Future directions for TEQSA's regulatory processes
Sector discussion Paper – Navitas Limited submission
October 2013

Section A - Renewal of Registration

Consultation questions: Renewal of registration
Question A1: Do you agree with TEQSA's proposals for reforming renewal of registration processes? If not, why, and what would you propose instead?
Response: Navitas thanks TEQSA for its commitment to continuous improvement of its regulatory processes and is supportive of the reform proposals presented in the discussion paper.   Further, Navitas is encouraged by TEQSA's commitment to the three principles of reflecting risk, regulatory necessity and proportionate regulations that underpin its regulatory approach as illustrated through the discussion paper. It is critical that regulatory burden be proportional to risk and track record.
Question A2: Are the proposed core evidence requirements as listed at **Attachment A** appropriate? If not, why, and what would you propose instead?
Response: Navitas believes that the proposed core evidence requirements as listed at Attachment A are appropriate in isolation. Navitas welcomes the use of electronic submission of evidence. However, Navitas urges TEQSA to give consideration to other measures that may assist in further reducing evidence requirements to address any cumulative provider regulatory burden in context, e.g., where an organisation has multiple provider registrations.

Section B - Course Accreditation

Consultation questions: Course accreditation
Question B1: Do you agree with TEQSA's proposals for reforming course accreditation processes? If not, why, and what would you propose instead?
Response: Navitas supports TEQSA's proposals for reforming course accreditation processes.   However, Navitas urges that the reform agenda provide a streamlined, quicker process in the future. The regulatory framework currently disadvantages non self-accrediting higher education institutions in terms of developing and introducing new courses given the current timelines involved. Navitas exhorts TEQSA to commit to shorter timeframes for approval processes of low risk providers.   In addition, Navitas wished to see more documentation and evidence as to how TEQSA works more closely with professional accreditation authorities to reduce the burden on institutions. Currently, little detail about collaborative processes is known.
Question B2: Are the proposed core evidence requirements as listed at **Attachment B** appropriate? If not, why, and what would you propose instead?
Response: As above, Navitas believes that the proposed core evidence requirements as listed at Attachment B are appropriate in isolation. However, Navitas urges TEQSA to give consideration to other measures

that may assist in further reducing evidence requirements to address any cumulative provider regulatory burden in context, e.g., where an organisation has multiple provider registrations.

TEQSA's proposed increased reliance on the accumulated regulatory knowledge about a provider with the view to reduce evidence requirements based on a provider's level of risk, course accreditation history and history of course delivery and accreditation in the same field of education and up to the same AQF level is, however, particularly encouraging in terms of reducing the regulatory burden of providers.

Section C - Renewal of course accreditation

Consultation questions: Renewal of course accreditation
Question C1: Do you agree with TEQSA's proposals for reforming renewal of course accreditation processes? If not, why, and what would you propose instead?
Response: Navitas supports TEQSA's proposals for reforming renewal of accreditation processes.
Question C2: Are the proposed core evidence requirements as listed at **Attachment C** appropriate? If not, why, and what would you propose instead?

Response:
As above, Navitas believes that the proposed core evidence requirements as listed at Attachment C are appropriate in isolation, however urges TEQSA to give consideration to other measures that may assist in further reducing evidence requirements to address any cumulative provider regulatory burden in context.
 	
More specifically, Navitas offers the following comments:
 	
 ▪ Navitas is particularly supportive of the proposed introduction of a provider website portal that will enable secure transfer of electronic submission of applications to TEQSA as
   (a) it complements Navitas' own corporate sustainability goals of ensuring environmental awareness and sustainability.
   (b) a document repository will reduce the need to re-submit the same document multiple times across for similar purposes
 	
 ▪ Navitas encourages TEQSA to clearly define expectations related to requirements such as 'robustness' of assessment.