

## **IRU response: TEQSA's proposed External Reporting program**

The IRU supports the intention of the Tertiary Education Quality and Standards Agency (TEQSA) to use its data sets to provide:

- better information about its actions; and
- evidence of broad trends about how higher education providers are achieving or not quality outcomes.

Done well, it will:

- assist universities understand where they stand against other universities and providers, making any adjustments considered useful; and
- provide an insight to TEQSA's thinking and assumptions.

It is essential that the release of information by TEQSA is designed to improve understanding of quality strengths and potential weaknesses across providers while avoiding creating unfounded concerns or targeting any individual provider. Issues with individual providers should be addressed through TEQSA's formal regulatory activity in response to any concerns about achievement of standards by a provider.

The consultation paper proposes five kinds of information for release.

### **1. Data on the outcomes of TEQSA assessments**

This covers base information about how many providers in a period received each of the main outcomes possible from rejected to approved, with providers grouped into University, non University for Profit, and Non university not for profit.

Such data will provide broad indications of the shape of high education, with the provider groupings allowing any differences to be evident. It summarising information that should be available provider by provider as decisions are made.

### **2. TEQSA analysis of compliance with the standards considering causes for problems and the approaches taken to show compliance**

This is necessarily more judgmental than the raw data on decisions made and hence will need to be effectively presented. In addition to its explicit purpose of revealing more about higher education delivery it will provide an insight into TEQSA's own thinking and assumptions, making it more accountable.

That is, such info could say as much about TEQSA as about higher education providers.

### **3. Using the TEQSA Risk Assessment Framework to report areas most subject to at-risk assessments**

Having this information public allows providers to understand TEQSA's areas of focus and to consider their standing against the sector as a whole.

The risk framework is not the Higher Education Standards. The paper acknowledges there is a step between TEQSA identifying a potential risk and establishing that there is indeed a problem such that the set of real problem areas is smaller than the set of at risk assessments, and not fully overlapping.

The risk is that the raw set of 'at-risk' areas and volume will become the headline. The reporting should make clear the extent to which risks identified are confirmed as problems or not, and to the

extent it is so that identified risk areas are addressed by providers. Exemplars of of good and poor practice and some insights into how TEQSA interprets standards would be helpful.

TEQSA should also be careful to remain descriptive about provider characteristics (for example as a medium risk) not allowing those descriptions to become de facto typologies which providers ought to fit.

#### **4. Reporting on how providers respond to TEQSA**

It is not clear that information about how higher education providers interact with TEQSA adds to public accountability.

There are various requirements of the TEQSA Act for providers to assist TEQSA in its work. It is possible some providers may be particularly laggard in meeting these requirements, potentially hampering TEQSA's capacity to be effective. This should be dealt with through formal actions with that provider, which should ultimately be part of the public record.

Too much emphasis on the requirements to be compliant to TEQSA as a body rather than to the Standards risks undermining provider capability to challenge TEQSA about its assumptions and actions, ensuring constructive tension in the development of what constitutes good quality higher education.

Ultimately there is no argument to suppress such information but no clear gain from making it part of a regular reporting regime.

#### **5. Issues specific reporting**

TEQSA should be wary of looking to do too much in this regard while accepting that there may be moments when a thoughtful TEQSA analysis would be of value.

The experience of the initial years for TEQSA is that we should be wary of its powers to analyse and comment on potential major issues. The proposal in the paper emphasises the analysis of information already collected. The previous efforts in this direction were undermined by heavy handed data requests for audit standard data rather than useful information.

31 August 2016