



INDEPENDENT
HIGHER EDUCATION
AUSTRALIA

IHEA SUBMISSION

AUSTRALIAN UNIVERSITIES ACCORD INTERIM REPORT

TERTIARY EDUCATION COMMISSION

13 October 2023

IHEA Submission

Australian Universities Accord Interim Report

Tertiary Education Commission

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Independent Higher Education Australia (IHEA) makes this proposal as a resource for the Australian Universities Accord Panel and Minister Clare's deliberation on the establishment of a Tertiary Education Commission (TEC) as per section 3.1.4 of the Australian Universities Accord Interim Report.

We present this submission not as an outright endorsement or recommendation, but as a potential blueprint should the panel decide to proceed with the TEC's creation. We assert that the mere establishment of a TEC will not lead to reform; instead, it is essential for any newly formed TEC to be imbued with a reform-minded approach from its inception. This document aims to enrich the panel's work, offering alternatives to avoid the creation of a TEC that might merely duplicate existing bureaucratic processes or postpone necessary reforms. Our submission will explore three critical areas for consideration:

- The purpose of the TEC.
- The composition of the TEC.
- The relationship of the TEC with existing bodies.

IHEA representatives would be available to meet with the Minister and Panel to discuss this submission.

IHEA Recommendations

1. The TEC should be established with an explicit commitment to a 'Student-Centred' approach. This means prioritising students' educational journey, aspirations, and needs in all decision-making processes.
2. If the TEC is to be established, it should be done so immediately, with initial responsibility for a) delivery of the Universities Accord final recommendations and b) long-term strategic planning to create a more coherent national system.
3. Plan (3 – 5 years) for the TEC to take responsibility for VET and to oversee ASQA, to create an integrated, streamlined tertiary education system that is seamless for students, providers, accrediting bodies, and employers.
4. Be designed to promote excellence, innovation, and flexibility, to foster an environment that prioritises quality and growth across the whole tertiary education sector, and inclusive of all tertiary providers.
5. Be responsible for mission-based compacts and consider introducing mission-based funding to drive innovation and diversity across all tertiary institutions, and inclusive of all tertiary providers.
6. Ensure the membership of the TEC is expert-led, possessing extensive experience and knowledge in identifying and implementing strategies that enhance outcomes for students in tertiary education.
7. Ensure the TEC prioritises transparent operations and provides a comprehensive and public-oriented report on an annual basis.
8. Ensure the membership of the TEC represents the present and future diversity of the tertiary

education sector and its beneficiaries, an equity commissioner, and a person with deep experience of the independent sector.

9. Include representatives of TEQSA, ASQA, the ARC (and potentially NHMRC), and Jobs and Skills Australia in its membership or with a right of attendance at its meetings.
10. Consider a mix of full-time and part-time commissioners for a dynamic and adaptable structure and to promote continuity of knowledge across time.
11. Disband the TEQSA Commission and include the CEO of TEQSA as a member of the TEC.
12. Reconstitute the Higher Education Standards Panel (HESP) as a committee of the TEC.
13. Establish a Learning and Teaching Centre of Excellence that is accountable to the TEC to drive continuous innovation and improvement in educational outcomes and pedagogical practices.
14. Through the TEC, ensure the relationship between the Commonwealth Government and the tertiary education sector is a dynamic, evidence-driven partnership.

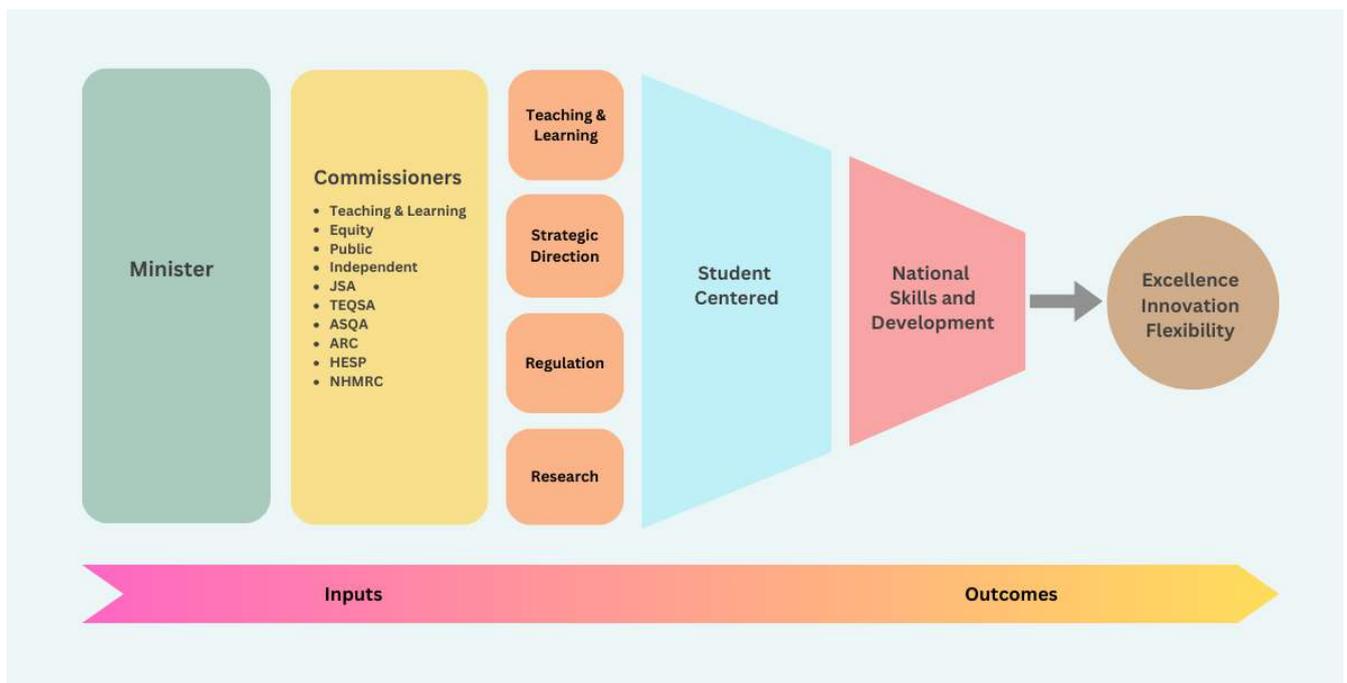


Image 1: Potential Blueprint for Tertiary Education Commission (TEC)

A. Purpose of Commission (Recommendations 1-5)

The TEC must fundamentally adopt a 'Student-Centred' approach in all its endeavours. The student should be placed at the epicentre of the Commission's work, with their educational journey, aspirations, and needs shaping the strategic direction and focus of the Commission. This means that every strategy, decision, and innovation must first and foremost consider its impact and potential benefit to the student body. The purpose of tertiary education is to enrich and empower students to reach their full potential, and this must be the guiding principle for the Commission. The most effective way to ensure the quality and growth of the sector is by consistently prioritising the needs and interests of students. This requires not just a shift in perspective, but an ongoing commitment to dialogue and engagement with students.

The Commission should be primarily focussed on long-term strategic thinking. This involves predicting and

managing future trends, challenges, and opportunities with a keen focus on the evolution of higher education. It should ensure that Australia is on the cutting edge of global education trends, while maintaining a steadfast commitment to the quality of its tertiary sector.

The Commission's remit should encompass the coordination and national coherence of both the architecture and funding of higher education. This involves creating an effective national strategy and fostering cooperation among different stakeholders. The Commission should be a strategic body focused on harmonising vocational and higher education, while also guiding the management of resources in a way that promotes the growth and quality of the sector.

The Commission's focus should be on three key pillars: Excellence, Innovation, and Flexibility. As a strategic body, the Commission should prioritise the quality and growth of the sector, fostering an environment that encourages innovation and diversity among institutions. This includes expanding the scope of mission-based compacts and possibly introducing mission-based funding.

Innovation should also be embraced within the Commission's vision, stepping away from the traditional bricks and mortar university model. The Commission should create an environment that is diverse and fluid, without losing any aspect of the teaching, learning, and research excellence that typifies Australian higher education. This involves embracing new modes of delivery and encouraging the use of technology to enhance teaching and learning outcomes.

B. Composition of the Commission (Recommendations 6-9)

In the context of the ongoing Australian Universities Accord process, the TEC stands as a pivotal body poised to shape the future of higher education in Australia. With its primary focus on strategic thinking, coordination and national coherence, and leadership, the TEC's composition is critical for its ability to fulfill its mission. This section aims to expand on the proposed composition of the Commission, ensuring it includes key stakeholders and possesses the requisite expertise.

The Commission should be independent and expert-driven, comprised of knowledgeable individuals with a deep understanding of the needs of the higher education sector. The leadership team should be tasked with making informed decisions that are both progressive and evidence based.

It is important to state that the Commission cannot merely create another level of bureaucracy, it must add value in and of itself. The value add of the Commission would be a group of commissioners with expertise in their given field. To do otherwise would be to create a further level of bureaucracy with little differentiation from, nor likely benefit from existing arrangements.

Whether the TEC operates as an independent statutory body reporting to Parliament, or a Commission reporting to the Minister, it should prioritise transparent operations and provide a comprehensive and public-oriented report on an annual basis.

To ensure the TEC's effectiveness, it is crucial to include Commissioners who are notable experts in their respective fields. This not only adds credibility to the Commission's operations but also equips it with the knowledge base necessary for informed decision making. It is proposed that the TEQSA Chief Executive Officer and an Australian Research Council (ARC) representative be among the Commissioners or be given

right of attendance at the Commission, given their intimate roles within the regulation and innovation of the higher education landscape.

Moreover, the inclusion of a Jobs and Skills Australia (JSA) representative, a compliance expert, and an Equity Commissioner will ensure the TEC is attuned to the realities and challenges of the job market, legal compliance, and educational equity, respectively. Additionally, the Higher Education Standards Panel (HESP) could be reconstituted as a committee of the TEC. These roles bring vital perspectives to the decision-making process, encouraging comprehensive, well-rounded policies and would reinforce the commitment to inclusivity and diversity in higher education.

A teaching and learning expert would also be a critical component of the Commission. Their presence would ensure the Commission remains focused on improving educational outcomes and pedagogical innovation.

Equally, an independent sector representative should be included to offer a perspective that is distinct from the public sector and ensure the Commission's policies consider all corners of the higher education sector.

The Commission could be composed of full-time, part-time members, or a mix of both. This flexible approach allows for a dynamic and adaptable structure that can respond to the changing demands of the higher education sector.

C. Interrelationship with Existing Bodies (Recommendations 10-13)

There is significant risk that if the internal architecture of the new arrangement is not constructed carefully, there would be significant overlap, duplication, and confusion. This would render the whole undertaking a negative outcome, rather than a positive one.

The relationship between the Government and the sector needs to be redefined, transitioning from a hierarchical structure to a more dynamic, evidence-driven partnership. The Commission should serve as the bridge between the Government and higher education providers, fostering mutual respect and cooperation.

The establishment of the TEC provides an opportunity to reimagine the roles and functions of TEQSA, ASQA, and the ARC and to devise in an intentional manner the way in which these existing bodies exist and operate within a framework of an overarching, strategically focussed Commission.

It is important to acknowledge that there is a persistent gap between the expectations of both the Government and the Sector, and the outputs and performance of the regulatory bodies. This disparity often leads to inefficiencies, misunderstandings, and unmet goals. The creation of the TEC, with its strategic long-term focus, has the potential to bridge this gap. By concentrating on setting high-level standards and goals, the TEC can provide a clear and robust direction for the sector.

This strategic focus, in turn, would allow bodies like TEQSA, ASQA, and the ARC to concentrate on their core function - ensuring compliance and maintaining standards, development, and support. In this way, the TEC could facilitate a more coherent and effective system, where strategic planning and compliance are not only balanced, but also mutually reinforcing. This would contribute to a more responsive and efficient tertiary education sector that aligns with both government expectations and sector needs.

In this newly envisaged structure, the relationship between the TEC and the ARC can be redefined to foster a more collaborative and symbiotic alliance. Both organisations would have the opportunity to enhance their respective scopes, driving progress and improvement in their respective areas, while working toward the shared goal of elevating Australia's tertiary education sector.

One option would be to make TEQSA, ASQA, and the ARC subsidiaries of the TEC. This could result in the cessation of Commissioners of the three existing bodies, and simply appointing the Chairs or CEO of these bodies as Commissioners of the TEC. This would allow TEQSA, ASQA, and the ARC to focus more sharply on an administrative role, transferring any strategic role to the TEC.

Overall, the creation of the TEC could transform the dynamics of the existing institutions, encouraging a more effective and efficient system that enhances transparency, predictability, and performance, balances standard-setting and compliance, while paving the way for excellence and innovation. This approach could significantly enhance the overall performance and output of the tertiary education sector in Australia.

D. Conclusion

The Australian tertiary education sector needs a well-rounded, diverse, and proficient Tertiary Education Commission. The implementation of these proposals is instrumental in ensuring that the Commission is primed to champion excellence, foster innovation, and facilitate flexibility within the higher education sector.

The diverse and well-rounded nature of the proposed TEC would enable it to draw from a wealth of experience and expertise, thereby enabling it to effectively oversee and guide the sector. It would not only be able to anticipate potential challenges but also respond with solutions that are both innovative and flexible, ensuring the resilience and sustainability of the higher education sector.

The fostering of excellence is a crucial aspect of the proposed TEC's mandate. By promoting high standards and rigorous evaluation, the TEC would elevate the quality of education and research within the sector. Furthermore, by celebrating and rewarding outstanding achievements, the TEC could encourage institutions to continually strive for excellence.

Innovation, a key driver of progress in the higher education sector, would be another major focus of the TEC. By encouraging research and development, the TEC could help to create a vibrant and forward-thinking educational landscape. This could lead to breakthroughs in teaching and learning methodologies, advancements in research, and the development of cutting-edge courses and programs.

Flexibility, too, would be a key feature of the TEC's approach. By promoting flexible learning pathways and adaptive curriculum designs, the TEC could help to ensure that the sector is responsive to the changing needs of students and the broader society. This could result in a more inclusive and accessible higher education system that caters to a diverse range of students and promotes lifelong learning.

These recommendations, if implemented, could significantly transform the higher education sector, ensuring that the TEC is not only prepared to navigate the current landscape but also equipped to shape the future of Australian tertiary education, promoting a sector that is excellent, innovative, and flexible.

E. Who We Are

Independent Higher Education Australia Ltd. (IHEA) is a peak body established in 2001 to represent Australian independent (private sector) higher education institutions. Our membership spans independent universities, university colleges and other institutes of higher education all of which are registered higher education providers accredited by the national higher education regulator, TEQSA or associate members seeking registration.

Our Vision is that: students, domestic and international, have open and equitable access to world class independent higher education in Australia, built on the foundations of equity, choice, and diversity.

Our Mission is to represent independent higher education and promote recognition and respect of independent providers as they contribute to Australian education, the Australian economy, and to society in general. We achieve this by promoting continuous improvement of academic and quality standards within member institutions, by advocating equity for their staff and students, and by delivering services that further strengthen independent providers' reputations as innovative, sustainable, and responsive to the needs of industry and other relevant stakeholders in both higher education and vocational education and training. IHEA's commitment is to excellence, productivity and growth in independent higher education being delivered through a trusted Australian education system underpinned by equity, choice, and diversity.

IHEA members have different missions, scales, and course offerings across the full AQF range (Diplomas to Doctorates). Members comprise:

- 4 Australian Universities (Bond University, Torrens University, University of Divinity, Avondale University)
- 4 Australian University Colleges (Alphacrucis University College, Moore Theological College, Australian College of Theology and Sydney College of Divinity)
- 72 not-for-profit and for-profit Institutes of Higher Education and related corporate entities.

IHEA members educate over 130,000 students, or 74 percent of the students in the independent sector, in a wide range of disciplines, including law, agricultural science, architecture, business, accounting, tourism and hospitality, education, health sciences, theology, creative arts, information technology, and social sciences. A list of our full membership is provided in Appendix A.

IHEA holds a unique position in higher education as a representative peak body of higher education providers. Membership in IHEA is only open to providers registered with the Australian regulator – TEQSA. IHEA members include dual and multi-sector providers who also deliver VET and/ or English Language Intensive Courses for Overseas Students (ELICOS) courses

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Appendix



IHEA Member Institutions

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| Avondale University | Le Cordon Bleu Australia |
| Bond University | Leaders Institute |
| Torrens University | Lyons College |
| University of Divinity | Marcus Oldham College |
| Alphacrucis University College | Melbourne Institute of Technology |
| Australian College of Theology: Australian University College | Morling College |
| Moore Theological College: Australian University College | National Academy of Professional Studies - NAPS |
| Academies Australasia Polytechnic | National Institute of Organisation Dynamics Australia |
| Academy of Interactive Technology | Navitas |
| Adelaide Central School of Art | Australian College of Applied Professions |
| AIBI Higher Education | College of Business and Technology |
| APEX Institute of Higher Education | Educational Enterprises Australia |
| Australasian College of Health and Wellness | Melbourne Institute of Business and Technology |
| Australian College of Christian Studies | Navitas Bundoora |
| Australian College of Nursing | Queensland Institute of Business and Technology |
| Australian College of Physical Education | SAE Institute |
| Australian College of the Arts (COLLARTS) | South Australian Institute of Business and Technology |
| Australian Institute of Business | Sydney Institute of Business and Technology |
| Australian Institute of Business and Management | Perth Institute of Business and Technology |
| Australian Institute of Management | Western Sydney University International College |
| Australian Institute of Music | Ozford Institute of Higher Education |
| BBI – The Australian Institute of Theological Education | Perth Bible College |
| Campion College Australia | Photography Studies College |
| Christian Heritage College | Polytechnic Institute Australia |
| Eastern College Australia | Sheridan Institute of Higher Education |
| Education Centre of Australia | SP Jain School of Global Management |
| Asia Pacific International College | Sydney College of Divinity |
| Higher Education Leadership Institute | Sydney Institute of Higher Education |
| Endeavour College of Natural Health | Sydney International School of Technology and Commerce |
| EQUALS International | Tabor College Australia |
| Excelsia College | The College of Law |
| Governance Institute of Australia | The MIECAT Institute |
| Holmes Institute | The Institute of Creative Arts and Technology |
| ICHM | The Tax Institute Higher Education HEPCO |
| Ikon Institute of Australia | Torrens Global Education Services |
| Institute of Health and Management | Think: Colleges |
| Institute of Internal Auditors - Australia | Universal Business School Sydney |
| International College of Management, Sydney | Universal Higher Education |
| Kaplan Business School | UOW College |
| LCI Melbourne | Wentworth Institute of Higher Education |