TEQSA 2021 STAKEHOLDER SURVEY FINDINGS AND TEQSA RESPONSE

Overall performance

Findings

- 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 are appreciative of TEQSA's conduct over the past year in a challenging COVID-19 context.
- Performance on most individual key performance indicators (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.
- . For the first time, there are two KPIs in which less than half of providers rate performance as 'excellent' or 'good':
 - o Compliance and monitoring approaches (48% 'excellent' or 'good').
 - o 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').

TEQSA response

TEQSA welcomes the feedback given by providers via this year's stakeholder survey and acknowledges the continued challenges faced by the sector as a result of the COVID-19 pandemic.

The agency is pleased that overall, its performance is rated highly and that communications with the sector during this uncertain time has been well-received. However, TEQSA is also cognisant of the sector's feedback in relation to areas for improvement.

As a Commonwealth regulator, TEQSA is committed to bestpractice regulation and embeds the principles of regulator best practice in all that we do.

TEQSA published its 2021-25 Corporate Plan in late August 2021, which sets out TEQSA's priorities in the current environment. These priorities include: a revised approach to sector risks; addressing threats to academic integrity; evolving TEQSA's compliance monitoring; building on measures taken during the pandemic; and improving TEQSA's timeliness and responsiveness.

Findings	TEQSA response
Communication 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'.	TEQSA notes the feedback provided in relation to communications and will continue to deliver quality information, advice and resources for the sector.
 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. 	TEQSA will continue to review and update application guides to ensure our assessment processes are clear and easy to follow.

Findings	TEQSA response
Timeliness • Timeliness aspects are TEQSA's lowest rated areas: of all metrics evaluated, TEQSA's performance is rated lowest on aspects of timeliness:	TEQSA acknowledges feedback from the sector in relation to timeliness and notes that a continuing priority for the agency will be the timeliness and responsiveness of TEQSA's registration, re-registration and course accreditation processes.
 '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'). 	The quality of TEQSA's compliance and risk assessments will also be a priority, particularly in response to the concerns raised by the sector. TEQSA adopts a multifaceted approach to sector and provider risks and will continue to adjust its approach on an
 'Giving timely feedback to save your organisation using its resources on applications that are unlikely to be successful' (43%). 	annual basis to ensure that it is well aligned with significant provider-level risks.
 'Providing timely feedback on whether your organisation is meeting expected standards' (44%) 	TEQSA is enhancing its risk and compliance monitoring
o 'Timeliness of feedback from TEQSA about your application' (44%).	approaches to ensure its ability to identify emerging risks continues to be strengthened. The Higher Education Integrity Unit is assisting TEQSA in addressing significant sector risk issues.
 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. 	
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.	
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	

Findings	TEQSA response
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%).	TEQSA was pleased with the level of responsiveness from the sector in relation to initiatives that were out for consultation during the 2020-21 period, particularly submissions received following the cost recovery consultation. TEQSA notes that many providers are concerned that they not given sufficient time to respond to TEQSA's requests for information. TEQSA will consider this carefully, including ensuring communication makes it clear that providers can (where appropriate) request additional time to respond to requests from TEQSA. As outlined in the 2021-25 Corporate Plan, the agency will continue to engage with all parts of the sector and will consult with a wide range of stakeholders when reviewing and implementing changes to legislation, instruments, or regulatory policy.
 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. 	TEQSA was pleased that its regulatory activities are considered a strength on a sector-wide basis and that TEQSA staff are polite and respectful in their interactions with providers. Work will continue on improvements to staff learning and development, systems, processes, and improved record keeping.

Findings	TEQSA response
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.	TEQSA notes the feedback provided in relation to monitoring quality and will work to enhance the visibility and communications of quality information, advice and resources available to the sector.

TEQSA response **Findings** Case management point of contact within TEQSA and that proactive 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:
 - o '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%).
 - o Proactive communication with providers from their case managers is an important element of the relationship and is very much valued.
 - o 80% rate the usefulness of meetings and/or phone calls with case managers as either 'excellent' or 'good'.

Considerations and opportunities:

 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.

TEQSA recognises that providers appreciate having a single communication between case managers and providers is highly-valued.

While TEQSA continues to implement a range of strategies to reduce staff turnover, some degree of staff turnover will remain a reality. With a small number of regulated entities TEQSA is keen to build a strong understanding of each provider across the agency. This is being driven by improvements to staff learning and development, IT infrastructure, and improved record keeping.

Where case managers do change, TEQSA endeavours to ensure there is an adequate transition. It is critical that providers feel able to speak openly with their case manager, or any other member of the TEQSA team.

In light of how well-received last year's provider health check program was, planning is now underway to commence the 2021-22 round of meetings in September 2021. It is anticipated that around half of the sector will be contacted by the end of 2021, with the remainder completed in early 2022.

Findings

Sector risks

- 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 measure¹ is a concern for smaller, private providers who feel they will be unfairly disadvantaged.

Considerations and opportunities:

- 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.
- 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.

TEQSA response

TEQSA recognises the continued challenges faced by the sector as a result of the COVID-19 pandemic, including the prolonged international border closures and the impact this is likely to have on Australia maintaining its position as a destination of choice for international students.

As outlined in the <u>2021-25 Corporate Plan</u>, due to continued disruption stemming from the COVID-19 pandemic, TEQSA's approach to risk will remain focused on students and financial viability within the sector. TEQSA will also be closely monitoring other pandemic-related developments, such as changes in models of transnational education.

TEQSA acknowledges the concern within the sector in relation to the cost recovery initiative and notes that the sector's feedback via the cost recovery consultation has been provided to the Minister for consideration.

Initiatives to respond to other sector risks are also being developed, particularly to address to address academic integrity and contract cheating and cyber security.

¹ Note the 2021 Stakeholder Survey was in field from 31 May – 18 June 2021, during which TEQSA was seeking also feedback from the sector in relation to the cost recovery initiative.