



## **Flinders University**

### **Submission to Senate Education and Employment Legislation Committee Inquiry into the provisions of the Tertiary Education Quality and Standards Agency Amendment Bill 2014**

Flinders welcomes the opportunity to comment on the draft Tertiary Education Quality and Standards Agency Amendment Bill 2014.

Flinders was one of the universities required, in 2012, to submit a re-registration application to TEQSA. While the work required was substantial, it was not, in my view, onerous, and it had considerable side-benefits in benchmarking the University's quality assurance processes. All institutions should have sound governance, management and QA regimes in place and the TEQSA re-registration process drew primarily on the University's existing QA processes and information.

Higher Education providers wishing to accept international students are also obliged to undertake a separate CRICOS registration process under the ESOS Act. For as long as two separate Acts exist, two registration processes must exist and TEQSA is currently obliged to administer both of them. TEQSA is able to simplify a provider's CRICOS registration process by drawing on the material supplied in the institutional registration application, thus making the process as painless as possible for the provider. The fact that both acts are administered by one agency potentially makes things simpler for higher education institutions.

Flinders University maintains a positive and cooperative relationship with TEQSA and appreciates the support TEQSA has provided in assisting the University to meet the requirements of the various Acts governing higher education provision. The rationalisation of that legislation itself should be a priority. Flinders supports TEQSA's process of streamlining re-registration and exploring the consolidation of national regulatory requirements. The University also supports the provisions in the Bill to streamline TEQSA's internal management and operations, provided that such streamlining does not diminish TEQSA's authority or functioning as a regulator.

TEQSA has recently streamlined its risk assessment process (its Regulatory Risk Framework) which it undertakes annually using data routinely supplied to the Commonwealth. Operationally, TEQSA must ensure that it is aware of any problems that arise so that it can address them promptly and effectively, thus requiring an ongoing monitoring process as well as a periodic evaluation process. Such routine monitoring should enable TEQSA to assure itself of the performance of institutions, on the basis of which the period of institutional registration should be able to be extended. The University would support the view that registration should be able to be extended on the basis of adequate performance as indicated under the RRF.

The University notes the proposal to separate regulation from quality assessment, and broadly supports this step, provided that there will be adequate quality monitoring and control in place. If the Higher Education sector is to maintain and develop its national and

international reputation, it must be able to demonstrate publicly the quality of its programs and operations with reference to independently determined, national parameters as well as institution-specific quality parameters and strategic plans.

Flinders does not consider that its role as a university is being constrained by a one-size-fits-all approach to standards (the Threshold Standards). It is clear that TEQSA is ensuring that all providers can show they are functioning in a manner commensurate with their charter and a transparent set of standards. Flinders notes the draft revised Threshold Standards recently circulated by the Higher Education Standards Panel (to which it intends to respond) and looks forward to the implementation of a streamlined approach to Higher Education regulation.

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