

Ref: N4.11.7 – 23 October 2020

Sen. Hon. James McGrath
Chair, Senate Standing Committee of Education & Employment
Department of the Senate
PO Box 6100 – The Senate
Parliament House
CANBERRA ACT 2600

Dear Senator

RE: Higher Education Legislation Amendment (Provider Category Standards and Other Measures) Bill 2020

The Independent Tertiary Education Council Australia (ITECA) is the peak body representing independent providers in the higher education, vocational education, training and skills sectors. In the higher education sector, independent providers deliver to approximately eight per cent of all domestic higher education students and approximately fifteen per cent of all overseas students studying a higher education qualification in Australia.

While independent providers do not represent the largest or most vocal cohort of providers in the tertiary education sector, independent providers fulfil a critical role, responding to student and employer demand; one that is often left vacated by large public institutions.

The significance of the reform that can be facilitated in Australian higher education through a transformation in the Provider Category Standards should not be underestimated. The Review undertaken by Emeritus Professor Peter Coaldrake AO was comprehensive, and ITECA has previously and publicly welcomed the Government's response to it.

The Review of the Category Standards made detailed recommendations to amend the Provider Category Standards, including proposing to reduce the current six categories to four and to significantly revise the provider category descriptions. The Review also proposed revision and simplification of the criteria for seeking self-accrediting authority.

Broadly speaking, the *Higher Education Legislation Amendment (Provider Category Standards and Other Measures) Bill 2020* (the Bill) before the Committee is facilitative. That is, it facilitates the outcomes sought through the Government's response to the Review of the Provider Category Standards and the subsequent consultation by the Higher Education Standards Panel.

The Bill will also give effect to the single outstanding recommendation from the 2016-17 Review of the Impact of the Tertiary Education Quality and Standards Agency Act (TEQSA Act; the Impact Review). This is certainly welcome, and it will enable the simple step of referring to the Threshold Standards as a single framework.

There are a number of other minor additional amendments that the Bill will achieve, and its passage is supported by independent higher education providers.

The Standards themselves and the instruments that sit alongside the legislation, for example the capacity for TEQSA to determine the value or quality of research, are issues that would benefit from deeper consultation with the sector.

Yours faithfully

Troy Williams FIML MAICD
Chief Executive