

19 April 2012

Professor Alan Robson
Higher Education Standards Panel Executive
GPO Box 1672
Melbourne VIC 3001

Via email: info@HEstandards.gov.au

Dear Professor Robson

ACPET Response - Higher Education Standards Panel – Draft Standards Consultation

The Australian Council for Private Education and Training (ACPET) welcomes the opportunity to respond to the Higher Education Standards Panel *Call for Comment (Number 1, March 2013)*.

ACPET is the peak body representing private education and training providers in Australia, with approximately 1,000 members in all States and Territories. ACPET has approximately 100 members delivering higher education throughout Australia. According to the recent Grattan Institute analysis of higher education, in Australia there are approximately 59,000 equivalent full time students currently enrolled in non-university higher education courses.

Non university higher education providers form a very diverse group of specialised institutions. ACPET's higher education members deliver degrees in the fields of theology, business, information technology, natural therapies, hospitality, management, teaching, health, law, design, accounting, multi-media, music and public safety. Approximately half of Australia's non self accrediting institutions are approved under the *Higher Education Support Act 2003* as FEE HELP providers.

ACPET has advocated for the revision of the Threshold Standards and for streamlining both the style and content of the standards' statements in order to avoid unnecessary duplication and complexity, and provide relevant supporting information and guidance to providers in interpreting the standards effectively and appropriately in order to achieve compliance. ACPET advocates that providing simple and clear information is the most effective means of supporting providers meet and maintain the required standard level, and for regulators in interpreting the required standard level.

In response to the *Call for Comment*, ACPET has consulted widely with its members, and is pleased to offer the following comments.

Q1. Do you broadly support the proposed format for the standards?

ACPET broadly supports the proposed format for the standards. The format style, as applied in both of the newly proposed draft standards, **Course Design** and **Learning Outcomes**, appears to be consistent and effective in conveying the required information.

As suggested, labelling the points in lists facilitates referencing, avoiding possible confusion.

The format used is succinct, and appears, at least in the case of both new draft standards, to avoid duplication in content and repetition. ACPET acknowledges though that some repetition may at times be necessary in the development of future standards in order to clarify information provided, and avoid individual standards becoming too vague.

Q2. Do you support the inclusion of reference points as proposed?

ACPET supports the inclusion of reference points, to provide guidance to both providers and regulators.

ACPET welcomes the objective that the reference points should “not be[ing] prescriptive or seek[ing] to standardise a provider’s approach to meeting the standard”, allowing some flexibility and acknowledging that diversity is welcome, and does not necessarily signify non compliance.

ACPET welcomes the opportunity to revisit the two draft standards (Course Design and Learning Outcomes) in future, upon the release of subsequent standards.

Yours sincerely,

Claire Field
Chief Executive Officer