

6 April 2011

Mr Tim Watling
Committee Secretary
Standing Committee on Education, Employment and Workplace Relations
PO Box 6100
Parliament House
Canberra ACT 2600

Dear Mr Watling,

I wish to thank you for your invitation to make a submission to the Inquiry into the Tertiary Education Quality and Standards Agency Bill 2011.

The Australian College of Theology has been a national provider of theological higher education since its foundation in 1891. The College was granted self-accrediting authority in July 2010 by the NSW Department of Education and Training. This authority has been recognised by all mainland states and is acknowledged on the Australian Qualifications Framework Register.

According to Section 16-25 (3) of the Higher Education Support Act 2003 an institution that is empowered to issue its own qualifications is defined as a self-accrediting provider. We have sought to be listed on Table B of the HESA 2003 on the reasonable assumption that that Table contains self-accrediting institutions. With listing on Table B, institutions are currently eligible to apply for research funding under the Research Training Fund (RTF) scheme.

In a question to Mr Ian Hawke, interim CEO of TEQSA, at a public forum in Sydney on Monday 21 March, it appears that he is of the opinion that only institutions with the title "university" will be able to access RTF moneys once TEQSA becomes operative. We submit that care should be taken lest the TEQSA legislation restrict access to research funding only to institutions with a university title. It would be more equitable if eligibility for funding were to be made dependent on whether an institution, university or non university, was authorised to provide a higher degree by research.

In addition I note that TEQSA will apportion a risk rating to all higher education providers. We understand that universities will be given the lowest risk rating and that non university providers will be apportioned a rating that depends in part on their length of operation. We submit that the length of time a non university provider has operated in full compliance with the National Protocols and the requirements of the state and territory accreditation agencies be taken into account. In the case of the Australian College of Theology, we have been self-accrediting since July 2010 only, but have operated since 1891 and in compliance with state higher education regulators, commencing in NSW, since 1975.

Yours sincerely,

Mark Harding
Dean & CEO

govt/teqsa/watling