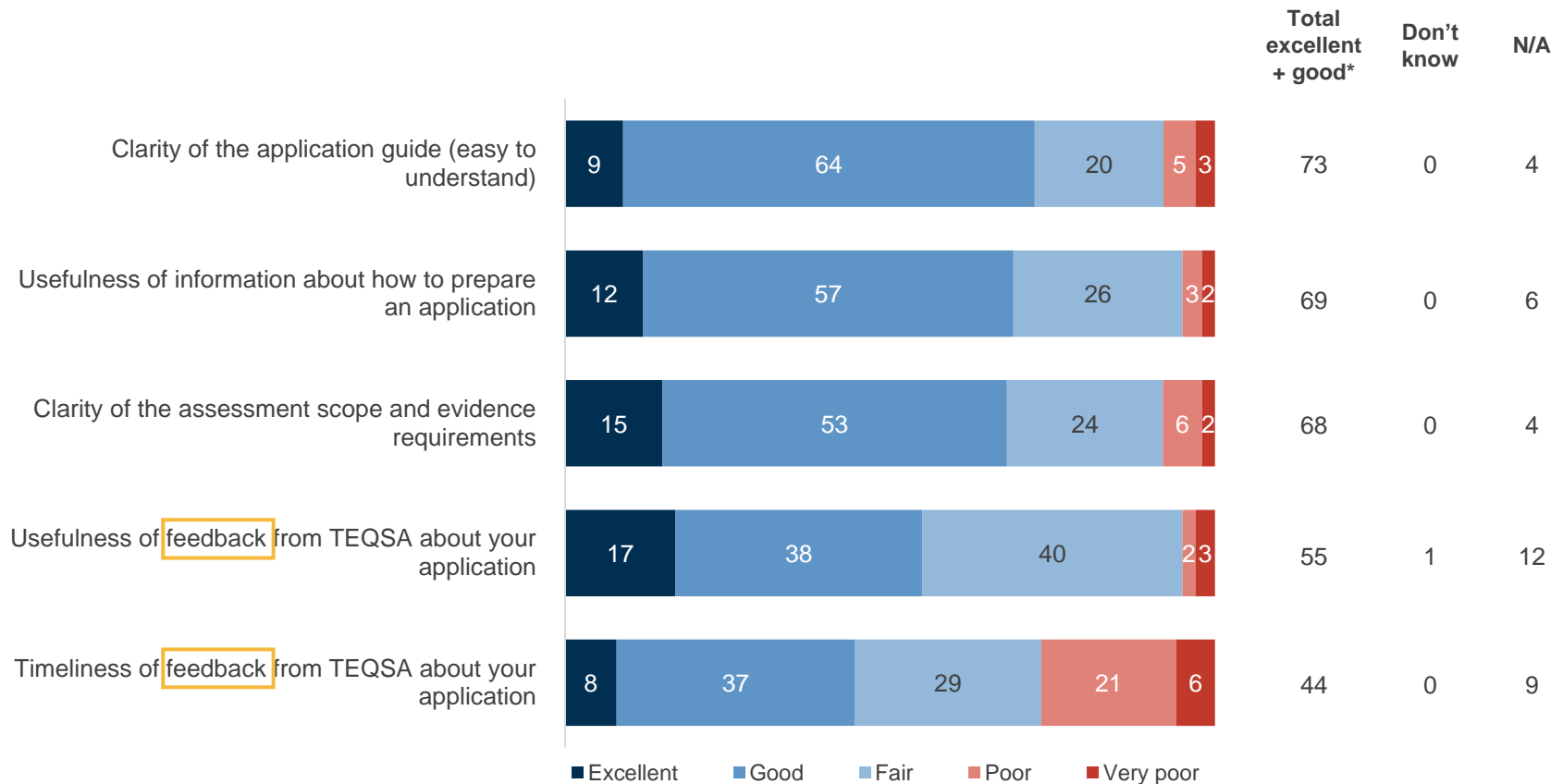
Feedback is the least well rated aspect of both the application processes

There is a sense of inequity between the deadlines required of providers, compared to the time taken to provide feedback on applications, particularly for TEQSA applications. More than a quarter of TEQSA applicants (27%) rate the timeliness of feedback on their application as 'poor' or 'very poor'; 16% of CRICOS applicants similarly do.

Providers understand the application process, but the timeliness of TEQSA's feedback is an issue



Performance of TEQSA's application process over the last 12 months (%)
Among those who provided a rating



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

Base: Those who applied for TEQSA registration, accreditation and/or self-accrediting authority (n=69)

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

Timeliness of feedback provided can feel unfair to providers who strive to meet deadlines



In relation to TEQSA applications only, some providers are unsatisfied with the feedback process because of both the nature and timelines of the feedback.

Providers feel that they meet the timeline expected of them, so the same respect for timings should be made by TEQSA.

The time taken to respond and provide feedback on applications appears to cost providers money.

There is some mention too of the need for TEQSA to be proactive in communications, not just reactive.

Further, some commentary is provided regarding the Confirmed Evidence Table and the need for more clarity about what is required.

“Feedback is rarely balanced. The approach is generally only to identify negatives and remain silent on positives. We infer positives from the silence.”

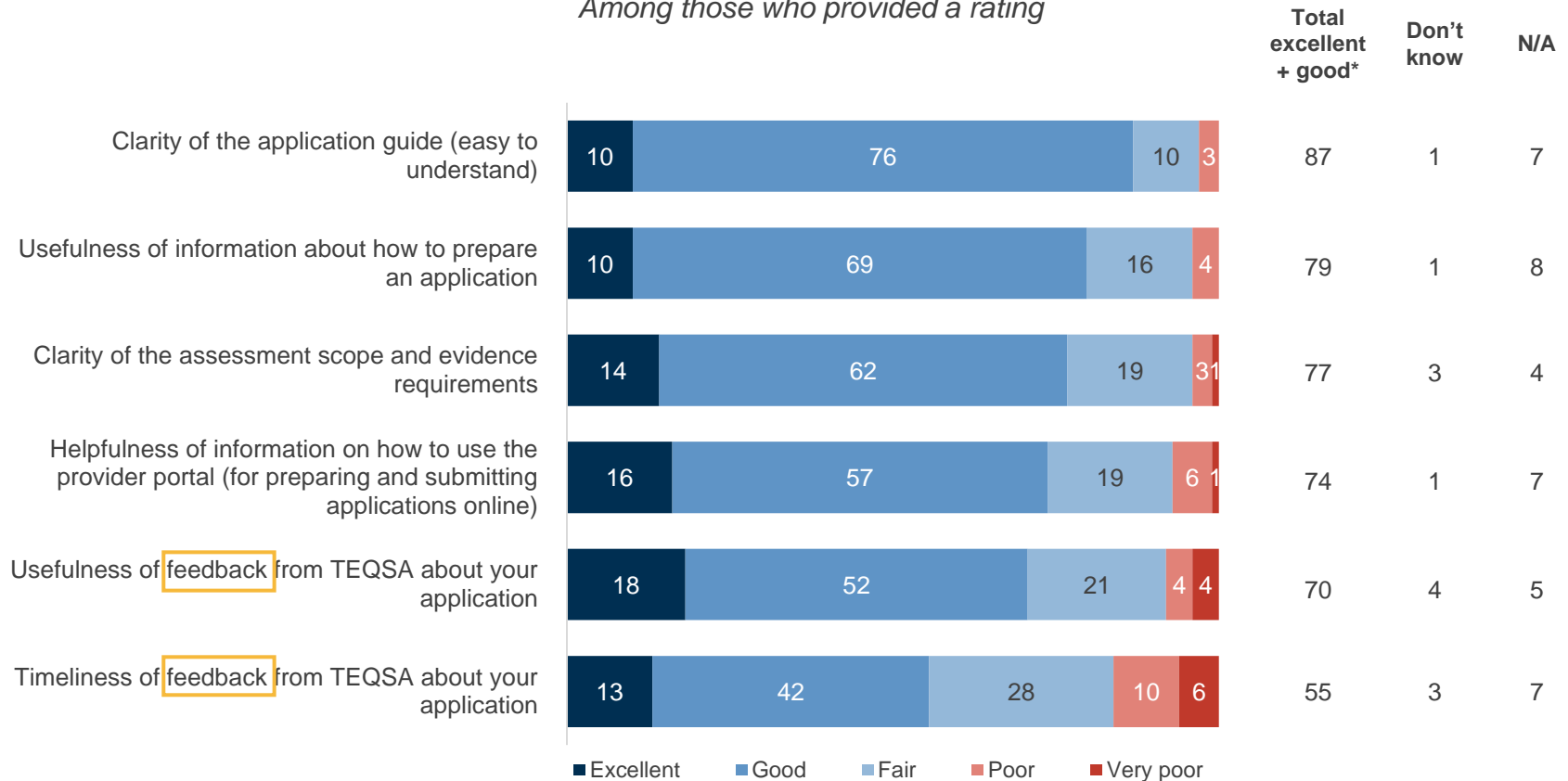
“TEQSA processes are extremely slow, unrealistically slow. It took more than 3 months for TEQSA to respond to a voluntary undertaking they requested of us! The delay was apparently due to a staff member taking unexpected leave. Why is it that TEQSA has the freedom to delay processes whenever they feel like it yet place tight deadlines on providers? If this is due to a lack of staff or skilled staff then there is a serious problem with the model and this is going to be even more problematic in the future when cost recovery models kick in and TEQSA decide how long they spend on any applications. I assume/expect that when such a model comes into force, TEQSA will also provide an itemised account (as lawyers do) along with an invoice for payment so it is a clear and justifiable expense.”

“The expectations and evidence requirements are clearly stated. However, TEQSA experts can make comment on, and ask for, information that was not specified in the Confirmed Evidence Table and seek additional information, or criticise the lack of information, that does not seem relevant to an accreditation application or which has previously been provided to TEQSA in a different context.”

CRICOS applicants are more satisfied with the process compared to TEQSA’s application process



Performance of TEQSA following CRICOS application process over the last 12 months (%)
Among those who provided a rating



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

Base: Those who indicated they applied for CRICOS or renewals (n=74)

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



TEQSA's case management



Section highlights: TEQSA's case management

Majority aware of new approach and have had a new case manager

Three quarters of providers (75%) say they are aware of the changes TEQSA has made to its case management approach over the past two years – meaning a quarter are still unaware of any changes. Almost two-thirds of providers (63%) have experienced changes to their case manager contact over the past 12 months.

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

A third of providers deem the usefulness of meetings and/or phone calls with their case manager as 'excellent', with a further 47% rating this aspect of case management as 'good'. Interestingly, 14% were unable to rate the usefulness of a COVID-19 health check phone call because they said it was 'not applicable' to them. A further 11% 'don't know', suggesting they may not have had a phone call.

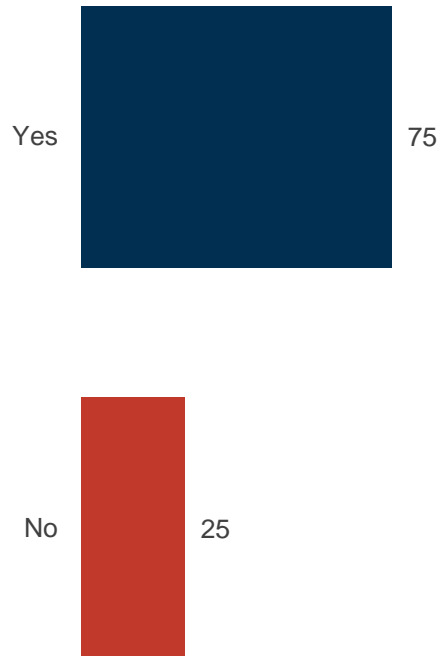
Case managers are less well-versed in understanding individual organisation's needs

An understanding of both the organisation's business or operating environment, and their specific needs, are the lower-rated aspects of case management. Commentary regarding poorer case management ratings reflect this sentiment. Other grievances cited include frequent changes to case managers preventing the formation of deep relationships and a lack of proactive communication.

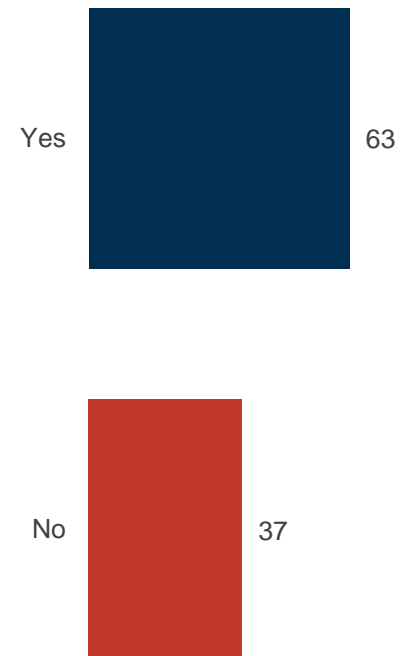
Most providers are aware of the changed case management approach and have experienced a change



Aware of changes TEQSA made to its case management approach over the past two years (%)



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

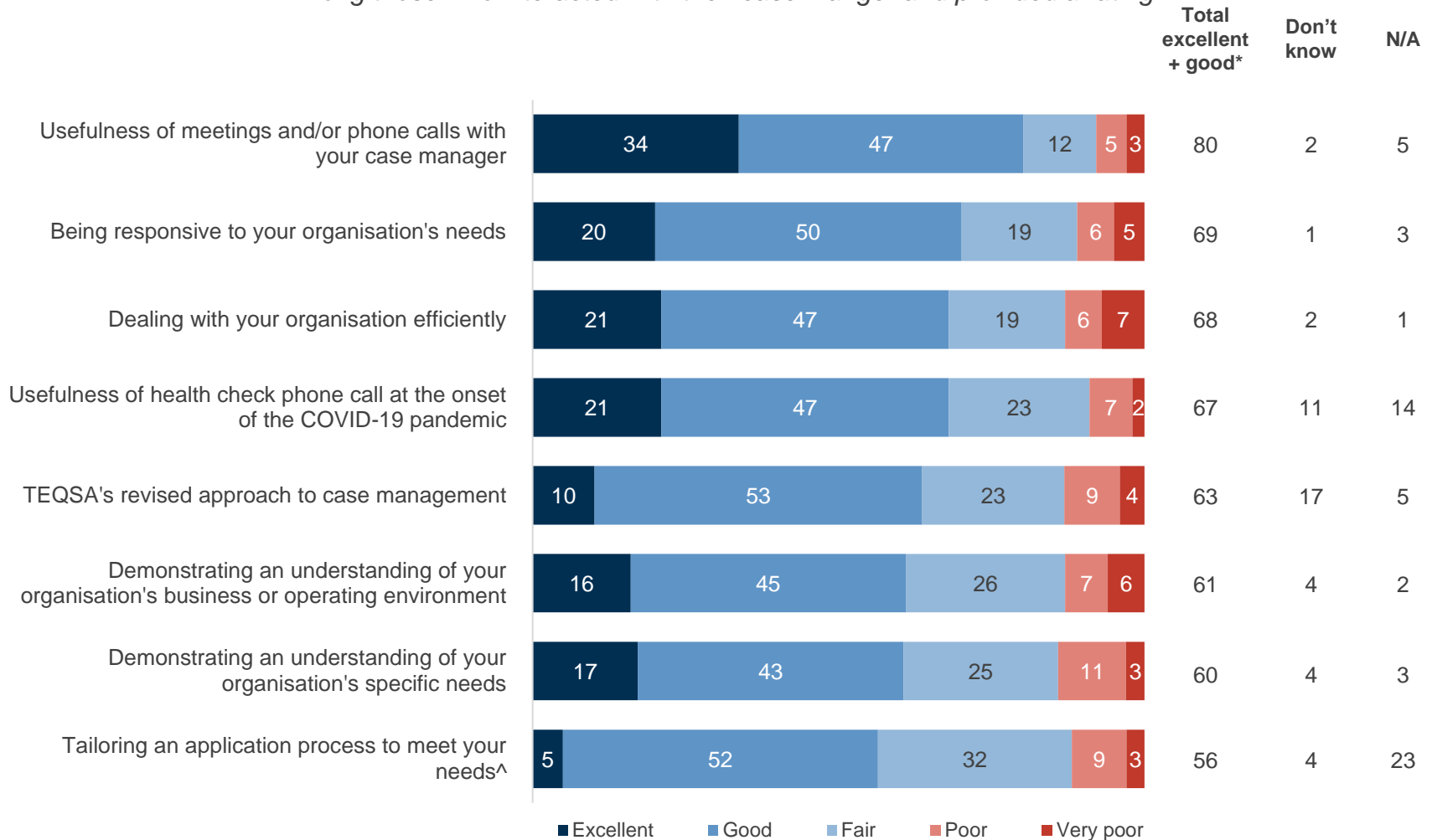


Q14a Are you aware of the changes TEQSA has made to its case management approach over the past two years? / Q14b. Did you experience changes to your case manager contact over the past 12 months?
 Base: All respondents (n=126)

Phone calls and meetings are appreciated but some may not have received COVID-19 health check calls



Performance of TEQSA's case management approach in the last 12 months (%)
Among those who interacted with their case manager 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=91-115)

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

Many providers are complimentary of their case managers, but others feel underserved



Poor case management ratings can mostly be attributed to people feeling under serviced.

Providers are frustrated when case managers have little understanding about their organisation and specific needs or situation. A lack of understanding is exacerbated when case managers change frequently, and a relationship and mutual understanding then needs to be developed with a new case manager.

Some providers feel case managers are reactive, rather than proactive, and tend to take questions on notice rather than having the knowledge to respond. There are also instances cited where providers follow up with case managers multiple times to pursue a response to a query.

A few providers feel the new case management approach leading to 'silos', whereby information may not be being shared as it should be between different areas of TEQSA.

It must be noted, however, that there are many providers who are complimentary of their relationship with their case manager.

There is also some understanding among providers that COVID-19 has exacerbated the workload of TEQSA staff and that this may contribute to unmanageable workloads of case managers.

“Our case manager is great but at times was not informed about some of our correspondence from TEQSA. Sometimes it seemed she was in the dark as much as we were regarding requests, etc. This might have been due to changes in TEQSA processes, etc. TEQSA sometimes seems confused about its changes and how it is now expecting evidence etc to be supplied.”

“Unfortunately the responsive approach that we had become accustomed to by TEQSA case managers has not occurred in 2019-2020. We have to regularly remind our case manager that there are several unattended emails and ask regarding their progress. This may often impact upon internal processes within our organisation. There is a sense that the case manager is overloaded and unable to manage.”

“We receive no proactive communication from our case manager. The relationship between the case manager and the assessment and investigations group remains unclear.”

“I may be unclear on the new case management approach, but I scored TEQSA a ‘very poor’ if the new approach is to use one of the generic emails. We need to be able to have a deep and trusted relationship with one case manager.”

“Our case manager did not call with a health check after the onset of the pandemic. He also doesn't seem to understand our business at all, and whenever we ask him questions he can't answer them – he has to refer them to another team or a more senior staff member for answers. He seems to be more a mailbox for queries. The new case management approach with siloed teams just doesn't seem to work.”



**Changes in the
last 12 months**



Section highlights: Changes in the last 12 months

A lack of awareness about how TEQSA re-uses material

More than two in five providers 'don't know' what they have noticed about TEQSA's re-use of material that their organisation has provided in the last 12 months. This high proportion of don't know responses suggest that many providers are unaware of when TEQSA re-uses material they have provided. Some providers comment that duplication of reporting requirements is common.

Changes in the last 12 months have improved rather than worsened

On balance, more providers feel TEQSA's re-use of material and the administrative burden it imposes has improved in the past 12 months than those who feel it has worsened.

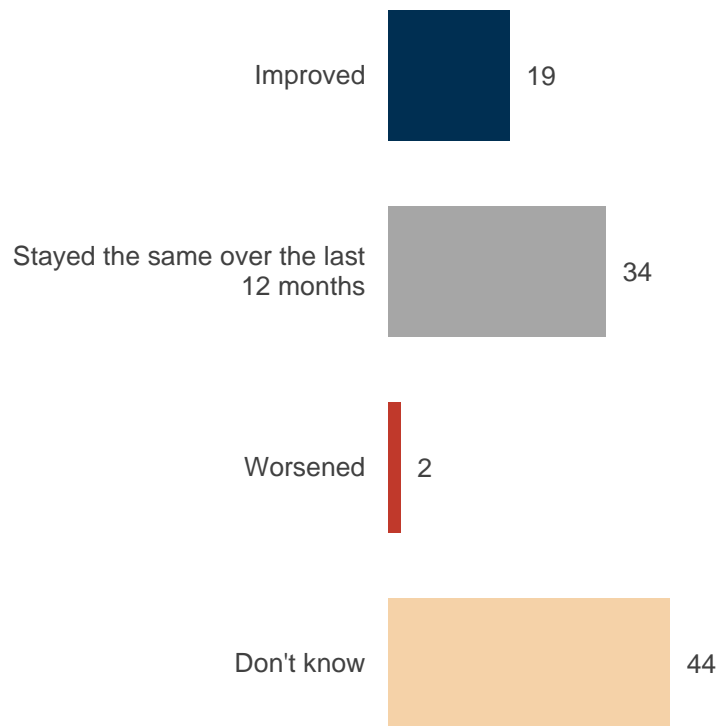
Many feel the administrative burden has not changed in the past year

Almost half of providers (47%) say the administrative burden that TEQSA's regulations impose has 'stayed the same over the previous 12 months' compared to 29% who feel it has improved, 17% feel it has worsened and 6% who don't know.

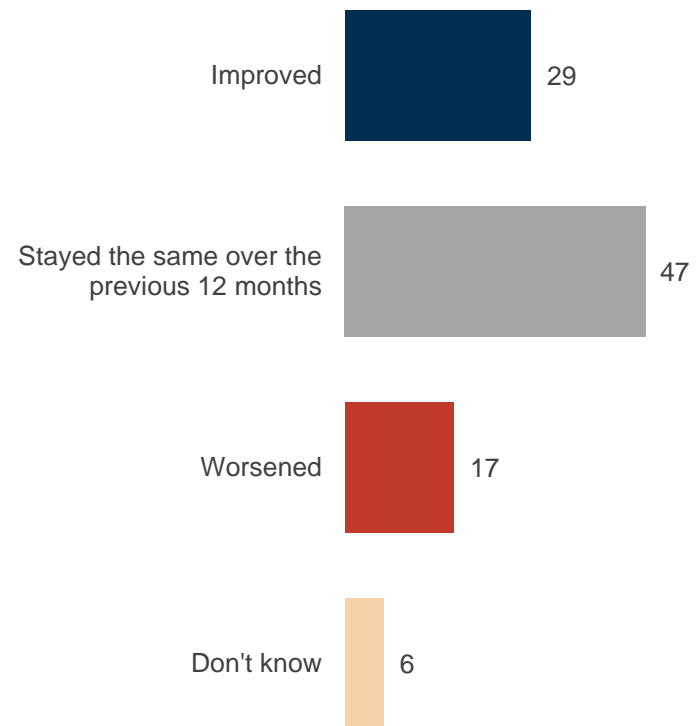
A high proportion of providers don't know how TEQSA's has re-used material that their organisation has provided



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



Administrative burden that TEQSA's regulations impose (%)



Q15a. In the last 12 months what have you noticed about TEQSA's re-use of material that your organisation has provided? One example is pre-filling of forms with previously provided information. / Q15b. In the last 12 months, what have you noticed about the administrative burden that TEQSA's regulations impose on your organisation?

Base: All respondents (n=126)



Sector risks



Section highlights: Sector risks

International border closures and the implications of this of great concern

More than eight in ten providers (85%) consider international border closures to be a 'high threat'. Providers mention the differences in Australia's border closures with that of other student destinations, vaccine hesitancy and uncertainty about what will happen when borders reopen as some of their concerns. Providers want to ensure Australia remains an attractive destination for international students.

Cost recovery a new concern among providers

The impact of cost recovery on smaller, private providers is cited as a concern. Many feel it unfairly disadvantages smaller providers and expect that many may be forced to close as a result.

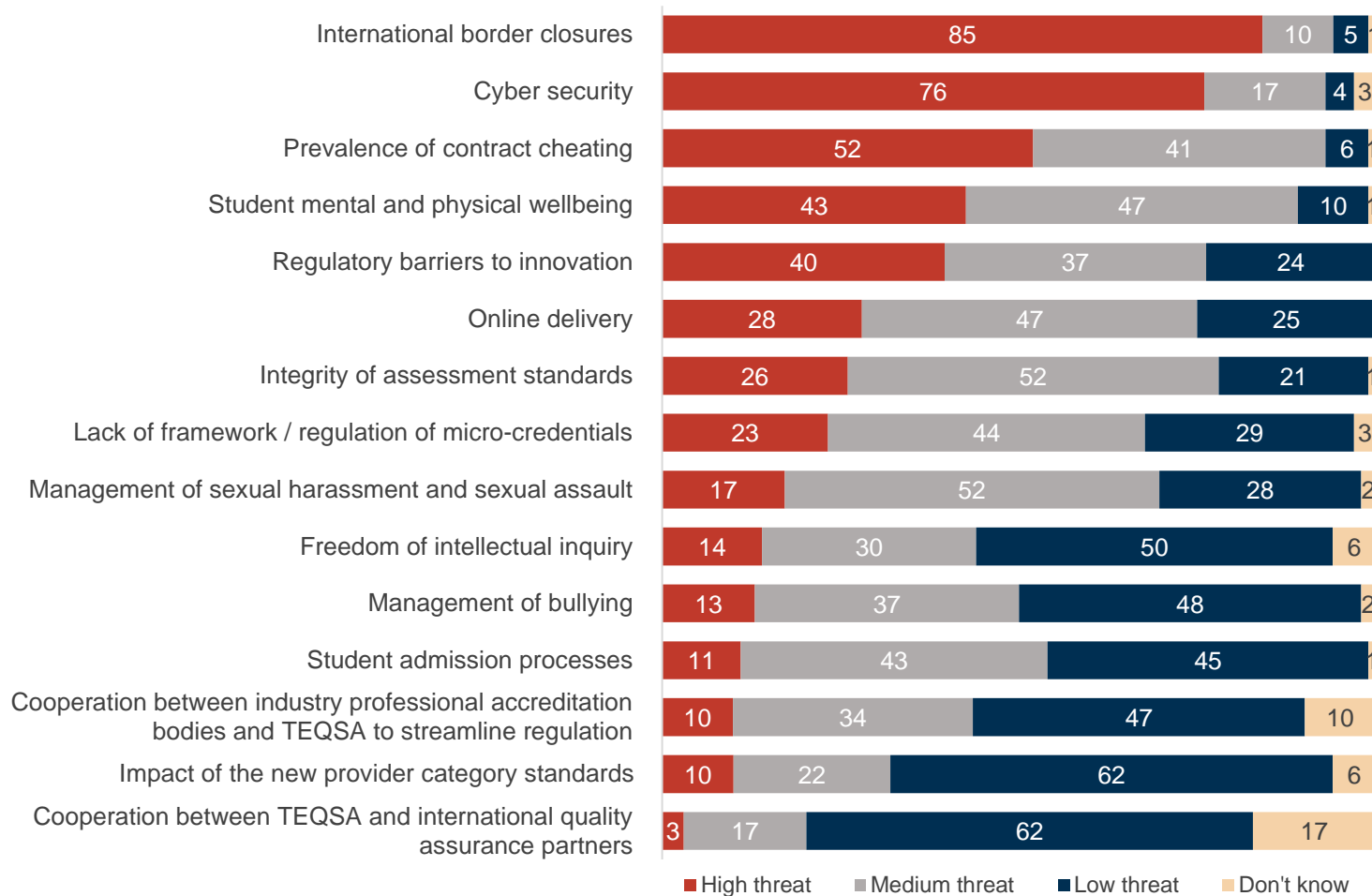
Online delivery may raise quality concerns but blended learning options should be considered

Online delivery is perceived by many to reduce the quality of education provided and increase the risk of contract cheating. That said, providers also appreciate that some students and teachers have adapted well to remote learning options and feel that TEQSA should provide good practice guidance on high-engagement blended learning models, similar to its guidance on online learning.

International border closures are perceived to be the most pressing threat to the sector



Sector risk threat levels (%)



Q16. TEQSA has a responsibility for environmental scanning to identify emerging risks to the quality and reputation of the sector. These risks need to be developed in partnership with all higher education providers. From the list of future risks that were reported in the 2019 survey, in addition to those we are currently aware of, we have selected the following for your comment. What level of threat do you think the following factors pose to the quality of the sector in coming years?

Base: All respondents (n=126)

Concerns and threats to the sector extend beyond those quantitatively evaluated



Frequently mentioned immediate or future threats, beyond those evaluated quantitatively, that providers feel TEQSA should be investigating include:

- English proficiency of international students and student visa fraud.
- Budget cuts in the higher education sector, coupled with the impact of the cost recovery model and the implications for smaller, private providers.
- Inconsistencies between the regulation of independent higher education providers and universities.
- How to manage and effectively embrace blended learning options for those who want to continue with a mix of online and in-person delivery.
- The apparent poaching of students from smaller providers.
- How do we remain attractive to students when borders reopen?
- Increased competition from online learning platforms.
- The proliferation of qualifications potentially devaluing them overall.

“Poor English-speaking students managing to game the admissions process and to be accepted by universities and Higher Education Providers is a huge problem. Poor job outcomes in their profession once graduating means that TEQSA will need to insist that providers get rated on their success in this area.”

“TEQSA should be investigating ways for Australia to continue to be a leading educator of international students.”

“Waning standards of admissions and English proficiency processes due to the digital environment.”

“Prolonged border closures in contrast to other countries; Canada, UK, etc. How long it will take for Australia to reestablish its standing as an education destination.”

“Australia’s competitiveness for international students. USA, Canada and UK are out competing the Australian HE sector and by the time borders open Australia will no longer be competitive. Support is required to ensure the sector remains sustainable by allowing pilot programs for student return and certainty on borders opening.”

“By far the biggest threat is the Federal Government’s insistence on full cost recovery and the unfair way this is skewed towards smaller private providers and away from the university sector. This is shifting a huge burden of cost. As well, the implementation has meant that the costs remain unknown even while institutions are preparing their budgets for the financial year. This is very poorly calibrated policy that is a high risk to the sector.”



Perceived strengths and weaknesses



Section highlights: Perceived strengths and weaknesses

TEQSA's COVID-19 response is applauded

One of the common themes emerging from responses to what TEQSA does well is it's agile and responsive approach to COVID-19 over the past year. Providers are appreciative of the flexibility afforded by TEQSA over the past 12 months regarding its regulatory approach.

Many opportunities for improvement and little that TEQSA should stop doing entirely

Timeliness in responses to providers and feedback on applications is a key area for improvement along with a more nuanced approach to understanding individual providers. There is little that providers believe TEQSA should stop doing entirely, however, there is a sense that a 'one-size-fits-all' approach to treatment of providers should cease.

Advocacy role regarding the return of international students

In the coming 12 months, providers see a role for TEQSA to be more involved in advocating for the return of international students. International border closures are perceived as the greatest threat to the sector and providers are looking for guidance from TEQSA on how to manage and mitigate this.



Perceived strengths and weaknesses of TEQSA

Strengths – what TEQSA does well

- Communication with stakeholders.
- Professional and polite interactions.
- Information provision – guidance notes are very much appreciated.
- COVID-19 management and flexibility afforded by TEQSA during this time.
- Case manager approach – where providers are happy with their interactions.
- Efforts to engage with stakeholders and allow them to provide feedback.
- Keeping the sector informed of risks.

Opportunities – what TEQSA should do more

- Seek a deeper understanding of individual providers and their needs – so that they can be provided with relevant and tailored advice to improve their operation.
- Helping providers understand how to manage risks.
- Provide guidance on best practice blended learning models in the wake of COVID-19 and the rise of online learning.
- Advocating for the return of international students.
- A more balanced approach toward all providers – address the perceived imbalance between treatment of universities and other providers.

Weaknesses – where TEQSA could improve

- Timeliness of processes and feedback provision.
- Reduce staff turnover so providers can build meaningful relationships with TEQSA staff and case managers.
- A more nuanced approach to regulation – some smaller providers feel disadvantaged by carrying the same regulatory burdens as much larger providers. Cost recovery is raised as one example of this.
- Consistency in responses to queries and application feedback.
- Improved advice regarding material change notification.
- Longer consultation timelines for important issues.
- Improve synergy and integrate the shared requirements across ASQA, CRICOS and TEQSA to reduce duplication for dual sector providers.

Threats – what should TEQSA stop doing

- Perceived unfair treatment of private providers compared to universities.
- Duplication with other professional bodies and regulators.
- Cost recovery a major concern of smaller providers who call for it to not go ahead.



Select verbatim responses: Strengths and opportunities

What TEQSA does well?

“Production of notes and webinars, etc. for ensuring the sectors access to up-to-date information.”

“Flexibility in the regulatory approach such as in the response to COVID-19. This demonstrated a responsive approach welcomed by the sector.”

“TEQSA’s case management approach works very well. Personalised contact is very important.”

“Information on the website is very good and useful. I refer to it daily and I find the guidance notes particularly helpful.”

“Communication during difficult times, and the provision of supporting documentation and resources for the sector.”

“The accessibility of case managers, and their willingness to assist as much as they can, is highly valued.”

“TEQSA engaged in a responsive and agile way to assist the sector to face the challenges presented by COVID.”

“Case manager approach has been great. DO NOT STOP THIS!”

“Guidance through good practice guides, guidance notes; communications through the newsletter – there are usually many items of interest that I click on to read further information on; a reasonable and proportionate response to regulation throughout the pandemic.”

What should TEQSA be more involved in?

“Aim for speedy turnaround processes.”

“Contract cheating. I cannot emphasise enough how critical that activity is to Australia's higher education QA. HEPs can do nothing separately – we need a co-ordinated, national response, with TEQSA leading on legal responses and data capture.”

“Seeking to understand in detail each of its higher education providers (their distinctives, their needs, the burdens they are bearing).”

“Working with providers, upon receipt of the Provider Risk Assessment Report, as to directions that the provider can seek guidance for improvement.”

“Annual conversations to understand the business needs of each provider so that a plan can be developed to map activity throughout the year.”

“Consider State offices, visits to providers to get to understand business models.”

“Improvement and facilitation of online or blended delivery models.”

“Ideally, TEQSA would be more involved in setting the parameters around students returning from overseas; e.g. TEQSA should be advocating for international student return. Time for the Federal Government to open up major facilities for students to come to Australia!”



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

Where could TEQSA improve?

“Timeliness of response and clarity of information for assessments, etc.”

“The one-size-fits-all approach – private providers are very different in many ways to universities (especially in resourcing and staffing) yet TEQSA’s approach often fails to delineate between the two. Private providers are not universities and the expectations of TEQSA should be adjusted accordingly.”

“This is an old story – relate the regulatory burden to the size of the organisation. Small providers cannot be expected to achieve the same volume of paperwork as the large publicly funded universities.”

“Faster turnaround on queries with consistent responses.”

“Have standards more nuanced to different sectors of the industry. Sometimes it seems standards are a one-fit for university-type institutions, but do not accurately reflect criteria and conditions for other sectors, particularly pathways.”

“The turnaround time for processing course accreditation/reaccreditation applications could be further streamlined. A 30 day turn around would be great.”

“Retaining staff, sometimes the churn makes it difficult for the university to build relationships.”

“Further streamlined regulatory scrutiny for dual sector providers via TEQSA and ASQA working together.”

What should TEQSA stop doing?

“Stop favouring universities and stop the unfair cost recovery plans.”

“As soon as it is safe to do so – stop being office-bound and get out to all the regions and visit us!”

“The 2020 Risk Assessment process was flawed. Suggest not using this method in 2021.”

“Duplicating activities that larger and more mature institutions already undertake, e.g. risk assessments.”

“Requesting for data which is already available from other government departments.”

“Over burdening small HEPs with the same regulatory requirements for re-registration and re-accreditation.”

“The fee recovery program concerns us as a small provider.”

“TEQSA must stop considering growth in student numbers a RISK to a provider (in provider risk ratings).”

“Favouring universities over other public providers of education.”

“Asking for unnecessary reports – the additional student experience data we had to provide during COVID to allow TEQSA to prepare a not very useful report.”



Appendices



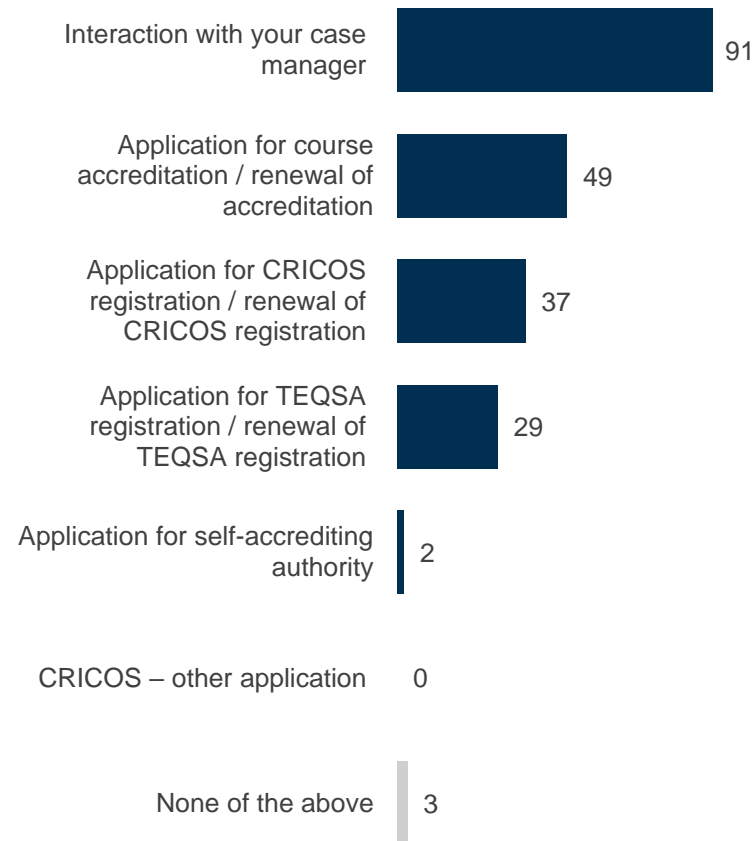
Appendix A: Interactions with TEQSA

Almost all providers have interacted with their TEQSA case manager in the last 12 months



Interactions with TEQSA in the last 12 months (%)

Multiple response allowed





Appendix B: Comparison to 2019 results



Communication

Performance of TEQSA's communication (%) Among those who provided a rating

	Total excellent + good*	
	2019	2021
Usefulness of the information contained within the good practice notes	N/A	83
Usefulness of the information on the HES Framework (Threshold Standards) 2015 in the form of the guidance notes ~	88	81
Usefulness of TEQSA-facilitated webinars, together with specific advice and resources in response to the COVID-19 pandemic	N/A	80
Usefulness of information on TEQSA's regulatory policies and processes – provided through TEQSA's website and newsletters ~	89	80
Usefulness of TEQSA-facilitated workshops and webinars to discuss regulatory requirements and quality issues ~	79	73
Using a variety of media and channels to communicate sector-wide updates	71	71
Usefulness of information provided on the National Register (showing the results of regulatory decisions)	71	67

Q7. How would you rate TEQSA's performance over the last 12 months in terms of the following items?

Base: 2021 respondents (n=115-126); 2019 respondents (n=125-140).

Significantly **lower** than the 2019 result at the 95% confidence interval.

* 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 2019.



Consultation

Performance of TEQSA's consultation (%) Among those who provided a rating

	Total excellent + good*	
	2019	2021
Providing your organisation with the opportunity to give feedback on application processes	61	65
Providing your organisation with the opportunity to give feedback on the annual risk assessment process	65	58
Listening to your organisation's views on better ways to protect student interests	63	58
Implementation and transition to the new Provider Category Standards	N/A	57
Listening to your organisation's views on improving quality assurance (for example, feedback on guidance notes and other regulatory material / information)	56	56
Listening to your organisation's views on ways to reduce regulatory administrative burden	48	42

Q8. How would you rate TEQSA's performance over the last 12 months in terms of....?

Base: 2021 respondents (n=95-118); 2019 respondents (n=92-126).

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



Regulatory approach

Performance of TEQSA's regulatory approach (%) Among those who provided a rating

	Total excellent + good*	
	2019	2021
Helping the sector as a whole to protect students	77	69
Helping the sector as a whole to deliver quality higher education	71	68
Usefulness of the advice and support in relation to the reduction of administrative regulatory burden (including initiatives in response to the commencement of COVID-19 pandemic)	N/A	65
Helping the sector as a whole to manage risks	73	63
Strengthening your organisation's capacity to protect students	67	61
Helping your organisation deliver quality higher education	71	59
Strengthening your organisation's capacity to manage risks	65	55

Q9a. How would you rate TEQSA's regulatory approach over the last 12 months for each of the following items?

Base: 2021 respondents (n=112-122); 2019 respondents (n=127-136).

Significantly **lower** than the 2019 result at the 95% confidence interval.

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



Regulatory activities

Performance of TEQSA's regulatory activities (%) Among those who provided a rating

	Total excellent + good*	
	2019	2021
Treating you with politeness and respect	86	82
Providing opportunities to address matters relevant to a regulatory decision, prior to a final decision being made ^	74	70
Being encouraging without setting up unrealistic expectations	62	70
Being fair and reasonable	74	66
Explaining clearly and constructively why decisions were made ^	65	59
Being consistent and clear about the goal posts for successful decision outcomes ^	58	54
Having an accountable regulatory process where decisions are transparently justified	57	53
Giving timely feedback to save your organisation using its resources on applications that are unlikely to be successful ~ ^	43	43
Minimising the time taken between submitting an application and first receiving a regulatory decision ~ ^	37	40

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

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

~ Indicates the item was reported as part of the 'Applications to TEQSA' section in 2019.

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



Monitoring quality

Performance of TEQSA's monitoring quality (%) Among those who provided a rating

	Total excellent + good*	
	2019	2021
Providing quality feedback on whether your organisation is meeting expected standards ^	60	58
Suggesting networks and resources that your organisation might use to improve performance	41	50
Providing timely feedback on whether your organisation is meeting expected standards ^	42	44

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

Base: 2021 respondents (n=91-92); 2019 respondents (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 made an application.



TEQSA application process

Performance of TEQSA's application process (%) Among those who provided a rating

	Total excellent + good*	
	2019	2021
Clarity of the application guide (easy to understand)	80	73
Usefulness of information about how to prepare an application	74	69
Clarity of the assessment scope and evidence requirements	74	68
Usefulness of feedback from TEQSA about your application	63	55
Timeliness of feedback from TEQSA about your application	N/A	44

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

Base: Respondents who indicated they applied for TEQSA registration, accreditation and/or self-accrediting authority: 2021 (n=60-66); 2019 (n=68-84). **J W S R E S E A R C H**

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



CRICOS application process

Performance of TEQSA's CRICOS application process (%) Among those who provided a rating

	Total excellent + good*	
	2019	2021
Clarity of the application guide (easy to understand)	65	87
Usefulness of information about how to prepare an application	63	79
Clarity of the assessment scope and evidence requirements	71	77
Helpfulness of information on how to use the provider portal (for preparing and submitting applications online)^	75	74
Usefulness of feedback from TEQSA about your application	62	70
Timeliness of feedback from TEQSA about your application	N/A	55

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

Base: Respondents who indicated they applied for CRICOS or renewals: 2021 (n=67-69); 2019 (n=63-73).

Significantly higher than the 2019 result at the 95% confidence interval.

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



Case management

Performance of TEQSA's case management (%) Among those who provided a rating

	Total excellent + good*	
	2019	2021
Usefulness of meetings and/or phone calls with your case manager	N/A	80
Being responsive to your organisation's needs	59	69
Dealing with your organisation efficiently	54	68
Usefulness of health check phone call at the onset of the COVID-19 pandemic	N/A	67
TEQSA's revised approach to case management	N/A	63
Demonstrating an understanding of your organisation's business or operating environment	54	61
Demonstrating an understanding of your organisation's specific needs	55	60
Tailoring an application process to meet your needs ^	N/A	56

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: 2021 respondents (n=66-112); 2019 respondents (n=125-126).

Significantly **higher** than the 2019 result at the 95% confidence interval.

* 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.



Sector risks

Sector risk threat levels (%)

	High threat (%)	
	2019	2021
International border closures	N/A	85
Cyber security	43	76
Prevalence of contract cheating ~	48	52
Student mental and physical wellbeing ~	27	43
Regulatory barriers to innovation	33	40
Online delivery	N/A	28
Integrity of assessment standards (wording in 2021)	N/A	26
<i>Graduating poorly trained students (wording in 2019)</i>	33	N/A
Lack of framework / regulation of micro-credentials ~	5	23
Management of sexual harassment and sexual assault	22	17
Freedom of intellectual inquiry	15	14
Management of bullying	17	13
Student admission processes (wording in 2021)	N/A	11
<i>Admission of underqualified students (wording in 2019)</i>	32	N/A
Cooperation between industry professional accreditation bodies and TEQSA to streamline regulation	17	10
Impact of the new provider category standards	N/A	10
Cooperation between TEQSA and international quality assurance partners (wording in 2021)	N/A	3
<i>Poor co-op'n among national / international profess accreditation bodies, regulators & govt (wording in 2019)</i>	17	N/A

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 2019 survey, in addition to those we are currently aware of, we have selected the following for your comment. What level of threat do you think the following factors pose to the quality of the sector in coming years?

Base: 2021 respondents (n=126); 2019 respondents (n=143).

Significantly higher than the 2019 result at the 95% confidence interval.

~ Indicates the wording of this item has changed slightly since 2019.

THERE ARE 185 TEQSA REGULATED PROVIDERS IN AUSTRALIA...

FIND OUT WHAT THEY'RE THINKING.



Contact us
03 8685 8555



Follow us
[@JWSResearch](#)

John Scales
Founder
jcales@jwsresearch.com

Mark Zuker
Managing Director
mzucker@jwsresearch.com

Katrina Cox
Director of Client Services
kcox@jwsresearch.com

Issued: 1st September 2021



J W S R E S E A R C H