TDA Response: Future directions for TEQSA’s Regulatory Processes

Sector Discussion paper

Consultation Question A1

Do you agree with TEQSA’s proposal for reforming renewal of registration processes? If not, why, and what would you propose instead?

Response

TAFE Directors Australia (TDA) agrees with the proposal to reform the renewal of registration process to reduce the amount of evidence and information required at the time of application. In particular, the HEP Network supports organisational policies and procedures submitted in earlier applications for course renewal of accreditation and new course accreditations being stored in the central repository.

We also seek, on behalf on the members of our TAFE Higher Education Provider Network, further clarification of the reforms suggested in the discussion paper.

Consultation Question A2

Are the proposed course evidence requirements as listed in Attachment A appropriate? If not, why, and what would you propose instead?

Response

TDA agree that the requirements outlined in Attachment A are appropriate but propose that TEQSA consider a further reduction on documentation if a provider has submitted a course renewal for accreditation or a new course accreditation application in the past 12 months.

In addition, TDA proposes that a ‘Low-Risk Category’ be created to reduce the regulatory requirements for institutions which have consistently demonstrated good performance in their Regulatory Risk Framework and in previous accreditation/re-accreditation submissions. This strategy would support TEQSA in adopting a more resource-efficient and targeted approach to the re-registration process. This is especially relevant for TAFE Institutes which operate under state or territory governance, and already have undergone rigorous prior audits.
Consultation Question B1

Do you agree with TEQSA’s proposal for reforming course accreditation processes? If not, why, and what would you propose instead?

Response

TDA agrees with the proposal to reform the course accreditation process; however the proposed reforms do not clearly demonstrate the changes mentioned in the discussion paper. Only relatively minor changes have been suggested to course accreditation documentation as indicated in TEQSA Attachment B. The primary change appears to be that institution policies and procedures will be stored in TEQSA files and therefore no longer required as an inclusion in accreditation applications.

TDA proposes that TEQSA consider a reduction in the burden of evidence collection for the accreditation of new degrees by Low-Risk Higher Education Providers who have proven, through a succession of accreditations/re-accreditations to be secure, well governed organisations.

In addition a specific commitment by TEQSA to a much shorter timeframe for course accreditation than the maximum provided for in the Tertiary Education Quality and Standards Agency Act 2011 is requested.

Consultation Question B2

Are the proposed core evidence requirements as listed at Attachment B appropriate? If not, why, and what would you propose instead?

Response

TDA agrees that the core evidence list in Attachment B is appropriate but argues that the list continues to provide scope for repetition with accreditation and re-accreditation documentation.

Consultation Question C1 & C2

Do you agree with TEQSA’s proposals for reforming renewal of course accreditation processes? If not, why, and what would you propose instead?

Response

TDA appreciates the proposed changes proposed by TEQSA for the renewal of course accreditation. The recognition of the ongoing success of a course/ institution and reduction in core evidence requirements based on the provider’s risk profile is an important change that could greatly reduce the documentation burden inherent in the current process.
For further information:

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