

A National Quality Strategy for Australian Transnational Education and Training

TDA Response to the DEST Discussion Paper

TAFE Directors Australia (TDA) welcomes the opportunity to submit comments on the issues raised in the paper *A National Quality Strategy for Australian Transnational Education and Training*.

TDA is a national association representing TAFE Institutes and the TAFE Divisions of multi-sector institutions, with its members being the CEOs of those bodies. As such, TDA is the peak body for the TAFE sector and represents public providers of vocational education and training.

The views expressed in this submission reflect the outcome of consultations with our Members, a significant number of whom are engaged in offshore delivery. We are aware that some of our member Institutes have independently made submissions to you on the Discussion Paper and will have commented in some detail on the issues raised in the Discussion Paper.

General Comment

TDA recognises the importance of having arrangements in place that promote the international recognition of Australia as a provider of high quality education and training services. As far as the TAFE sector is concerned, TAFE providers strive to apply the standards of the Australian Quality Training Framework to offshore programs as they do to onshore programs and to achieve similar high quality outcomes. Many TAFE Institutes also have ISO accredited status. We are not aware of any concerns being expressed by clients about the quality of TAFE delivered programs offshore.

We are, however, conscious that Australia's reputation as an education and training provider can be impaired by the actions of those who do not apply recognised standards. Accordingly, we agree that there is scope for improving existing arrangements with the aim of achieving wider observance of quality principles by those operating offshore. That said, we are strongly of the view that the development of a national strategy needs to take due account of existing arrangements, the importance of consistency of approach between onshore and offshore regulation, the need to avoid excessive compliance costs, and the constraints imposed by differences between onshore and offshore markets.

We have commented below on the specific matters raised in the Discussion Paper.

Definition

The definition of transnational education includes all relevant organisations and off-shore delivery arrangements. However, there is insufficient recognition in the paper that different quality issues arise for different modes of delivery and that different approaches

may be required to deal with these. Delivery by an offshore campus of an Australian institution will, for example, be more amenable to regulation than programs offered through a local partner.

More generally, there is insufficient recognition that Australian providers operating offshore are operating in a market the nature of which limits the extent to which Australian quality controls or approaches may be relevant or can effectively be applied and enforced.

The environment is one where local requirements, practices and culture may be very different from those in Australia. Typically also it is a highly competitive market with many international players. While it is important for both political and commercial reasons to have a sound QA approach, care needs to be taken to ensure that it takes into account local circumstances and that the costs are not such as to put Australian providers at a commercial disadvantage.

Principles

The principles set out in the paper are at a general level appropriate and indeed they underpin current arrangements at least in the VET sector.

However, given the differences in the quality assurance systems applying in each of the Australian education sectors and given that education and training systems in other countries are structured differently to Australia's, it will inevitably be difficult to avoid misunderstanding and confusion among international students and other governments.

This raises two fundamental issues. Firstly, whether it is in Australia's interest to continue to maintain for export purposes the sectoral distinctions reflected in the AQF when they may not be well suited to other countries' circumstances; and secondly, whether it is appropriate to insist on all elements of each sector's quality systems being applied, rather than identifying and applying common elements which may be able to be drawn together in an approach which would give meaningful assurances of quality to overseas clients. We recommend that further consideration be given to these matters.

If the current sectorally based approach is to continue, we would make the following points about the principles as they apply to the VET sector.

- The AQTF standards are clear and providers can be audited against them. There would, however, be benefit in reviewing the standards and modifying them as necessary to cater more appropriately for the off shore program environment.
- Clarity about the requirements for offshore partners and accountabilities can be achieved by being specified in agreements between providers and their offshore partners.
- Under the AQTF, accreditation and audit functions are transparent and clear.
- The Framework offers standards and processes to help ensure equivalence between offshore and onshore programs.

Strengthening Promotion and Communication

TDA agrees that it is important that Australian quality standards and processes be clearly communicated and that there is scope for improving access to information.

We see value in a ‘one stop shop’ information point; this might include

- Information on quality assurance standards that apply to the various education sectors;
- A list of Australian providers who are recognised as having the appropriate systems in place for the achievement of AQTF compliance offshore; and
- Information about where Australian qualifications fit with host countries’ qualifications frameworks.

Consideration might also be given to the feasibility of supplementing the list of Australian providers with a list of those who have a demonstrated record of responsible provision of award courses offshore.

We have reservations about the appropriateness of including a comprehensive list of accredited offshore programs because some of this information would be regarded by providers as commercial in confidence.

Strengthening the Quality Framework

Of the three models suggested, TDA generally prefers Model 1: the Augmented Current Model.

The VET sector already has quality assurance arrangements in place, with the States and Territories having responsibility for registration and audit of providers and accreditation of courses. The augmented model would allow scope for any necessary refinement. It would also have the benefit of allowing providers to build upon the systems that have been developed and implemented over recent years. While State/Territory bodies continue to have responsibility for registration and audit, they should also have the responsibility for addressing complaints about offshore operations

TDA is aware that there are issues of consistency among the States/Territories in their approach to quality assurance and also in the extent to which they currently audit offshore operations.

In principle, TDA strongly favours a national approach to quality assurance. In our comments on DEST’s Discussion Paper, *Skilling Australia – New Directions for Vocational Education and Training*, TDA argued that a national approach to quality assurance and a national quality agency are fundamental to a national system. At the same time, we noted the limited role that is being suggested for the National VET Quality Agency initially and said that we hoped that its role would be extended and possibly replace State processes in the future. While we see great merit in a national approach, we are also strongly of the view that responsibility for offshore functions should rest with the

same body or bodies as the responsibility for onshore functions. We see no case at all for separating these functions and setting up a National Authority specifically for offshore.

We see some value in setting up an Advisory Board to advise on best practice and processes to improve national consistency. We are conscious, however, of the limitations pointed to in paragraph 5.15. Given its advisory role, and the aim of stimulating action that will strengthen Australia's quality system, our preference would be to see the Advisory Board set up as a small body with functions limited to its main task, and for it to be comprised of experts rather than being a body that is representative of the many interest groups involved. By experts, we mean people who have in-depth knowledge and direct experience of issues related to offshore delivery; we would expect most of those experts to be drawn from provider bodies who are actively engaged in offshore delivery.

As noted in the Discussion Paper, an important role for the Advisory Board would be to analyse good practice with a view to establishing protocols and principles to complement existing arrangements. There should be a particular focus on developing an integrated cross sectoral approach to offshore quality which has regard to the need to avoid imposing compliance costs on providers that would make them uncompetitive in international markets.

We strongly support the concept of encouraging self-review and assessment in the five year period between audits, and also of encouraging dialogue among providers. Initiatives in this direction would be welcome. We note that DEST has provided significant funding to universities to develop and share good practice and consider that the provision of similar assistance to the VET sector is overdue.

We do not consider that a quality assurance process needs to be put in place for non-award VET courses, but there is benefit in establishing a set of operating standards.

The paper raises the question whether a quality assurance framework should be established with respect to offshore delivery for ELICOS. We support the development of a framework for ELICOS courses.

Conclusions

TDA favours a national approach to quality assurance and in principle considers that this would be best done through the establishment of a national body. However TDA is also strongly of the view that it would be highly undesirable to separate responsibilities for onshore and offshore delivery given the additional compliance burden that would ensue. There should be an integrated approach to quality assurance.

If the States and Territories are to continue to have responsibility for quality assurance, there are several ways in which the existing system can be improved. First, the States and Territories can utilise their powers more effectively to strengthen quality assurance for offshore delivery in the VET sector. It would also be appropriate to look at modifying

the application of existing AQTF provisions to offshore delivery to take into account the different circumstances and environments of offshore markets.

Further, there are steps that can be taken to complement and promote Australian quality assurance systems by providing better information to potential clients. We support proposals to provide this information through a one stop shop which would appropriately be run by the Australian Government. The Australian Government should also be providing support to highlight and promote good practice and encourage greater dialogue about QA among providers in the VET sector, just as it is doing for universities.

In addition, there may be value in establishing an Advisory Board composed of experts to advise on best practice and develop principles and protocols to complement existing arrangements, including the possible development of an integrated cross sectoral approach to quality assurance for offshore delivery, as well as on processes to improve national consistency.

TAFE Directors Australia
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