



Australian Universities Quality Agency

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14 April 2011

Mr Tim Watling
Secretary
Senate Standing Legislation Committee on Education, Employment and Workplace
Relations
Parliament House
CANBERRA ACT 2600

Dear Mr Watling

TEQSA Bill

It has frequently been stated, in documents from DEEWR and from the TEQSA Transition Team, that the AUQA audit cycle 2 will continue to its conclusion at the end of 2012. To achieve this, the self-accrediting institutions (SAIs) scheduled for audit by AUQA in 2012 are listed as being registered to 31 December 2012 (section 2(3), p29), while the others are listed as being registered to seven years after their last AUQA audit. However, once we reach February 2012 (assuming that this is seven months after the start of TEQSA), and there is no HESA audit requirement, the institutions in the 2012 list will be governed by the TEQSA registration requirements.

We turn therefore to section 35 of the TEQSA Bill, and find that a provider is to apply for renewal of registration 180 days before the end of its registration period. This means (unless there is another provision elsewhere that I have missed) that none of the institutions in the 2012 list needs to be audited. Instead, they can apply mid-2012 to be registered against the provider standards.

I do note that section 30 (p49) of the Consequential Amendments Bill **allows** TEQSA to complete AUQA's planned 2011 and 2012 audits, but there are two problems. The first is that this is only 'for the purposes of the HESA 2003' – and as already observed, by then HESA will not require audit. The second is that it only **permits** TEQSA to complete these audits ('may') – the completion is not required

In summary, despite repeated public statements about the completion of AUQA's second audit cycle, this is not built into the current provisions. I have discussed this with Mr Ian Hawke, Interim CEO of TEQSA, and he assures me that the appointed TEQSA Commissioners will act so as to ensure this occurs. In my view, it would be better not to await the decisions of someone who is yet to be appointed.

Furthermore, audits of NSAs will no longer be required by legislation from seven months after the start of TEQSA, ie, on current prognoses, February 2012. However, AUQA has long been discussing with NSAs, on behalf of DEEWR, audits in 2012. It

would therefore be consistent, and less disruptive, to provide for NSAI audits to continue as planned to the end of 2012 also.

I therefore suggest that in section 30 of the consequential amendments, the statement "for the purposes of HESA 2003, TEQSA may carry out audits scheduled by AUQA for 2011 or 2012" be changed to "TEQSA will carry out audits scheduled by AUQA for 2011 or 2012". This will mean that 1. The work currently being done by AUQA, the institutions and others for 2012 is not irrelevant; 2. Continuity of the current system into the new one is assured; and 3. The movement of AUQA staff into TEQSA is endorsed.

Please note that I have not had the opportunity to discuss this with the Board of AUQA, so my comments should be treated as being from an individual.

Yours sincerely

Dr David Woodhouse
Executive Director