



Australian Government  
Australian Skills Quality Authority

ASQA

5 September 2023

Ms Kate Chipperfield  
Assistant Secretary  
Australian Universities Accord Implementation  
Department of Education

Dear Ms Chipperfield

The Australian Skills Quality Authority (ASQA) welcomes the release of the Australian Universities Accord Interim Report (Interim Report) and thank you for the opportunity to respond. This response focusses on a few key elements of the Interim Report with relevance to ASQA's role as the National Vocational Education and Training (VET) Regulator for registered training organisations (RTOs).

ASQA is focussed on ensuring quality vocational education and training so that students, industry, governments and the community can have confidence in the integrity of qualifications issued by training providers.

As of 30 June 2023, ASQA regulates 3,762 RTOs. There are currently six dual sector universities within Australia with legislative obligations to provide the full continuum of Australian Qualifications (AQF levels 1-10). These universities are required to meet the regulatory obligations of both ASQA and the Tertiary Education Quality and Standards Agency (TEQSA).

#### *Regulatory approaches supporting flexibility and innovation*

The Interim Report recognises that many students move between the higher education and vocational education sectors throughout their lifetime, using vocational education as a pathway to higher education or an opportunity to develop job specific skills and competencies.

Consistent with objectives of the National Vocational Education and Training Regulator Act, 2011, ASQA works to protect and enhance quality, flexibility and innovation in VET. The regulatory framework we administer reflects the history, structures and evolving nature of vocational education and training in Australia. However, both ASQA and TEQSA share regulatory best practice principles that underpin our respective activities - risk-based and data driven, collaboration and engagement, and continuous improvement and building trust. These shared principles enable us to jointly reduce regulatory overlap and collaborate to improve regulatory outcomes.

We have established a Dual Sector Provider Working Group to jointly explore opportunities for more efficient and effective regulation of dual sector providers. Examples of our recent collaboration include:

- A joint approach to allowing temporary flexibility in regulatory arrangements regarding ESOS course delivery requirements to overseas students during the COVID-19 pandemic.
- A joint approach to the transition to compliance with the ESOS National Code in 2022.

- Participation in the Education Regulators and Immigration Committee (ERIC) to collaboratively tackle integrity concerns in the International Education sector
- Memoranda of Understanding (MOU) to include information sharing protocols and collaboration on government policy reviews.

There are several priority areas that we have considered for further collaboration with TEQSA including improving student welfare, supporting governing bodies to improve their effectiveness and the use of AI in teaching and assessment. We continue to explore further opportunities for greater regulatory alignment including assessment and evidencing requirements between the Standards for RTO's and the Higher Education Standards Framework.

### *Student welfare*

A critical part of ASQA's role as regulator is to safeguard student welfare through maintaining and monitoring the quality of vocational education in Australia. Under *The Standards for Registered Training Organisations 2015* providers are required to determine the support needs for individual learners and provide access to the services necessary to help learners succeed in obtaining their qualifications. The Interim Report has noted that the introduction of a national student charter is under consideration. ASQA would welcome discussion on how the development of a national student charter in Australia could strengthen the support and guidance provided to students enrolled into vocational courses of study, aligning obligations to students in both the higher education and vocational sectors.

Delivery to international students, including unethical practices of third-party education agents continues to be a regulatory priority for ASQA and a focus across government, to protect and enhance Australia's reputation for quality education and training services. ASQA is interested in the way in which the safety of students studying in Australia under the *Education Services for Overseas Students Act 2000* and National Code could be further supported by a national student charter.

### *Qualifications architecture and role of VET*

A key driver for ASQA is supporting Government's focus on ensuring the VET system is responding to the skills and labour needs of the Australian economy. A high-quality VET sector is crucial as it is the gateway to the skills required for a prosperous society and secure economy. Ensuring students receive the skills and training necessary for secure work and career opportunities is critical for a prosperous society and securing Australia's future economic growth.

We note that the Interim Report supports progression of findings and recommendations from the *AQF Review of the Australian Qualifications Framework 2018*. In particular, that a simplified framework that provides greater transparency would be beneficial for both sectors. However, the misconception that VET provides a lower quality training products than higher education courses can create a barrier including for the development of clear credit and Recognition of Prior Learning pathways between the VET and higher education sectors.

ASQA would support further consideration into how parity of esteem between the sectors might be achieved, including exploring further opportunities to shift the discourse within Australia's education system to provide greater community understanding of the purpose and objectives of both sectors to enable better understanding of the roles and value of each.

There is also evidence of a strong demand and appetite for short duration upskilling opportunities within Australia. ASQA would welcome further consideration of how formal recognition of micro credentials within the AQF could be facilitated.

#### *Governance of reform*

Finally, ASQA's current environmental risk scan identified the pace, scale and complexity of sector reform initiatives as both a risk and benefit for the sector. Where training providers have insufficient governance maturity, they may lack the agility to respond to sector changes and industry priorities or fail to assure compliance in a fast-evolving sector and with impacts on provider capacity for quality VET. ASQA continues to support provider capacity for quality VET through broad based education and engagement.

ASQA looks forward to the progress of the Australian Universities Accord process and contributing through the important role we play in helping shape the regulatory framework. In doing so, we continue to be responsive to government priorities and ensure that the focus of our regulation safeguards student welfare and the quality of VET, fosters a world-class VET sector through regulatory action, and that we collaborate to enhance the reputation of the VET sector and support and protect students.

Yours sincerely



Saxon Rice

Chief Executive Officer  
Australian Skills Quality Authority