AFTRS RESPONSE TO THE REVIEW OF THE IMPACT OF THE TERTIARY EDUCATION QUALITY AND STANDARDS AGENCY ACT 2011(CTH) (THE TEQSA ACT) ON THE HIGHER EDUCATION SECTOR

The Australian Film, Television and Radio School (AFTRS) wishes to contribute to the expert review of Review of the impact of the Tertiary Education Quality and Standards Agency Act 2011(Cth) (the TEQSA Act) on the higher education sector.

1. What has changed for the sector in moving to a single national regulatory framework from multiple state- and territory-specific arrangements.

Not applicable to AFTRS as a federally funded higher education provider and cultural agency. AFTRS initially came under the auspice of AUQA.

2. The extent to which the TEQSA Act has contributed to improved quality in the delivery of higher education.

In identifying domains of quality assurance across the operations of the school, and in establishing nationally-recognised requirements for Australian award programs, the TEQSA Act has been broadly beneficial for the Australian Film, Television, and Radio School.

However, as a small institution providing practice-based education in a specific range of industry skills, insuring that the legislative requirements are met has occasionally been an administrative and financial burden, particularly in cases where the Higher Education Standards Framework identifies quality assurance areas more specifically relevant to university providers.

As a provider of industry-specific professional education, TEQSA agency requirements relating to academic research, academic qualifications required of teaching staff, and some of the regulations relating to degree delivery are not the most effective quality assurance measures for teaching methods grounded in creative practice and industry engagement.

3. The extent to which the TEQSA Act has contributed to improved regulation.

AFTRS supports the need for the higher education sector to demonstrate it meets standards and is accountable for the expenditure of public funds.

AFTRS is a self-accrediting Higher Education Provider, established by the Australian Film, Television and Radio School Act 1973. It is unique in the higher education sector in that it is also a cultural agency, funded by the Federal Government through the Office for the Arts. The School’s funding arrangements and achievement of its key performance indicators are reported on through the Federal Budget process and documented in the Portfolio Budget Statements that are released on Budget night. In the context of the broader higher education sector, in particular universities, AFTRS is a very small institution with
approximately 500 students per annum and a full-time teaching staff of approximately 30, supplemented by specialist guest lecturers.

AFTRS position in terms of how it is funded and its reporting requirements are heavily scrutinised and the requirements of TEQSA have added to this compliance burden. The three principles of proportionality, risk and necessity are important to AFTRS as a unique higher education provider.

4. Whether there is unnecessary overlap with other legislation, for example, the *Education Services for Overseas Students Act 2000*, the *National Vocational Education and Training Regulator Act 2011* and the *Higher Education Support Act 2003*.

Not relevant to AFTRS activities.

5. Whether there are amendments to the TEQSA Act or other changes that would enhance the Act’s impact or its administration.

As a small institution providing practice-based education in a specific range of industry skills, ensuring that the legislative requirements are met can be an administrative and financial burden, particularly in cases where the Higher Education Standards Framework identifies quality assurance areas that are relevant to university providers given their size and scope, but not to smaller institutions like AFTRS.

As a provider of industry-specific professional education, TEQSA agency requirements relating to academic research, academic qualifications required of teaching staff, and some of the regulations relating to degree delivery are not the most relevant quality assurance measures for teaching methods grounded in creative practice and industry engagement.

In terms of the introduction of the new national standards for higher education in Australia – the Higher Education Standards Framework (Threshold Standards) 2015 – this reflects TEQSA’s responsiveness to the higher education sector’s feedback in reviewing the original standards. The new standards provide a much clearer and effective way for AFTRS to monitor compliance.

6. Whether the required functions of the Higher Education Standards Panel are adequately reflected in the TEQSA Act.

No comment.

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