

## NAVITAS

Navitas Ltd is an Australian global education leader providing pre-university and university programs, English language courses, migrant education and settlement services, creative media education, student recruitment, professional development and corporate training services to more than 80,000 students across a network of over 110 colleges and campuses in 27 countries. Navitas listed on the Australian Securities Exchange (ASX) in 2004 and is now an S&P/ASX Top 100 Company, employing more than 5,500 staff globally.

Navitas believes an innovative, diverse, globally connected public and private education sector is critical to Australia's future prosperity, intellectual capital and social cohesion. Navitas also recommends that private education providers are integral to meeting the Government's objectives for a demand driven higher education system.

Navitas welcomes this opportunity to provide comment on the draft Higher Education Standards.

### **Q1. Do you broadly support the proposed *Framework*? If not, why?**

- a. Navitas and its entities (including ACAP, NCPS) broadly support the proposed revised Framework.
- b. Navitas also wishes to express our appreciation of the work that has been undertaken by the Higher Education Standards Panel in developing the proposed framework and in preparing the accompanying exemplary explanation of the proposed framework, which we have found most useful.

### **Q2. Do you wish to make any suggestions in relation to the specific content of the *Framework*?**

Navitas makes the following comments and suggestions in connection with Part A, Standards for Higher Education:

- a. Navitas broadly supports the proposed revised Standards for Higher Education.
- b. The organisation of the standards and use of taxonomic headings for 'Domains' and 'Sections' is more logical in terms of a higher education provider's characteristics and ease of referencing the standards;
- c. The increased flexibility, the enhanced emphasis on outputs and lesser focus on inputs, combined with the proposed framework's focus on minimal acceptable requirements, well reflects the regulatory principles of reflective risk, proportionate regulation and regulatory necessity.
- d. Navitas for the most part (see last bullet point below), supports the enhanced transparency that is achieved in the use of core amplifying mandatory example points that need to be met to comply with the Standards on the understanding that the intent communicated in the Background Paper, at F(b)xiii, p. 3 carries through to the final framework and standards, i.e. *'Nothing in the design of the Standards precludes them from being applied flexibly and differently across different providers for regulatory purposes, according to regulatory necessary and risk'*.
- e. The use of cross-references to essential related information and provision of non-mandatory reference points is helpful and welcomed.
- f. Navitas requests the Panel consider clarification in Section 1.5, Standard 2(a) requiring 'mastery of knowledge, skills, and application that characterises the fields of education or disciplines involved'. It is the view of Navitas that the term 'mastery' is not applicable to sub-bachelor higher education awards. It is suggested that, as a proposed amendment to

overcome this anomaly, the standard read; 'Relevant mastery of knowledge, skills, and application that characterises the fields of education or disciplines involved and AQF level.

- g. Further to the above point, Navitas requests the panel consider Section 1.5, Standard 2(c) to include reference to the appropriate AQF level with respect to the knowledge and skills required for employment.
- h. Navitas would welcome further clarity in connection with expectations associated with Standard 6.1 Corporate Governance 2(b) in connection with performance targets. As drafted, the expected breadth and depth of such targets is unclear as to whether such targets may be qualitative and/or quantitative.

Navitas makes the following comments and suggestions in connection with Part B, Criteria for Higher Education Providers:

- i. Navitas welcomes the streamlined and simplified, yet clearly robust, rigorous and risk based approach adopted in the proposed revised Criteria for Higher Education Providers.

Navitas makes the following comments and suggestions in connection with Part C, Application of the Higher Education Standards Framework for Regulatory Purposes:

- j. Navitas welcomes the additional direction that is provided in this Part which helps make clearer how the Standards may be applied for regulatory purposes, having regard to the requirements of the TEQSA Act 2011.

Navitas makes the following comments and suggestions in connection with Part D, Definitions and Explanations of Terms:

- k. Navitas appreciates the inclusion of this Part and acknowledge its usefulness, in particular in connection with reducing unnecessary repetition in Part B.

**Q3. Do you wish to make any overall or general comments about the *Framework*?**

- a. As indicated at Q1 above, Navitas broadly supports the proposed Framework. The reorganisation of framework to four parts appears logical and to have significantly reduced the amount of repetition across the standards, which we much welcome.
- b. Following on from 2f and 2g (above) Navitas requests that the Standards are cognisant of the diversity of higher education outcomes including employment and further higher education study.
- c. Navitas is particularly appreciative of the significant body of work that has been undertaken by the Panel to, where possible, harmonise the proposed revised Framework and Standards with the ESOS Regulatory Framework, including the National Code. Navitas supports the Panel's suggestion that a more comprehensive review of the relationship of these instruments is indeed needed in time to achieve a further simplification of regulatory processes for providers and regulators alike.
- d.

Submitted by Navitas Limited and authorised by Navitas CEO, Rod Jones.  
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