



Students' Representative Council
The University of Sydney

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To the Senate Standing Committee on Education and Employment.

I write on behalf of the Students' Representative Council of the University of Sydney. The SRC is the democratically elected representative body for over 33,000 undergraduate students at the University of Sydney.

We welcome the opportunity to provide this short submission on the Tertiary Education Quality and Agency (TEQSA) Amendment Bill 2014.

We believe that TEQSA has an important role in protecting the quality of education provision across the entire Higher Education sector.

Yours Sincerely

Jennifer Light

President
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Context/ Environment.

Ongoing and systemic assessment of the quality of education for students is important for a system facing an environment that includes:

- Announced cuts in Commonwealth funding of 2% or \$2.3B, leaving universities with less money to meet the needs of students. This is compounded by the failure to act on reforms recommended by the Bradley Review; to review costs and update discipline funding, and to index per capita funding of student places.
- Recent proposals in the Kemp- Norton Review of Demand Driven Funding in support of Commonwealth Supported Places for the private higher education sector. This potentially dilutes funding across the sector. It leads to public funding going to private providers with less established quality assurance mechanisms and who are necessarily driven by profit maximization over other considerations.
- The on-going 'demand driven' deregulation and expansion of undergraduate Commonwealth supported student places by under-resourced universities. This puts pressure on quality in the system as universities are pushed to the limits of their human and capital resources dealing with additional numbers of students.
- Limited existing mechanisms for handling risk to the system's reputation for the quality of its provision. Even where reputation is not immediately damaged, there exists an incentive for all providers to protect their 'brand' in the short-term rather than develop actual quality long-term.
- An existing and continuing funding and cultural bias in the system (for research universities) that rewards research performance rather than teaching; and which rewards global status (driven by methodologically unsound league tables) rather than performance in education across the range of disciplines.
- High fees but little protection for students. The levels and proportion of local and International student funding of the system is already significant by world standards. Recent proposals by the Commission of Audit suggest increased proportions of funding of higher education by local students. But this will not improve quality. Higher education is not and cannot be a pure market, and students have little real market or consumer power and limited democratic voice.
- The on-going spread of corporate management models in public universities at the expense of their mission to produce public goods such as a broadly educated population in a democratic society.

Quality Assessment and Assurance

The SRC recommends the retention of Section 60 of the Tertiary Education Quality and Standards Agency Act to allow TEQSA a continuing role in quality assessment and assurance.

The Bill proposes the removal of this role but offers no systematic alternative ongoing mechanism to review and protect the quality of education for students. It would leave only the unlikely threat of the removal of accreditation for courses. The Minister's Second Reading Speech offers little reassurance and no plan - "Broader issues around quality in higher education and risks to quality are better supported through the constructive engagement with and initiatives of institutions themselves."

The Bill's Explanatory Memorandum puts significant trust in current internal mechanisms and suggests a completely de-regulatory approach - "...it would be more effective to allow providers to manage their own quality assurance.."

Thematic reviews or the potentially more valuable discipline level reviews are to be discarded.

There appears to not even to be a residual model of quality 'assurance' such as that performed by the Australian Universities Quality Agency (AUQA) before it was replaced by TEQSA. This leaves little accountability for universities to demonstrate to Government and students that they even have their own mechanisms or initiatives in place to assure quality even by their own determined standards or missions.

Minister's Directions to TESQA

The SRC recommends against the increased scope for the Minister to give direction to the TESQA proposed in the amendment to Section 136(1) of the Act.

The proposal expands the power of the Minister and removes the independence of the Agency. The scope of the amendment is broad allowing direction "in relation to the performance of its functions and the exercise of its powers". There is little rationale for the proposal. These directions would not be subject to review by the Parliament. The dangers of the politicization of the TEQSA's work are increased and the possibility of abuse exists.

Students and Stakeholder Representation

The SRC recommends that students through their representative bodies as the key stakeholder on issues of quality be given a bigger role within TEQSA, though greater recognition and representation on TEQSA Standards Panels.