



INDEPENDENT
HIGHER EDUCATION
AUSTRALIA

IHEA SUBMISSION

CONSULTATION ON TERTIARY EDUCATION QUALITY AND STANDARDS AGENCY'S (TEQSA) STAKEHOLDER ENGAGEMENT STRATEGY

20 May 2024

IHEA Submission

Consultation on a Revised Tertiary Education Quality and Standards Agency's (TEQSA) Stakeholder Engagement Strategy

Independent Higher Education Australia (IHEA) appreciates the opportunity to provide feedback on TEQSA's stakeholder engagement strategy, for which submissions are due by 5pm (AEST) 20 May 2024.

IHEA supports TEQSA's development of a stakeholder engagement strategy. Stakeholder engagement should be a central feature of how TEQSA operates with higher education providers and should be embedded in all of its operations. While the strategy puts in place a blueprint for TEQSA's engagement with stakeholders it won't alone guarantee that this is achieved.

IHEA recommends that the strategy be reviewed every three years in consultation with higher education providers, including independent providers. Ongoing feedback from providers as well as TEQSA's performance against its Service Charter should be considered and inform improvements and enhancements to TEQSA's approaches to engaging with stakeholders.

In the stakeholder engagement strategy, it outlines the ways in which it will engage, under "Share", "Consult" and "Involve and collaborate".

- Under "Share", it states that 'we often share information to inform stakeholders of new initiatives, changes and updates to relevant higher education issues'.
- Under "Consult", it states that "we consult stakeholders where there is a genuine opportunity to inform our work".
- Under "Involve and collaborate", it states that 'we may also engage with stakeholders for advice, to seek expertise, to share perspectives or experience, to generate innovative ideas, or to help address complex issues we consult stakeholders where there is a genuine opportunity to inform our work'.

For each of these ways of engagement, the wording should be updated to reflect an embedded approach to engaging with stakeholders. The language of "often", "may" or "where there is a benefit to inform TEQSA's work" imposes an unnecessary and concerning limitation about how TEQSA will engage. It is critical that stakeholders, such as IHEA and independent higher education providers, are at the forefront of TEQSA's engagement and follows the principles outlined below:

- Early engagement in the dialogue and development of policy and proposed changes that will impact them.
- Early communication about actual changes that will impact independent higher education providers.
- Understanding and utilising the expertise of independent higher education providers to ensure due consideration of issues that impact providers is reflected in TEQSA's processes and decisions.
- Establish communities of practice between TEQSA and higher education providers, including independent providers, on specific issues to workshop and share relevant experiences and issues.

It is imperative that TEQSA's stakeholder engagement strategy is implemented and operationalised in a way that is constructive, beneficial and supportive of the operations of independent higher education providers. This will only occur if TEQSA commits to reviewing its engagement strategy to ensure it is working as intended and to identify opportunities for continuous improvement. Its interaction with other strategies, and processes such as the Service Charter, should also be included in the Engagement Strategy.

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:

- Four private universities (Bond University, Torrens University, University of Divinity, Avondale University).
- Five University Colleges (Alphacrucis University College, Moore Theological College, Australian College of Theology, Sydney College of Divinity and SAE Institute).
- Seventy four not-for-profit and for-profit institutions of Higher Education; and related corporate entities.

IHEA members teach approximately 74 percent of the students in the independent sector (i.e., more than 130,000 students) and educate students in a range of disciplines, including law, agricultural science, architecture, business, accounting, tourism and hospitality, education, health sciences, theology, creative arts, information technology, and social sciences.

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. However, some IHEA members are 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 TO IHEA SUBMISSION



Australian Government

Tertiary Education Quality and Standards Agency

TEQSA draft stakeholder engagement strategy

TEQSA consultation paper, April 2024

TEQSA

The Tertiary Education Quality and Standards Agency (TEQSA) is committed to protecting and enhancing the integrity, quality and reputation of Australian higher education. The Tertiary Education Quality and Standards Agency (TEQSA) is committed to protecting and enhancing the integrity, quality and reputation of Australian higher education.

As an effective and efficient quality assurance regulator, we aim to build strong relationships with diverse stakeholders who are valued for their experience and expertise in higher education.

We are committed to creating engagement opportunities that are appropriate to the needs of the issue at hand, and that provide genuine opportunities for feedback to inform our work.

Supporting this approach will be a finalised TEQSA stakeholder engagement strategy.

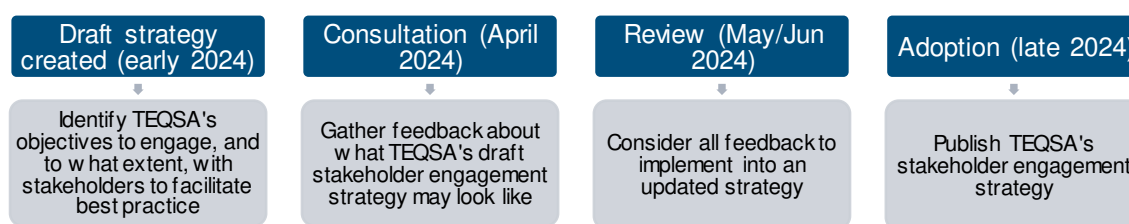
Why we're seeking your feedback

This draft strategy supports consistent, purposeful, meaningful, productive and transparent stakeholder engagement that delivers benefits for all involved.

We are seeking your feedback about the key principles we use to inform our approach to engagement to deliver the objectives outlined in [TEQSA's 2023-27 Corporate Plan](#).

In parallel to this consultation, TEQSA has opened a consultation process for our draft updated service charter. You can find out more about TEQSA's service charter review, and provide your feedback during the consultation period, at teqsa.gov.au/ServiceCharterReview.

Consultation timelines



Consultation on the draft strategy closes at 5pm (AEST) on Monday 20 May 2024.

You can make a submission before the due date by emailing standards@teqsa.gov.au.

After feedback closes

TEQSA will consider all submissions when feedback closes and develop a final stakeholder engagement strategy for adoption. We will also welcome ongoing sector feedback to inform our future approach to engagement.

We will publish the final strategy on our website and TEQSA's communication channels including the monthly e-News and our social media platforms.

Questions?

If you have any further questions, you can email us at standards@teqsa.gov.au.



Australian Government
Tertiary Education Quality and Standards Agency

DRAFT Stakeholder engagement strategy

April 2024



TEQSA

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Acknowledgement of Country

The Tertiary Education Quality and Standards Agency acknowledges the Traditional Owners and Custodians of Country throughout Australia and their continuing connection to land, waters and community. We pay our respect to their cultures and Elders past and present.

Our commitment to engagement

TEQSA's purpose is to protect and enhance the integrity, quality and reputation of Australian higher education.

We understand that to be an effective and efficient quality assurance regulatory agency for higher education, we must be responsive to the evolving needs and expectations of the Australian Government and the community.

TEQSA values the expertise, knowledge and experience our stakeholders contribute. Our stakeholder relationships are vital to informing our work and achieving the quality outcomes we seek for the sector.

We are committed to working with a broad range of stakeholders and building relationships based on TEQSA's values of trust, respect, accountability and collaboration.

Additionally, we acknowledge that not all issues or projects provide the same level of opportunity for consultation or active stakeholder participation. We consider when it's appropriate to engage with stakeholders, and to what extent, in order to facilitate best practice engagement and to provide genuine opportunities to inform our work.

Purpose of the strategy

This strategy details the key principles informing our approach to stakeholder engagement to support us to deliver the objectives outlined in [TEQSA's 2023-27 Corporate Plan](#).

This strategy supports consistent, purposeful, meaningful, productive and transparent stakeholder engagement that delivers benefits for all involved.

This strategy is based on the [Australian Public Service \(APS\) Framework for Engagement](#) and best practice stakeholder engagement theory and approaches, including from the International Association for Public Participation (IAP2).

Stakeholder engagement objectives

The objectives of this strategy are to:

1

Build, strengthen and nurture relationships with our stakeholders. Through dialogue, research and analysis we deliver genuine improvements to our guidance and educative materials, regulatory processes and outcomes.

2

Proactively seek engagement with stakeholders to inform our priorities, plans and regulatory approach.

3

Strengthen our engagement with students, and ensure we are listening carefully and acting on the issues that impact them.

4

Ensure stakeholders are clear on how we make our decisions and how they can influence them.

5

Make certain that our stakeholder engagement work is closely aligned with our Corporate Plan priorities and that our decisions are evidence based.

6

Engage a range of stakeholders in TEQSA's work so that views we hear reflect the diversity of Australian higher education. We will learn from the expertise and experience of others.

Our key stakeholders

We interact with a broad range of stakeholders from diverse backgrounds.

These include:

- higher education providers and their staff (current, prospective and past)
- students at Australian higher education providers (current, prospective and past)
- members of the public, employers, Commonwealth and state/territory government agencies
- peak bodies which advocate for providers members in the sector we regulate
- professional accreditation bodies
- international higher education quality assurance and regulatory organisations.

We aim to engage not only key stakeholders but to encourage and seek participation from stakeholders who may not be frequently heard or who may be harder to reach.

Note: This strategy does not directly apply to individual students, workers, employers or other entities when they interact with us for individual regulatory activities, or to the exercise of our statutory compliance and enforcement powers. These interactions are supported by our [Compliance and Enforcement Policy](#) and our [Service Charter](#).



Our engagement principles

The following 5 key principles underpin and guide our stakeholder engagement activities:

PURPOSEFUL AND EFFECTIVE

We clearly define our engagement objectives, choose the appropriate engagement approach for the situation and engage relevant stakeholders.



INCLUSIVE

We seek intelligence and insights from a range of sources, including industry, community, government, academia, and other non-traditional stakeholders.



We aim to provide fair access to engagement processes by identifying and enabling participation for stakeholders who may be harder to reach (including by removing barriers to participation).

TIMELY AND RESPONSIVE

Taking into account legislative and operational considerations, we engage with stakeholders in a timely manner and provide feedback that closes the loop.



TRANSPARENT AND ACCOUNTABLE

We are open and honest in our engagement with stakeholders. We seek to build trust and credibility in the engagement process, both in our actions and our communication with stakeholders.



RESPECTFUL

We value our stakeholders' time.

We acknowledge and respect the expertise and different perspectives of our stakeholders.

We respect the needs of stakeholders to access information, provide feedback and be heard.



We are clear about what we are seeking to achieve and the level of influence stakeholders have.

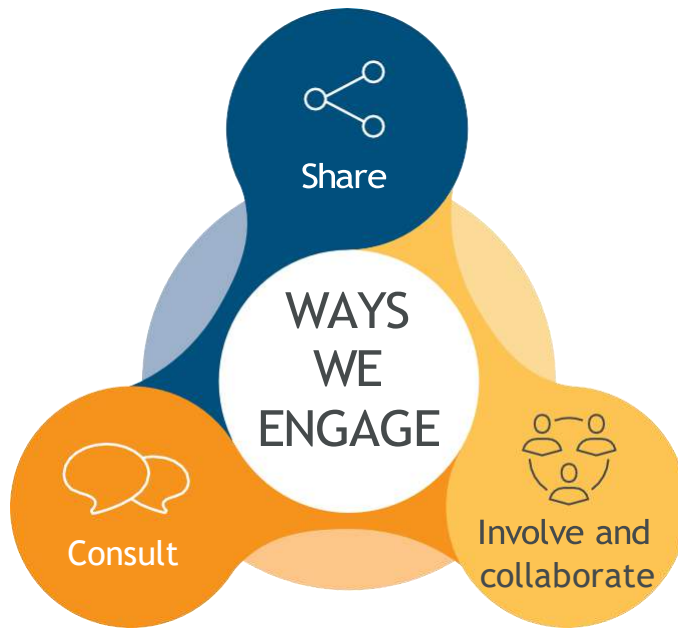
Levels of engagement

When we undertake our work, we consider whether it's appropriate to engage with stakeholders and to what extent according to the situation, time, skills and resources. Each method has its benefits and limitations, and when we engage with stakeholders we consider the most appropriate approach.

We consider:

- the engagement objectives and what's in scope to be influenced
- any limitations or reasons why engagement should not occur
- relevant stakeholders and their interest or expertise in the matter
- previous engagement with relevant stakeholders and their expectations
- the appropriate extent and timing of stakeholder involvement.

Ways we engage



In addition to supporting our work, effective engagement improves our stakeholders' understanding of TEQSA processes and the decisions we make. As such, our stakeholder activities are a combination of traditional methods of 'deliver and inform' to 'involve and collaborate'.

We consider the following ways to engage:



Share

We often share information to inform stakeholders of new initiatives, changes and updates to relevant higher education issues. Examples include:

- changes to the *Higher Education Standards Framework (Threshold Standards) 2021*, ESOS Framework and other legislative changes
- new or updated information, materials and resources (such as guidance notes or sector updates) that may be relevant or of interest to stakeholders or their clients
- changes to our operational model and policies, as well as our annual strategic priorities.

Our intention is to share information that is timely, concise, factual and user-friendly, across our channels including:

- our website, including news articles
- social media
- email updates and newsletters
- presentations and webinars
- TEQSA-hosted events, such as the annual TEQSA Conference.



Consult

We consult stakeholders where there is a genuine opportunity to inform our work.

Examples include:

- developing and updating website content
- developing new education resources
- developing presentations
- reviewing strategic priorities
- reviewing education resources and services
- considering the practical application of the Threshold Standards.

We are clear on the scope of the consultation, listen to and consider input and feedback, and share the outcomes of the consultation when we can. Examples include:

- surveys
- user testing
- direct email with TEQSA contacts for feedback
- focus groups.



Involve and collaborate

We may also engage with stakeholders for advice, to seek expertise, to share perspectives or experience, to generate innovative ideas, or to help address complex issues.

We may do this when addressing our strategic priorities or when delivering new initiatives.

When we involve and collaborate with our stakeholders, we are clear of the intent of the engagement and each other's roles. We ensure a range of views are sought and that stakeholders are provided appropriate scope, context and information to inform their engagement.

With consideration of our operating and regulatory environment, we take account of advice and recommendations from our stakeholders. Where relevant, we also seek stakeholders' involvement to implement solutions together.

We also work cooperatively and collaboratively across government to share information and ideas, and to support the development and delivery of higher education policy initiatives that are aligned with government objectives, the public interest and TEQSA's purpose.

Examples include:

- reference groups
- taskforces
- technical advisory groups
- cross-government working groups
- memorandums of understanding

- co-design projects
- bi-lateral and multi-lateral government forums.

Benefits of engagement

Successful stakeholder engagement enables TEQSA to deliver better quality assurance and regulatory outcomes.

This delivers long-term value for us and our stakeholders, by creating:

- better stakeholder knowledge, awareness and understanding of issues and processes
- early identification of synergies with TEQSA's work, encouraging integrated and comprehensive solutions to complex issues
- more open and transparent lines of communication and increased accountability of TEQSA.

Closing the loop

At TEQSA, we believe closing the engagement loop goes a long way in maintaining productive working relationships, encouraging future engagement and ensuring continued sector support for our work.

Providing meaningful feedback to our stakeholders about how their input has been used will ensure that all stakeholders can be confident their contributions have made a difference to the outcome of the project. This in turn encourages stakeholders to participate in the future.

Further information

For further information or to provide feedback on our stakeholder engagement strategy, please email us via teqsa.gov.au/contact-us