

Tertiary Education Quality and Standards Agency

Draft Provider Standards – Comments on the Consultation Draft

June 2011

Your information:

Navitas is a diversified global education provider that offers an extensive range of educational services for students and professionals including university programs, English language training and settlement services, creative media education, workforce education and student recruitment. Navitas is an Australian corporation ranked amongst the top 200 publicly listed companies on the ASX.

Navitas is the industry leader in pre-university and university pathway programs. It offers university programs from colleges in Australia, UK, US, Canada, Singapore, Sri Lanka and Africa.

English Language training includes the provision of English as second language courses for international students and English language, settlement and work preparation programs for migrants and refugees.

Navitas Workforce provides quality vocational training and higher education, coupled with employment and placement services in areas of key demand. Focusing on meeting business and industry needs for skilled human resources, it provides the capabilities that find, train and place “work ready” skilled employees.

Via SAE and Qantm, Navitas is now a leader in creative media education offering audio, film and new media qualifications around the world.

Navitas also offers student recruitment services in India and China for universities and other educational institutions in Australia, Canada, US and UK.

Further details about Navitas are available at www.navitas.com.

Name: James Fuller

Position: Group Manager Public Relations

Organisation: Navitas Limited

Email: james.fuller@navitas.com

Provider Registration Standards

The Standard	
General Comments	Navitas welcomes the Draft Provider registration Standards and the further clarity and higher level of quality assurance they will bring to Australia’s Higher Education sector. However more detail should be provided via guidelines and definitions of key terms to enable providers to effectively meet the requirements. Additionally, Navitas suggests that some of the key points - as outlined below, should be further refined to provide clearer guidance and facilitate effective compliance.
Standard 1:	Navitas agrees with the principal that a provider disclose relevant information to

<p>Provider Standing</p>	<p>TEQSA to enable TEQSA to make an informed decision on a provider's standing. However the requirements under draft sections 1.4 and 1.5 are very broad and potentially both difficult and expensive to provide. Navitas recommends a reasonable time frame be inserted into the requirements in regard to a provider's history, perhaps 10 years, within which providers would then be expected to supply information. Additionally, the requirements of 1.4 and 1.5 seem quite similar and for ease of understanding and use it is suggested that they be merged into one. TEQSA will also need to give consideration to how these requirements will work in the case of new ventures where past business operations etc will not be available.</p> <p>More generally, there is a need to consider whether the information required is pertinent to current and future operation eg old financials, management, courses and operating structures may have no relevance to current operations.</p>
<p>Standard 2: Financial viability and safeguards</p>	<p>Navitas recommends that more detail be outlined around the suggestion that providers prove financial viability and how that will be measured.</p> <p>Navitas considers that a provider's financial viability should be measured by not only traditional ratio analysis but other qualitative measures such as bank guarantees, credit history reports and recent years of profitable operation. Allowance needs to be made for investment activity and areas of growth which may give broader insight.</p>
<p>Standard 3: Corporate and academic governance</p>	<p>Navitas welcomes the commitment to corporate and academic governance as detailed in standard three but recommends that the providers governing body should have the power to delegate the authority to sign testamurs to relevant senior staff as opposed to taking direct responsibility for the conferral of higher education awards (3.1).</p> <p>Navitas believes that a providers governing body should combine internal and external members not a majority of external members as currently suggested under point 3.2. This is especially the case where a provider is a public company or a wholly owned subsidiary of a public company.</p> <p>Navitas also suggests that the proposal to require external course advisory committees (3.7) will be problematic for many smaller providers, or providers with corporate or governance structures that are different from that of a university and recommends that an external course advisory committee should not be a requirement.</p> <p>Finally further guidance should be provided, perhaps as guidelines, on any international conventions or external requirements that may become broader academic standards that providers would be required to meet.</p>
<p>Standard 4: Primacy of academic quality and integrity</p>	<p>Navitas believes that academic staff should be free to make public comment on issues that lie within their area of expertise but that point 4.3 should be further refined to read 'area of academic expertise'.</p>
<p>Standard 5: Management and Human resources</p>	<p>No comment.</p>
<p>Standard 6: Responsibilities to students</p>	<p>Navitas recommends that some of the suggested points within the responsibilities to students section require further qualification and should also be adaptable dependent on a provider's size and resources. For instance accommodation and health services are very expensive and may only be used by a small percentage of students.</p> <p>The providers Responsibilities to students should also acknowledge the appropriateness of the provider upholding its education standards in balancing the need to meet the varying learning needs of students.</p> <p>Additionally the term 'volume of learning' should be clarified as it is not a term often used within higher education.</p>

Standard 7: Physical and electronic resources and infrastructure	No comment.
--	-------------

Provider Category Standards

The Standard	Comments
General Comments	Navitas commends TEQSA for Draft Provider Category Standards that encourage non public Higher Education provider institutions, particularly those that include a research focus, to aspire to an increasingly higher level of quality provision at the course and/or discipline level. Navitas also suggests that rigorous trialling and monitoring will need to occur to ensure that standards are not lowered via the awarding of self-accreditation to some providers.
“Australian University” Category	No comment.
“Australian University College” Category	No comment.
“Australian University of Specialisation” Category	No comment.
“Higher Education Provider” Category	No comment.
“Overseas University” Category	No comment.
“Overseas University of Specialisation” Category	No comment.
Criteria for awarding self-accrediting authority	Navitas suggests that the criteria for awarding self-accreditation to some providers seem valid in theory but will require rigorous trialling and evaluation to ensure that standards are not lowered.

Provider Course Accreditation Standards

The Standard	Comments
General Comments	Navitas welcomes the draft Provider Course Accreditation Standards as they will contribute to the high level of educational standards and quality assurance in Australian Higher Education whilst allowing suitable flexibility. However as per our points below there remain some areas where more clarity would be welcomed or where greater flexibility should be allowed.
Standard 1 Course design is appropriate and meets the Qualifications	Navitas welcomes the move to require providers to develop students’ English language proficiency as part of course accreditation.

Standards	
Standard 2 Course resourcing and information is adequate	No comment.
Standard 3 Admission criteria are appropriate	No comment.
Standard 4 Teaching and learning are of high quality	Navitas suggests that point 4.2 could be too restrictive and could actively discourage future teachers especially specialist educators with a wealth of experience but with an undergraduate degree only. It is recommended that the wording be amended to 'provider <i>aims to ensure</i> that people' or that a set percentage is determined for the number of staff with qualifications above those being taught.
Standard 5 Assessment is effective and expected student learning outcomes are achieved	Navitas agrees with the general objectives of point 5.6 but it is suggested that TEQSA should investigate and promote best practice methodologies for ways in which providers can demonstrate that students have developed appropriate English language proficiency during their courses.
Standard 6 Course monitoring, review, updating and termination are appropriately managed.	No comment.

Any other comments
<p>Navitas welcomes the opportunity to provide comment on the Draft Provider Standards and congratulates the Commonwealth government for their willingness to consult widely on this important matter.</p> <p>As outlined in this submission Navitas suggests that the Standards do require further minor development in some areas either with additional information or further clarification.</p> <p>Navitas believes that the Draft Provider Standards are comprehensive and will give Higher Education Provider's greater guidance and flexibility with regard to regulatory compliance and quality assurance and improvement. It will also be important to give the sector time to adapt to these changes and this will need to be reflected in reporting requirements and providing a context for the progression that is being sought.</p>