

12 April 2011

Mr Tim Watling
Committee Secretary
Senate Education, Employment and Workplace Relations Committees
PO Box 6100
Parliament House
CANBERRA ACT 2600

Dear Mr Watling,

Thank you for the invitation to make a written submission on the TEQSA legislation to the Senate Standing Committee on Education, Employment and Workplace Relations.

The University of Western Sydney (UWS) considers there to be two broad categories under consideration: the TEQSA legislation itself and the Provider Standards that support the legislation.

Response To The Draft Legislation

With respect to the legislation, the first consideration relates to the self-accrediting status of universities. UWS supports the view of Universities Australia that provisions relating to self-accreditation would be best placed within the body of the legislation as well as in any subordinate or supporting documents such as the Provider Standards. The operation of the Provider Standards is itself dependent on the other Standards, some of which have yet to be developed. To facilitate a stable legislative and operational platform it is best to recognise the self-accrediting status of universities in explicit terms within the TEQSA legislation.

Further, it is our view that the legislation is currently vague in some aspects of its terminology. In particular, it is not always clear if the term 'higher education provider' includes or excludes universities. If it includes them, then the section on self-accreditation (which operates on a course-by-course basis) would appear to undermine the meaning of self-accreditation in a university context. If it excludes them then various sections of the legislation become hard to interpret, as the phrase appears to be used so as to include universities. Moreover, in the section on definitions (section 5), 'higher education provider' would appear to include universities where it refers to either a 'constitutional corporation' or a 'corporation established by Commonwealth law' that 'offers or confers a regulated higher education award.' If this were the case, UWS would have serious reservations about the operation of the section on self-accreditation.

UWS recommendations

1. That the TEQSA legislation recognise the self-accrediting status of universities in explicit terms
2. That the definition of "higher education provider" be clarified and consistently used, provided that it also makes clear that universities are self-accrediting

Response To the Provider Standards

With respect to the Provider Standards, there are four important elements for consideration:

The first is that in defining Provider categories, the Standard clearly identifies the relationship between research quality and output and which title to use. UWS takes the view that in addition to teaching and research, community engagement is an important part of a university's social contribution and corporate life and it is therefore an important element in the use of the title.

Secondly, the relationships between the Course Accreditation Standards (for non-self-accrediting providers), the standard for self-accreditation and the 'Qualification Standards' are unclear. The value of the standards outlined in the consultation document will depend on what is in the Qualification Standards, since it frequently refers to them. Without being able to review the Qualification Standards it is difficult to endorse the Provider Standards.


Thirdly, the quality framework for course accreditation should be clearer. For example, within UWS's framework, the intended impact of the course must be stated and supported by explicit learning outcomes, which then become the basis for course design, support and delivery. This provides a mechanism for interpreting what, for example, 'appropriate' course design means. Within the Provider Standards 'appropriate' course design is mentioned but there is no clear way to identify that means. A framework that measures course design against its learning objectives might be useful, as would explicit reference to continuous improvement and a clear expectation that courses offered by non-self-accrediting institutions will be held to the same standard as courses offered by self-accrediting institutions so as to ensure maximal equivalence.

Finally, the application of the standards to offshore partnerships needs to be strengthened to ensure that all possibilities are accounted for.

UWS recommendations

1. That the Provider Standards be amended to include community engagement as an integral part of being a university
2. That the Qualification Standards be issued for consultation and the Provider Standards reference to the Qualification Standards not be included until the Qualification Standards have been generally supported by the sector.
3. That the Provider Standards include a robust quality framework for course accreditation
4. That the Provider Standards requirements related to the quality framework explicitly state that the same standards will be applied to both universities and to non-self accrediting providers
5. That the Provider Standards be strengthened to ensure they apply to the full range of offshore partnerships in the provision of higher education.

Yours sincerely,

 Professor Janice Reid
Vice-Chancellor