



Australian Government

Department of Education, Science and Training

A National Quality Strategy for Australian Transnational Education and Training:

A Discussion Paper

April 2005

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ISBN 1 920911 138

DEST No. 7236.AEID05A

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Minister's Foreword

It is with great pleasure that I present for your consideration this discussion paper, '*A national quality strategy for Australian transnational education and training*'.

Australian education and training providers operate in an increasingly transnational environment. Curriculum, instructors and programmes all reach across borders. Courses are increasingly delivered at international branch campuses, through transnational joint ventures and through twinning programmes.

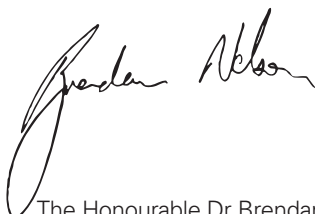
As I emphasised in my 2003 Ministerial Statement, *Engaging the World through Education*, the internationalisation of Australian education and training generates many individual and community benefits. Engagement in international education strengthens Australian democracy and multiculturalism. It helps Australian workers operate more effectively in a global environment. And the participation of international students in Australia's excellent education and training system, within Australia and offshore, strengthens Australia's relationships with other countries.

About one in every four international students in the Australian education and training system is now enrolled offshore. Given this dynamic growth in cross-border activity, it is time to open a substantial dialogue on transnational quality.

Australia's quality assurance systems are robust and highly effective. To continue to meet the needs of international students, their parents, overseas governments and potential employers into the future, the Australian Government is taking a forward-looking approach to quality.

My goal is to develop a national quality strategy for transnational education and training. An important element of the strategy will be to enhance international recognition of Australia as a provider of high quality education and training services.

I ask you to consider the concepts raised in this discussion paper, and encourage you to provide your perspective, expertise and critical feedback on the transnational quality strategy.



The Honourable Dr Brendan Nelson MP
Minister for Education, Science and Training

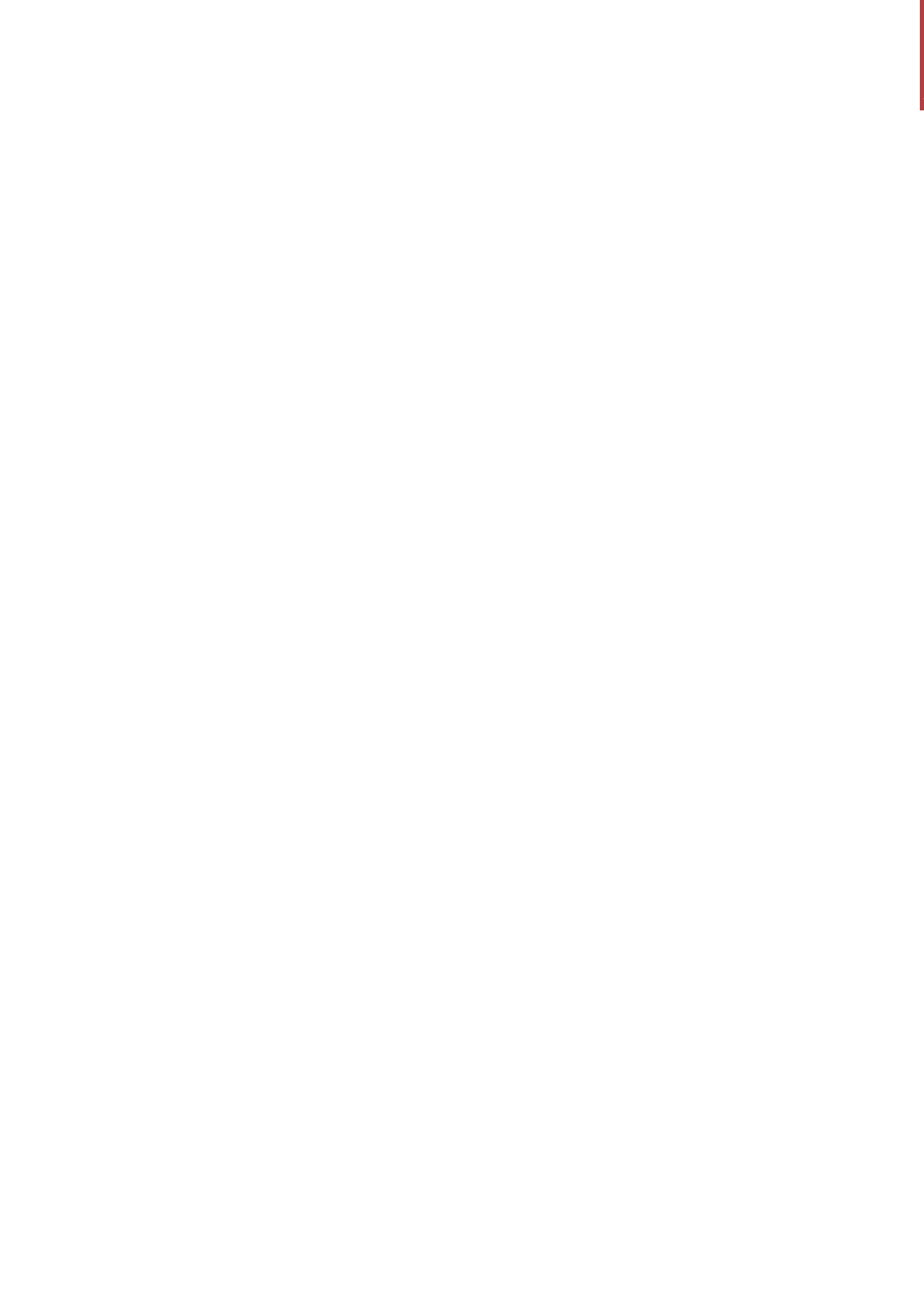


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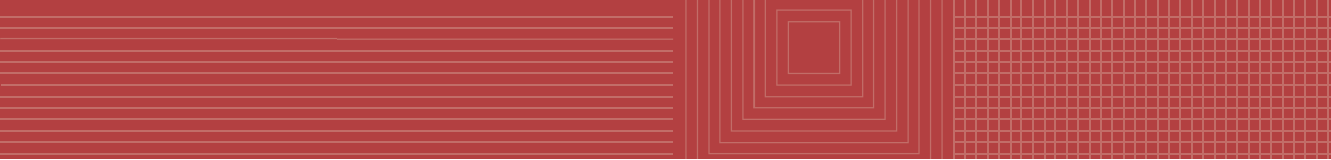
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Executive Summary

- i. Australia is a leading provider of quality education and training, both within and outside Australia. All sectors of education – higher education, vocational education and training, schools, English language courses and foundation programs – are offered offshore. These transnational activities are expanding. In 2003 55,000 students studied higher education courses offshore and another 18,300 studied offshore VET courses with public providers.
- ii. Courses under the Australian Qualification Framework have robust and effective quality assurance arrangements. These quality systems include both regulatory and non-regulatory activities and involve a range of parties including education and training providers, industry associations, State and Territory Governments and the Australian Government. Despite its strengths, stakeholders including students and other governments can find the system confusing, and the Australian Government is therefore seeking to improve the accessibility of information on Australia's quality assurance and education systems.
- iii. As providers develop and apply new practices, it is vital that transnational education and training activities continue to meet the demands for quality by international students, their parents, governments and potential employers. To respond to this challenge, the Australian Government is proposing that a national quality strategy for transnational education and training be developed, to draw together the many excellent quality assurance arrangements already in place for offshore delivery in each of the sectors.
- iv. Such a strategy will ensure that quality assurance arrangements are robust, nationally consistent, easily comprehensible, and that they promote the international recognition of Australia as a provider of high quality education and training services. Ultimately the strategy will help maintain Australia's position as an international leader.
- v. It is proposed that the transnational quality strategy will fulfil the following **four principles**:
 1. Ensure that Australia's quality assurance framework is **well understood** and **well regarded** within Australia and internationally;
 2. Make clear to providers and consumers the **accountabilities** in offshore education and training;
 3. Ensure that accreditation and audit functions are undertaken **transparently**; and

4. Ensure **equivalence** between courses/programs offered within Australia and offshore.
- vi. Through these principles, the transnational quality strategy will have the effect of:
- Protecting and strengthening the reputations of bona fide Australian education and training providers and by association the Australian system as a whole, in order to protect an important export industry;
 - Promoting good practice in transnational education and training;
 - Strengthening Australia's relations with other governments; and
 - Positioning Australia as the provider of choice in the international market.
- vii. The transnational quality strategy will be pursued through activities in two key areas:
- **Improving communication and promotion** of Australia's quality framework to all stakeholders, within Australia and internationally; and
 - **Strengthening of the national quality framework**, which comprises both regulatory and non-regulatory activities.
- viii. The strategy will also incorporate feedback and review mechanisms to ensure it remains relevant and effective.
- ix. A communications and promotion strategy could include:
- Greater promotion of the quality of Australian courses and our quality assurance system to stakeholders, including governments, students, and parents – this would include explanation of Australian approaches to recognition of prior learning and flexible delivery;
 - Website upgrading to: present accreditation information in a standard format across websites with links to associated State and Territory jurisdictions; list direct points of contact for queries and for student and other stakeholder complaints; and/or repackaging information into a single website or database;
 - Enhanced collection of data on offshore students and operations; and
 - A future step may be to provide a centralised listing of all offshore programs provided by accredited Australian providers.

- 
- x. Three approaches to strengthen the quality framework are explored:
- **Augmented Current Model:** Maintaining the current arrangements and lines of responsibility for transnational quality assurance but with greater sharing of information and best practice.
 - **Advisory Board Model:** A joint industry-government board would develop standards, codify best practice and establish protocols in relation to offshore activities. Functions would remain with the current quality assurance authorities.
 - **National Authority Model:** While governments would remain responsible for quality assurance arrangements, a National Authority would be established to which the existing State and Territory regulatory bodies would delegate quality assurance functions for offshore provision.
- xi. Proposals for other models or combinations of models are welcome. It is possible that the best model may be a hybrid, with aspects of different models applying for each sector.
- xii. The VET discussion paper *Skilling Australia: New Directions for Vocational Education and Training* proposes that a new national agency be established to strengthen focus on quality, particularly offshore quality. If this approach is agreed, it will be taken into account in the transnational quality strategy.
- xiii. The major focus of this discussion paper is courses leading to qualifications on the Australian Qualifications Framework (AQF), rather than non-award courses. The transnational quality strategy will be developed in close consultation with States and Territories, providers, industry associations, staff and student representative organisations, and other stakeholders. It is expected that a paper would be provided to the Ministerial Council on Education, Employment, Training and Youth Affairs (MCEETYA) for discussion during 2005.
- xiv. **Comments on and discussion of the issues raised in this paper are welcome.** All stakeholders are encouraged to send written submissions by **20 May 2005**.



1. Consultation

- 1.1 This discussion paper launches an important phase of enhancing Australia's offshore education and training and is one part of a broader consultation process.
- 1.2 Written submissions are welcome. Other consultative activities will be held and will include:
 - the establishment of an Offshore Quality Reference Group; and
 - the scheduling of open discussion sessions, industry meetings, a workshop, and participation in education and training conferences.
- 1.3 Following this extensive consultation, it is anticipated that a national strategy, including improved communication and promotion and a strengthening of the current quality assurance arrangements, will be presented for consideration by the Ministerial Council on Education, Employment, Training and Youth Affairs (MCEETYA) and the Ministerial Council on Vocational Education.¹
- 1.4 The Australian Government invites all interested stakeholders to provide comment on the concepts and issues raised here. In particular, feedback is invited on suitable models and the 'Issues for Consideration'.
- 1.5 Unless you request that your submission be treated confidentially, it will be made publicly available on the AEI website or on request, and authorship will be acknowledged. Details are available at Attachment C.
- 1.6 Please submit your comments in hard-copy or electronically. The deadline for making submissions in relation to the Discussion Paper is **20 May 2005**.

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¹ The establishment of a Ministerial Council on Vocational Education was announced by the Prime Minister on 22 October 2004. Approval from this body will be sought depending on its role and date of commencement.

2. Background

- 2.1 Transnational education and training involves the provision of education and training services in countries other than Australia, and may take many forms including offshore campuses, twinning arrangements and franchises (see box below). Many Australian education and training providers offer their education and training services in this way and so students in Malaysia, for example, may enrol in, study and be awarded a Bachelor or postgraduate degree from an Australian university without ever leaving Kuala Lumpur. Other forms of engagement include students who undertake part of their studies in another country, and part within Australia. Many countries encourage this, to help meet domestic demand and supplement local capacity. Increasingly, delivery by foreign providers is being used by countries seeking to become regional education hubs, such as Singapore and Malaysia.

Definition of Australian Transnational Education

Australian transnational education and training, also known as offshore or cross-border education and training, refers to the delivery and/or assessment of programs/courses by an accredited Australian provider in a country other than Australia, where delivery includes a face-to-face component. The education and/or training activity may lead to an Australian qualification or may be a non-award course, but in either case an accredited/approved/recognised Australian provider is associated with the education/training activity.

As distinct from education and training provided in a purely distance mode, transnational education and training includes a physical presence of instructors offshore, either directly by the Australian provider, or indirectly through a formal agreement with a local institution/organisation. Education and training services delivered offshore may take many different forms, including:

- *Campus wholly owned by an Australian institution;*
- *Courses/programs offered in partnership with local providers;*
- *Twinning arrangements;*
- *Franchising of curricula and/or courseware (where an accredited Australian provider remains an identifiable partner);*
- *Distance education programs that contain a component of face-to-face instruction (by local and/or Australian instructors);*
- *Education and training activities conducted on behalf of an Australian entity (i.e. training tailored for an offshore organisation); and*
- *Any other face-to-face delivery undertaken in the name of an Australian provider.*

- 2.2 It is estimated that approximately one in every four international students in the Australian education and training system is enrolled offshore. By sector:
- In 2003, Australia's universities offered over 1,500 offshore programs, taught wholly or partly through partnership arrangements.² More than 55,000 university students were enrolled in offshore courses.³
 - In 2003, Australian public Vocational Education and Training (VET) providers enrolled 18,300 students offshore, with programs delivered in 24 countries⁴; and
 - In the schools sector, providers issue Australian qualifications to students enrolled offshore, and Australian syllabi are also offered by non-Australian providers under contractual arrangements.
- 2.3 In addition to the school, VET and higher education sectors, international students also have a significant offshore presence in English language study (referred to as English Language Intensive Courses for Overseas Students - ELICOS) and Foundation Programs.
- 2.4 Australia is a leading provider of transnational education partly due to its long history of providing quality distance education programs. Offshore activities are forecast to expand substantially in the coming years as indicated in the Ministerial Statement on International Education, *Engaging the World through Education*.⁵
- 2.5 Australia has a well-established quality assurance system that extends to transnational provision. For example, universities, as well as having their own internal quality assurance mechanisms, are subject to audit every five years by the Australian Universities Quality Agency (AUQA). The audit process includes examination of offshore activities. Public and private Registered Training Organisations (RTOs) in the VET sector are accredited and audited by State and Territory governments, to Australian Quality Training Framework (AQTF) standards. Under the AQTF, offshore courses must be of the same standard as onshore courses. Quality assurance is thus a shared responsibility, with important roles played by providers, the Australian Government, State and Territory Governments, quality assurance agencies and industry associations

² AVCC (2003) *Offshore Programs of Australian Universities: Offshore Programs Conducted Under Formal Agreements between Australian Universities and Overseas Higher Education Institutions or Organisations*. (This figure does not include programs in wholly-owned offshore Australian campuses, unless they are offered as part of a partnership arrangement.) www.avcc.edu.au

³ Statistics on higher education enrolments are accessible at <http://www.dest.gov.au/highered/statinfo.htm>

⁴ NCVER (2003) *Delivery of VET offshore by Public Providers, 2003*. Data does not include private VET providers. In 2004-05, NCVER is conducting a feasibility study for DEST into collecting offshore data from private VET providers. www.ncver.edu.au

⁵ Available at <http://aei.dest.gov.au/AEI/AboutAEI/PoliciesAndPriorities/MinisterialStatement/default.htm>

(for details of all sectors see Attachment A). This discussion paper deals primarily with courses offered under the AQF.

- 2.6 Quality arrangements for each sector seek to promote a culture of continuous improvement, of which a key element is regular self-review. The process of review and enhancement is part of Australia's quality assurance framework, and includes initiatives such as the review of the Australian Quality Training Framework Standards undertaken in 2004, the Offshore Auditing of Higher Education initiative, and recent discussions on ELICOS accreditation, and quality assurance for Foundation Programs.
- 2.7 With the rapid developments in transnational education, quality and quality assurance are the focus of increasing international attention. Many national authorities and international organisations are considering practical steps to quality assure transnational education and training services. The UNESCO/OECD non-binding guidelines on 'Quality Provision in Cross-border Higher Education'⁶ represent one applied approach that is under development. The OECD publication, *Quality and Recognition in Higher Education: The Cross-border Challenge*⁷, underlines the growing importance of offshore education for governments on all continents.
- 2.8 *Comprehensive but complex*: The current Australian system, while robust, is complex. For example, each sector has its own provider registration, course accreditation, quality assurance, reporting and monitoring/audit requirements with a range of parties involved. Each sector also has a different mix of regulatory and non-regulatory activities. These measures vary between the sectors and, in some cases, may also vary within sectors across Australian State and Territory jurisdictions. Where primary responsibility for quality assurance rests with State and Territory Governments, national consistency is facilitated by national frameworks to guide the States and Territories.
- 2.9 *Non-regulatory arrangements* play an important role in Australian quality assurance, in particular in promoting a culture of continuous self-improvement among providers and industry associations. Voluntary codes of practice, such as the Australian Vice-Chancellors' Committee (AVCC) *Code of Practice and Guidelines in the Provision of Education to International Students*, are useful tools and benchmarks for providers and provide an important peer-support function. Effective self-regulatory measures, such as the National English Language Teaching Accreditation Scheme (NEAS) for onshore ELICOS delivery, set industry benchmarks and help providers maintain appropriate standards. They also play a role in assisting students, parents and other stakeholders to make informed choices about providers and courses.

⁶ For further information, see www.oecd.org/edu/internationalisation/guidelines

⁷ OECD (2004) *Quality and Recognition in Higher Education: The Cross-border Challenge*. OECD: Paris.

- 2.10 The complexity of current arrangements can make it difficult for students, overseas governments and other stakeholders to understand them. This is compounded by the lack of a single point of access to information about quality assurance arrangements. While there are already a number of websites providing information on various aspects of Australian quality assurance, qualifications and providers, there is no single point to which overseas stakeholders can be referred. There is clearly scope to improve existing websites to ensure they take offshore provision into account and are sufficiently user-friendly for international audiences. A further issue is limited data. While university data on offshore enrolments is sound and regular data collection for public VET providers has begun, there is no systematic collection of data for other sectors.
- 2.11 To address these challenges and ensure that Australia's offshore quality assurance remains relevant, effective and based on best practice, and is internationally recognized as such, the Australian Government is investing \$10.6 million over four years. A complementary initiative is the Offshore Auditing of Higher Education Providers, for which funding of \$590,000 per year for three years from 2005 was announced in the Higher Education reform package *Our Universities: Backing Australia's Future*.
- 2.12 As part of this, the Australian Government proposes to develop a national strategy for the quality assurance of transnational education and training. The strategy seeks to strengthen the international recognition of Australia as a provider of high quality education and training services. The objectives of the national strategy will be achieved through ensuring that quality assurance arrangements are strong, nationally consistent in application by all Australian authorities, and easily comprehensible. The major focus of this discussion paper is on courses leading to qualifications on the Australian Qualifications Framework (AQF), rather than non-award courses. *A key element that will be promoted is that AQF courses delivered and qualifications obtained offshore are equivalent to those delivered onshore in Australia.*
- 2.13 The transnational quality strategy will thus be pursued through activities in two key areas:
- i. ***Improving communication and promotion*** of Australia's quality framework to all stakeholders, within Australia and internationally; and
 - ii. ***Strengthening of the national quality framework***, which comprises both regulatory and non-regulatory activities.

2.14 In the following sections, three approaches to strengthening the quality framework are suggested; as well as ideas for improving communication and promotion. Principles underpinning the strategy are also proposed.⁸

Transnational education – issue for consideration

Is the suggested definition of transnational education and training suitable and does it include all relevant organisations and offshore delivery arrangements?

⁸ New arrangements for quality in the Vocational Education and Training sector are under development as outlined in the paper *Skilling Australia – New Directions for Vocational Education and Training*, and this will be taken into account.

3 Principles

3.1 The national strategy seeks to clarify, and where possible, to simplify Australia's approach to quality and quality assurance for transnational education and training. The following principles identify the applied elements of the transnational quality strategy, which must:

Principle One: Ensure that Australia's quality assurance framework is **well understood** and **well-regarded** within Australia and internationally.

Principle Two: Make clear to providers and consumers the **accountabilities** in offshore education and training.

Principle Three: Ensure that accreditation and audit functions are undertaken **transparently**.

Principle Four: Ensure **equivalence** between courses/programs offered within Australia and offshore.

3.2 Through these principles, the transnational quality strategy will have the effect of:

- Protecting and strengthening the reputations of bona fide Australian education and training **providers** and by association the Australian system as a whole, in order to protect an important **export** industry;
- Promoting **good practice** in transnational education and training;
- Strengthening Australia's relations with other **governments**; and
- Positioning Australia as the **provider of choice** in the international market.

3.3 The transnational quality strategy will take into account the fundamental differences in the quality assurance systems that are in place in the school, VET, higher education, ELICOS and Foundation Program sectors. While reflecting these differences, and addressing issues particular to each sector, the national strategy will also address quality issues that are common across the sectors.

- 3.4 An important component of the strategy is the capacity for feedback, evaluation and review, enabling it to be adjusted accordingly as required. This is particularly important given the dynamic nature and rapidly changing environment of offshore transnational education.

Principles for the Transnational quality strategy – issue for consideration

Are the four Principles appropriate and adequate for the transnational quality strategy?

4 Strengthening Promotion and Communication

- 4.1 The objectives of strengthening promotion and communication are to:
- i. ensure that stakeholders, particularly other governments, their quality assurance bodies, overseas providers and potential students, have an accurate understanding of the structure and processes of our quality assurance systems and the overall quality of Australian education;
 - ii. ensure that stakeholders (including students, their parents, and employers) are able to identify easily the qualifications and the providers that are quality assured by a reliable authority;
 - iii. ensure all stakeholders have confidence that the quality assurance system works effectively to assure the quality of the courses and qualifications, by ensuring their access to outcomes data arising from quality assurance processes; and
 - iv. provide improved and timely information on students and the courses they are taking offshore, and strengthened exchange and spreading of good practice.
- 4.2 Australia already undertakes significant promotional activities with other governments, quality assurance experts and stakeholders. Every year Australia is host to visiting government and expert delegations interested in learning from Australia's quality assurance arrangements. Australian quality assurance experts – including academics and officials from government and regulatory bodies – are active participants in professional associations and conferences. The Australian Government has a number of information services already in place, including the DEST International Network of offshore offices, the services of the Australian Education Centre system, participation in education fairs and promotional activities offshore, and AEI Online (<http://aei.dest.gov.au/>).
- 4.3 However, more needs to be done. One suggestion has been that DEST provide material to all education sectors which showcases the overall excellence of our system. Questions that are asked by other governments sometimes relate not so much to quality assurance *per se*, but to Australian standards and practices that may not be so widespread in other countries. For example, Australia has long experience with lifelong learning. Its higher education and vocational education and training sectors have significant intakes of mature aged students, many of whom have extensive workforce experience and previous study. Australia has therefore developed sophisticated approaches to mature aged

entry which allow people without formal qualifications entry to courses, and in some cases advance standing, where they have substantial workforce or other relevant study or experience. Many other countries have post-secondary education systems that deal largely with students direct from school, and they often do not understand Australian practices. This could be one focus of a communication strategy.

- 4.4 Part of the communication strategy may also be usefully directed to Australian education and training providers. Australian education provision is flexible – it can be provided part-time, and in modules. Students can also progress rapidly by loading courses and undertaking summer classes. In their advertising to students, some providers emphasise the possibility of rapid progression without emphasizing the quality and high standards of Australian education provision. This has at times undermined Australia’s image as a quality provider.
- 4.5 A critical element appears to be improving access to information. Some possibilities are:
- improving existing websites to ensure they take offshore provision into account and are sufficiently user-friendly for international audiences;
 - presenting accreditation information in a standard format across a range of websites, with links to associated State and Territory jurisdictions;
 - repackaging information into a single website or database;
 - Inclusion on websites of direct points of contact for queries, and for student and other stakeholder complaints; and
 - A future step may be to provide a centralised listing of all offshore programs provided by accredited Australian providers.
- 4.6 Accessible data and information on the extent and nature of offshore operations is necessary to the ongoing planning, development, enhancement and promotion of quality assurance. For Foundation Programs, ELICOS courses and courses offered by private VET providers⁹, there is currently no publicly available information on offshore student numbers. Regardless of the model chosen a priority for action would be the establishment of more effective offshore data collection. This would require cooperative action between State and Territory authorities, industry associations, providers and DEST.

⁹ In 2004-05, NCVET is conducting a feasibility study for DEST into collecting offshore data from private VET providers.

Communication of Offshore Quality Assurance Framework – issues for consideration

What aspects of Australia’s quality standards and its assurance system should be emphasised in a communication strategy to governments and other stakeholders? Is there a need to explain Australia’s approach to recognition of prior learning and flexible delivery?

Should a ‘one-stop-shop’ web portal be established to promote Australia’s quality assurance framework for onshore and offshore provision?

Should such a website also enable stakeholders to check the offshore courses and providers that are registered/accredited by an Australian authority? What mechanisms should be put in place to ensure that any online list of accredited offshore programs is regularly updated and user-friendly?

What role should the State/Territory and Australian Governments, as well as industry, play in the facilitation of communication strategy options?

Offshore Data Collection – issues for consideration

What steps could be taken to develop a nationally consistent process for the collection and subsequent dissemination of data on the offshore operations of each sector?

What would be the best means of compiling collected information and data on the offshore operations of providers into a publicly available national database?

5 Strengthening the Quality Framework

- 5.1 Australia's international recognition and reputation as a provider of high quality services would be strengthened by a transparent, robust, nationally consistent and easily understood quality framework for the provision of transnational education and training, based on a set of national principles.
- 5.2 To enact the principles of the transnational quality strategy, three potential models for the national framework are presented:
 - a. Under the **Augmented Current Model**, existing arrangements and lines of responsibility for offshore quality assurance would be maintained and strengthened;
 - b. Under an **Advisory Board Model**, a joint industry-government Board would develop standards, codify best practice and establish protocols in relation to offshore activities. Functions such as accreditation and audit would remain with the current quality assurance authorities; and
 - c. Under a **National Authority Model**, governments would remain responsible for quality assurance arrangements, however, a National Authority would be established to which the existing State and Territory regulatory bodies would delegate quality assurance functions for offshore provision.
- 5.3 These three models are presented to stimulate discussion. Proposals for other models or combinations of models are invited. It is possible that the best model may be a hybrid, with aspects of different models applying for each sector.

Model 1: Augmented Current Model

- 5.4 Under existing arrangements, each State and Territory Government plays a major role in the quality assurance of offshore delivery. State and Territory Governments have primary responsibility for quality assurance in the schools, VET and non-university higher education sectors. Under the Augmented Current Model, existing arrangements would be maintained – each State and Territory Government would continue to hold its current responsibilities, as would the Australian Universities Quality Agency (AUQA). The proposed National VET Quality Agency, if established, would potentially fulfil the role currently undertaken by State and Territory Government regulatory authorities.

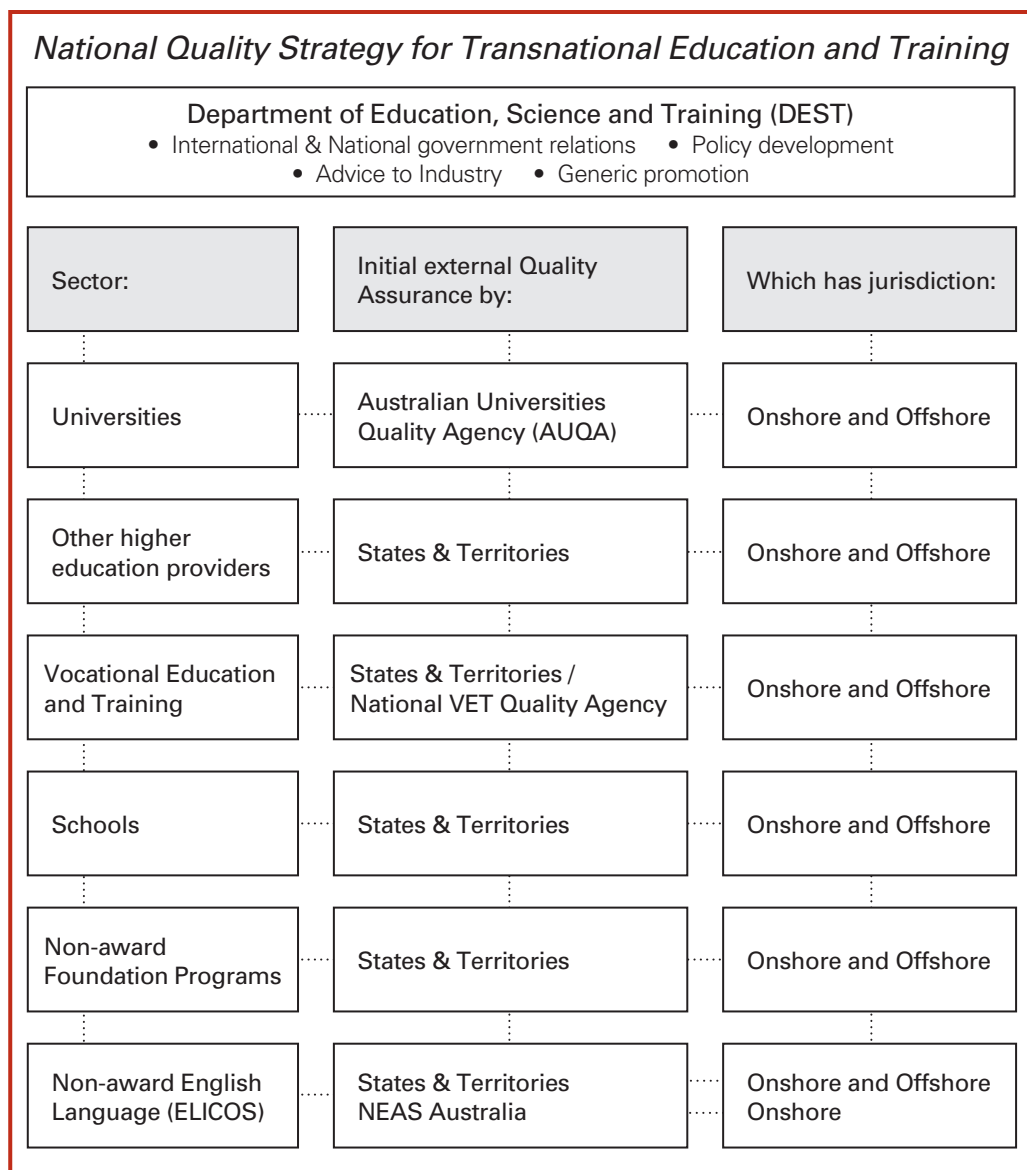
- 5.5 In essence, the Augmented Current Model would strengthen the status quo by promoting industry-led initiatives, inter-governmental agreement and efficiencies. Activities would be undertaken to improve promotion and communication of Australia's quality assurance framework as discussed above, as well as to strengthen regulatory arrangements and support non-regulatory activities.
- 5.6 Some activities already underway provide an indication of ways the national quality framework can be strengthened under the Augmented Current Model. For example:
- Universities were assisted to develop and share good practice through grants to the value of \$1.35 million, provided by DEST. Fifteen projects have been funded that will benefit the entire sector, and project outcomes will be shared at a DEST-sponsored offshore quality conference, anticipated to be held in late 2005 or 2006;
 - Enhanced Offshore Auditing of Higher Education Providers is being examined, for which the Australian Government has allocated \$590,000 per year for three years;
 - In 2005, the Australian Vice-Chancellors' Committee (AVCC) will release its updated Code of Practice in the Provision of Education to International Students, which has been reviewed to include offshore students;
 - The Australian Quality Training Framework (AQTF) has been revised to reflect current inter-governmental considerations, including the growth in transnational operations among VET providers;
 - ELICOS and Foundation Program providers held extensive discussions in 2004 to clarify, amongst other issues, quality assurance systems for each of these sectors in Australia and transnationally. While Australian governments have participated, the emphasis has been upon assisting each sector to identify the best solution for itself. Discussions are continuing; and
 - In 2005, DEST will provide support to the VET sector to highlight and promote good practice in the quality assurance of offshore delivery.¹⁰
- 5.7 The Augmented Current Model, therefore, would seek to:
- *Facilitate the dialogue* between providers, sectors and Australian jurisdictions about how the current arrangements

¹⁰ This initiative is currently under development.

could more effectively achieve the principles of the transnational quality strategy.

- *Increase national consistency* in the implementation of quality assurance arrangements within each sector across State and Territory jurisdictions to improve international understanding of the system and aid its promotion.
 - *Clarify the responsibilities* of State and Territory authorities and providers in relation to quality assuring offshore operations, and steps would be taken towards ensuring appropriate resources are allocated for effective quality assurance.
- 5.8 The Augmented Current Model would strengthen State and Territory quality assurance functions in relation to offshore education and training activities. All offshore delivery under the AQF would be undertaken by or on behalf of accredited Australian education and training providers; these Australian providers (with the exception of universities) would be audited by State/Territory authorities or other recognised authorities at the time of initial accreditation, and at least every five years thereafter.
- 5.9 Industry associations, quality assurance agencies and DEST would promote self-regulatory and voluntary activities for continuous quality improvement. Providers in all sectors would apply continuous improvement by identifying and applying good practice in their offshore delivery and quality assurance
- 5.10 Figure 1 indicates the relationship between the education and training sectors in Australia, the related quality assurance authority, and the extent of jurisdiction. In this model, each of the quality assurance authorities has jurisdiction over both onshore and offshore activities.

Figure 1: Outline of Augmented Current Model



5.11 The following is a brief summary of how the Augmented Current Model of offshore quality assurance could apply to each of the sectors. Details of existing quality assurance mechanisms for each sector are provided in Attachment A.

Figure 2: Strengthening the Quality Framework: Implications of the Augmented Current Model

Sector	Implications of Augmented Current Model
Higher Education: Universities ¹¹	<ul style="list-style-type: none"> • AUQA: Audits, including offshore operations, continue to be conducted by AUQA on an institutional basis; audit reports continue to be made public • Complaints: current requirements and arrangements for handling complaints remain in place • Good practice: Universities supported in working towards good practice by AUQA, industry associations and DEST
Higher Education: Other providers	<ul style="list-style-type: none"> • Accreditation: Function continues to be undertaken by each State and Territory (and by the Australian Government for external territories); continues to be mandatory for courses leading to Australian Qualifications Framework (AQF) qualifications, whether offered onshore or offshore • Auditing: For Higher Education Providers approved under the Higher Education Support ACT 2003 (HESA), auditing arrangements will apply as established by registration requirements • AUQA: continues to audit State and Territory accrediting authorities • Complaints: current requirements and arrangements for handling complaints remain in place • Data: DEST and/or State/Territory accreditation authorities work with providers to collect and share data on provider offshore operations. Applicable to all education sectors • Good practice: DEST and/or States/Territories provide support to providers as required, such as good practice guides. Applicable to all education sectors

¹¹ For the purposes of this Discussion Paper, the term 'universities' includes a further four institutions that are not universities but which have the same authorisation and are subject to the same quality assurance arrangements as Australian universities. These four institutions are the Australian Film Television and Radio School, Australian Maritime College, Batchelor Institute of Indigenous Tertiary Education, and Melbourne College of Divinity.

<p>Vocational Education and Training</p>	<ul style="list-style-type: none"> • Registration, accreditation and audit functions: continue to be undertaken by each State and Territory, or potentially by proposed National VET Quality Agency, as agreed under the Australian Quality Training Framework (AQTF); continues to be mandatory for the delivery of AQF qualifications, whether offered onshore or offshore; Nationally consistent principles for offshore auditing to be developed by States and Territories or the proposed VET National Quality Agency, such as criteria to determine when an offshore audit will be conducted • Complaints: current requirements and arrangements for handling complaints remain in place • Good practice: for registration, accreditation and audit procedures in relation to offshore activities to be developed by States and Territories; Development of good practice for offshore delivery to be facilitated by DEST and/or States/Territories and/or industry associations
<p>Schools</p>	<ul style="list-style-type: none"> • Accreditation: function continues to be undertaken by each State and Territory; remains mandatory for courses leading to AQF qualifications whether offered onshore or offshore • Complaints: Current requirements and arrangements remain in place
<p>ELICOS</p>	<ul style="list-style-type: none"> • Quality assurance: where ELICOS courses are offered as award courses, relevant sectoral quality assurance arrangements continue to apply. (The Australian Education Senior Officials Committee (AESOC) is investigating national standards for ELICOS and the assessment of ELICOS and its providers) • Support from DEST and/or States and Territories for self-regulatory measures to be extended to offshore delivery • Complaints: current requirements and arrangements remain in place
<p>Foundation Programs</p>	<ul style="list-style-type: none"> • Quality assurance: where Foundation Programs are offered as award courses, relevant sectoral quality assurance arrangements continue to apply (DEST is assisting Industry and State/Territory governments to seek agreement on a nationally consistent approach to offshore quality) • Complaints: current requirements and arrangements remain in place

Augmented Current Model – issues for consideration

Do the current arrangements for quality assurance provide sufficient public confidence in the quality of Australian providers operating offshore? Which aspects of current arrangements are particularly effective? Are there any measures which should be reviewed?

Should State and Territory accreditation agencies develop common offshore quality assurance processes within each sector? If so, how should good practice be determined?

Which entities are best placed to conduct offshore audits – State/Territory Governments; government agencies in other countries; sub-contracted agencies? What steps should be taken to maximise their effectiveness – streamlined processes; national consistency; professional development for auditors?

Should an independent mechanism to address stakeholder complaints on offshore operations be established? If so, what body or bodies should administer the complaints mechanism?

Vocational Education and Training

Should a quality assurance process be put in place for non-award courses?

Schools

The Senior Secondary Certificate of Education (SSCE) is quality assured under the AQF. Should a mechanism be established to quality assure offshore activities at the pre-SSCE level?

ELICOS

Given the continuing growth of offshore English language delivery by Australian providers, with much of this delivery provided as non-award courses, should a framework be established to assure the quality of offshore delivery?

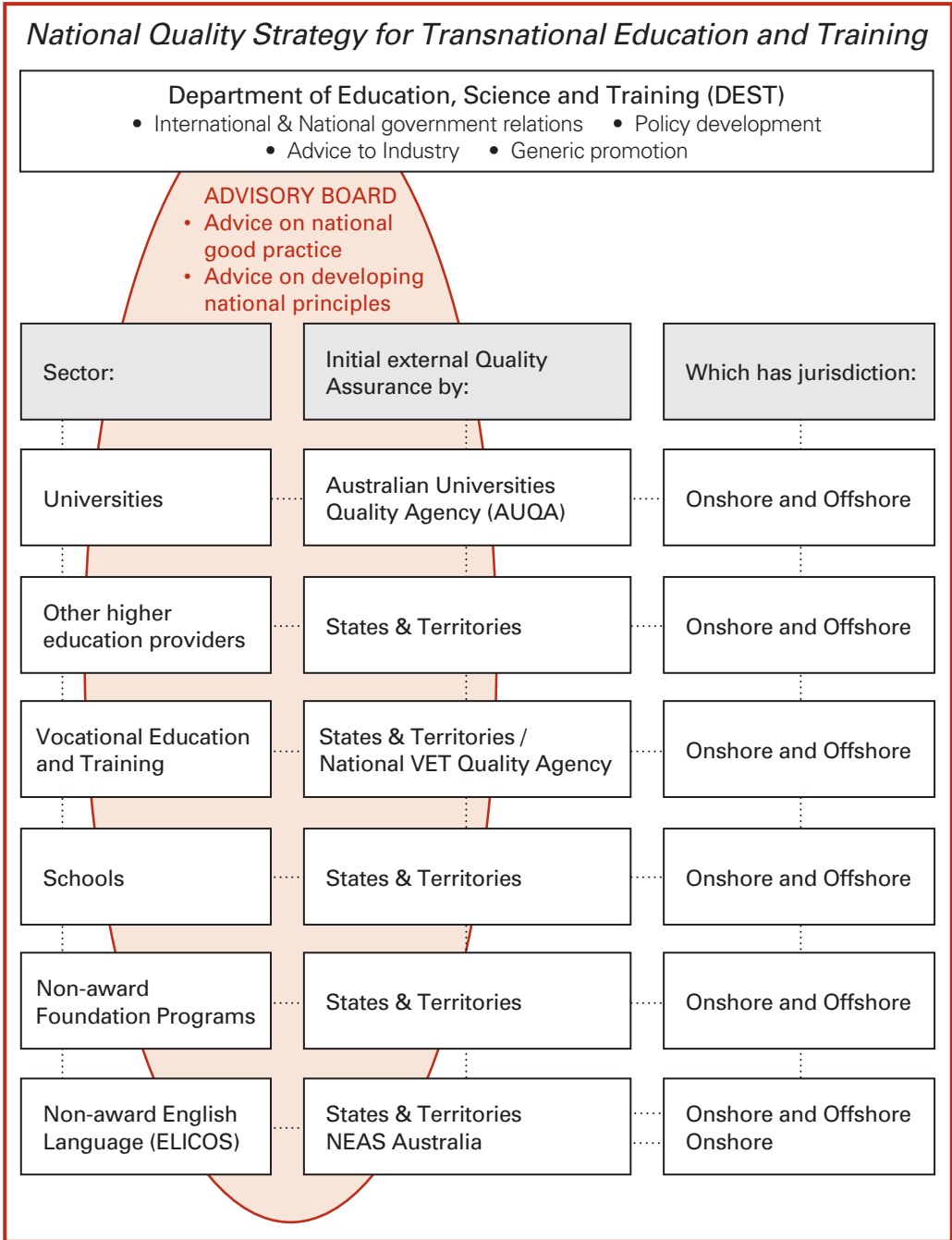
Foundation Programs

Taking into account the multi-sectoral and often non-award nature of Foundation Program provision, should a common mechanism be put in place to assure the quality and consistency of offshore operations?

Model 2: Advisory Board Model

- 5.12 The Advisory Board Model shares many characteristics with the Augmented Current Model. The primary difference would be the creation of a joint industry-government Board, whose role would be to advise the education and training sectors, providers, and all Australian governments on best practice approaches to offshore quality for all sectors. Membership could comprise representatives from each of the sectors, all quality assurance agencies and all Australian governments. One possibility is for the Advisory Board to report to MCEETYA.
- 5.13 With a multi-sectoral and inter-governmental composition, some key roles for the Advisory Board could include:
- Analyses of good practice by Australian and international providers, leading to the establishment of protocols and principles in relation to offshore activities which would complement existing arrangements;
 - Examination of complaints handling systems for each sector, and identification of best practice;
 - Advising on mechanisms for compiling comprehensive statistics on offshore activity;
 - Identifying innovative approaches to the promotion and communication of Australia's quality framework; and
 - Advising on processes to improve national consistencies within sectors, as well as cross-sectoral synergies.
- 5.14 The Advisory Board would thus provide advice which would facilitate national agreement(s) on the registration, accreditation and audit of offshore operations. This would assist the development of a nationally consistent approach as applicable within each sector. The Advisory Board would provide advice to industry associations, quality assurance agencies and DEST to promote self-regulatory and voluntary activities for continuous quality improvement. It would give impetus to providers in all sectors to apply continuous improvement by identifying and applying good practice in their offshore delivery and quality assurance.
- 5.15 The Advisory Board would give visible impetus to the national strategy. However, being advisory, its limitations are similar to those of the Augmented Current Model in that the speed of change and the strengthening current arrangements may be relatively slow, given the large number of parties involved.
- 5.16 Figure 4 indicates the possible relationship between the education and training sectors in Australia, the related quality assurance authority, and the Advisory Board.

Figure 3: Outline of Advisory Board Model



5.17 Figure 4 provides a brief summary of how the Advisory Board Model of transnational quality assurance could apply to each of the sectors. As noted, further details of existing quality assurance mechanisms for each sector are provided in Attachment A.

Figure 4: Strengthening the National Quality Framework: Implications of the Advisory Board Model

Sector	Implications of Advisory Board Model
Higher Education: Universities	<ul style="list-style-type: none"> • Audits, including offshore operations, continue to be conducted by AUQA on an institutional basis; audit reports continue to be made public • Advisory Board: <ul style="list-style-type: none"> ○ examines current requirements and arrangements for handling complaints, and suggests enhancements if appropriate; and ○ identifies best practice through consultation with AUQA, industry bodies and universities and promotes and facilitates its implementation
Higher Education: Other providers	<ul style="list-style-type: none"> • Accreditation continues to be mandatory for courses leading to AQF qualifications, whether offered onshore or offshore • Accreditation function continues to be undertaken by each State and Territory (and by the Australian Government for external territories) • Advisory Board: <ul style="list-style-type: none"> ○ makes recommendations to develop national principles and improve national consistency for accrediting offshore courses; and ○ examines current requirements and arrangements for handling complaints, and suggests enhancements if appropriate • For those Higher Education Providers approved under HESA, auditing arrangements will apply as established by registration requirements • AUQA continues to audit State/Territory accrediting authorities • DEST and/or State/Territory accreditation authorities work with providers to collect and share data on provider offshore operations • With advice from Advisory Board, DEST and/or States/Territories provide support to providers as required, such as good practice guides

<p>Vocational Education and Training</p>	<ul style="list-style-type: none"> • AQTF Registration, accreditation and audit functions continue to be mandatory for courses leading to AQF qualifications, whether offered onshore or offshore • Registration, accreditation and audit functions continue to be undertaken by each State and Territory, or by proposed National VET Quality Agency • Advisory Board: <ul style="list-style-type: none"> ○ examines current requirements and arrangements for handling complaints, and suggests enhancements if appropriate; and ○ works with States and Territories/proposed National VET Quality Agency to develop national good practice and national principles for registration, accreditation and audit procedures in relation to offshore activities • DEST and/or State/Territory accreditation authorities work with providers to collect and share data on provider offshore operations. Applicable across all sectors • Under advice from the Advisory Board, providers supported in working towards good practice by States and Territories, industry associations and DEST. Applicable across all sectors
<p>Schools</p>	<ul style="list-style-type: none"> • Accreditation for courses leading to AQF qualifications remains mandatory, whether offered onshore or offshore • Accreditation function continues to be undertaken by each State and Territory • Advisory Board: <ul style="list-style-type: none"> ○ makes recommendations to develop national principles and improve national consistency for accrediting offshore courses; and ○ examines current requirements and arrangements for handling complaints, and suggests enhancements if appropriate
<p>ELICOS</p>	<ul style="list-style-type: none"> • Where ELICOS courses are offered as award courses, relevant sectoral quality assurance arrangements continue to apply (AESOC is investigating national standards for ELICOS and the assessment of ELICOS and its providers.) • Advisory Board: <ul style="list-style-type: none"> ○ may be able to provide advice on areas where strengthening would be beneficial; and ○ examines current requirements and arrangements for handling complaints, and suggests enhancements if appropriate

Foundation Programs

- Where **Foundation Programs** are offered as award courses, relevant sectoral quality assurance arrangements continue to apply (DEST is assisting Industry and State/Territory governments to seek agreement on a nationally consistent approach to offshore quality.) Advisory Board may be able to provide advice on areas where strengthening would be beneficial
- **Advisory Board** examines current requirements and arrangements for handling complaints, and suggests enhancements if appropriate

Advisory Board Model – issues for consideration

Would the role and composition of the Advisory Board enable it to be an effective mechanism to strengthen the quality of transnational education?

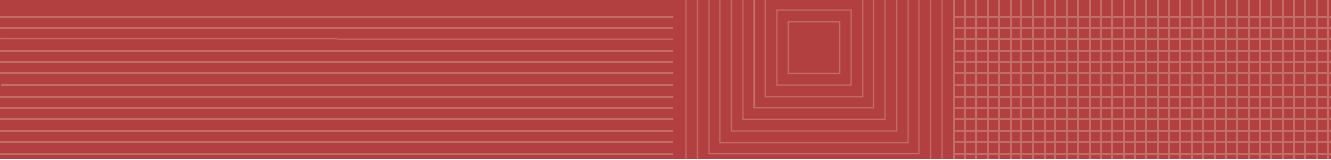
Should the Advisory Board be accountable to MCEETYA?

How could the Advisory Board be resourced: joint funding by the Australian Government and States/Territories; joint government-industry funding; cost recovery model?

Should the Advisory Board address stakeholder complaints on offshore operations, including the capacity to conduct investigations of complaints?

Model 3: National Authority Model

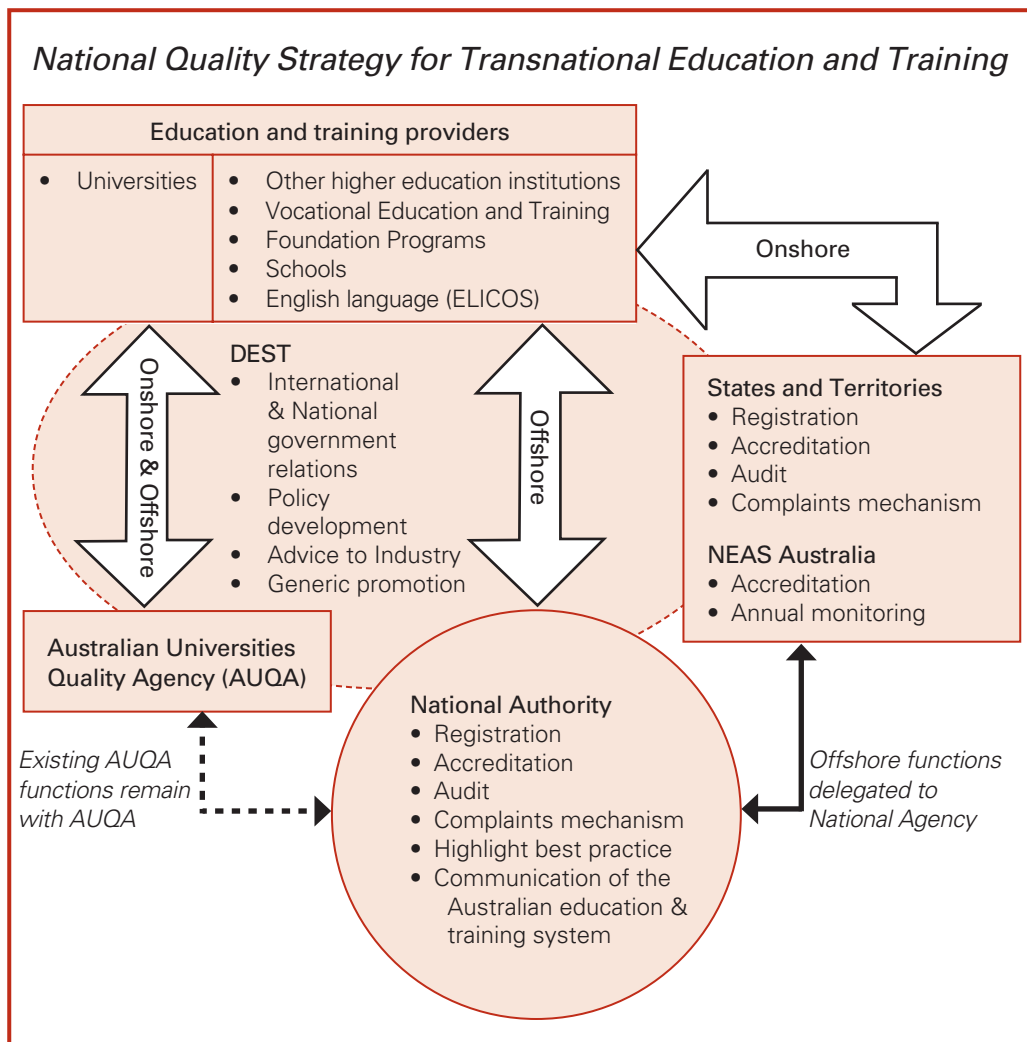
- 5.18 A National Authority Model would build upon the quality arrangements already in place in each sector. Accreditation and audit functions of courses and providers onshore (i.e. within Australia) would continue to be the responsibility of each State and Territory accrediting agency and associated quality assurance bodies. Under agreement, a National Authority would be established, to which the State and Territory accrediting agencies would delegate accreditation, registration and quality assurance functions for offshore operations. Given the strong national and international role played by AUQA in higher education, AUQA could remain independent but linked to the National Authority, providing advice and information about the higher education sector onshore and offshore as a result of its audits. If the proposed National VET Quality Agency is established it may also remain an independent entity working in cooperation with the National Authority, or it could potentially take on the role of the National Authority.
- 5.19 The creation of a National Authority would provide a positive response to feedback from overseas governments and other international stakeholders that Australian quality assurance is seen as complex, and that liaison and understanding is complicated by the absence of a single body with which to consult. A National Authority would express to national and international stakeholders a clear and recognisable point of responsibility for offshore quality assurance and could play a role in handling complaints from offshore students. This would assist Australian liaison with overseas governments, quality assurance agencies and students by clarifying the accountabilities in offshore education and training.
- 5.20 The National Authority would facilitate the promotion and communication of Australia's quality framework and its accountabilities; coordinate expertise on issues including accreditation and audit on a sector-by-sector basis; facilitate improved national consistency of offshore audits and accreditation processes within sectors and ensure quality assurance activities are undertaken in a resource-effective manner. The National Authority would also contribute to the identification of good practice, and play an active role in communicating the quality and strengths of Australia's education and training system. This activity would assist in ensuring that Australia's quality assurance framework is better understood and well-regarded within Australia and internationally. It would also assist the recognition of the equivalence in standards and learning outcomes between courses/programs offered within Australia and offshore.
- 5.21 The National Authority could be authorised to collect data on provider offshore activities, perhaps linked to registration and/or



accreditation processes, in all sectors for which it plays a quality assurance role. This activity would be undertaken on behalf of each State and Territory, and would ensure greater consistency in the data collected, thus improving data integrity and its usefulness for policy development in each sector.

- 5.22 The establishment of a National Authority would not involve abolition of the different approaches to quality between the sectors. Nor would it represent the introduction of an additional layer of regulation. Rather, the delegation of offshore quality functions to the National Authority would represent a re-alignment of existing quality assurance processes to address the logistical challenges and reduce the costs involved in implementing quality assurance functions for offshore operations.
- 5.23 The exact nature of the re-alignments and offshore quality assurance delegation may vary by sector. Such jurisdictional issues would be subject to considerable consultation with relevant stakeholders.
- 5.24 Figure 7 provides a schematic view of the National Authority Model.

Figure 5: Outline of National Authority Model



5.25 The following is a brief summary of how the National Authority Model of offshore quality assurance would apply to each of the sectors.

Figure 6: Implications of National Authority Model, by sector

Sector	Implications of National Authority Model
Higher Education: Universities	<ul style="list-style-type: none"> • Audits, including offshore operations, continue to be conducted by AUQA on an institutional basis; audit reports continue to be made public • National Authority provides independent review (ombudsman role) for complaints after provider internal procedures have been exhausted • Universities supported in working towards good practice by AUQA, industry associations and DEST, with coordination and/or support from the National Authority
Higher Education: Other providers	<ul style="list-style-type: none"> • Accreditation continues to be mandatory for courses leading to AQF qualifications, whether offered onshore or offshore • Accreditation and/or audit function for offshore courses undertaken by National Authority on behalf of each State and Territory (and by the Australian Government for external territories) • For those Higher Education Providers approved under HESA, auditing arrangements will apply as established by registration requirements • AUQA continues to audit accrediting authorities • National Authority provides independent review (ombudsman role) for complaints after provider internal procedures have been exhausted. Applicable to all sectors • National Authority works with providers/industry associations to collect and share data on provider offshore operations. Applicable to all sectors • Providers supported in working towards good practice by National Authority, with involvement from industry associations, AUQA and DEST as required. Applicable to all education sectors

Vocational Education and Training	<ul style="list-style-type: none"> • AQTF Registration, accreditation and audit functions continue to be mandatory for courses leading to AQF qualifications, whether offered onshore or offshore • Audit functions for offshore operations are undertaken by National Authority or proposed National VET Quality Agency on behalf of each State and Territory • National Authority facilitates State and Territory agreement and/or identifies good practice for registration, accreditation and audit procedures • National Authority facilitates State and Territory agreement and/or proposes principles for offshore audit, such as criteria to determine when an offshore audit will be conducted
Schools	<ul style="list-style-type: none"> • Accreditation for courses leading to AQF qualifications remain mandatory, whether offered onshore or offshore • Accreditation function for offshore courses is undertaken by National Authority on behalf of each State and Territory
ELICOS	<ul style="list-style-type: none"> • Where ELICOS courses are offered as award courses, relevant sectoral quality assurance arrangements continue to apply (AESOC is investigating national standards for ELICOS and the assessment of ELICOS and its providers) • Accreditation and audit functions undertaken by National Authority on behalf of each State and Territory authority, authorised public providers and NEAS • National Authority supports and promotes self-regulatory measures and their application to offshore delivery
Foundation Programs	<ul style="list-style-type: none"> • Where Foundation Programs are offered as award courses, relevant sectoral quality assurance arrangements continue to apply • For Foundation Programs managed by universities, accreditation and audit functions undertaken by AUQA; for Foundation Programs managed by all other providers accreditation and audit functions undertaken by National Authority • DEST is assisting Industry and State/Territory governments to seek agreement to develop a nationally consistent approach to offshore quality • National Authority plays a role in developing QA arrangements and supporting providers for good practice

National Authority Model – issues for consideration

Would the role of the National Authority enable it to be an effective mechanism to strengthen the quality of transnational education?

Under what authority should a National Authority be established?

How could the National Authority be resourced: joint funding by the Australian Government and States/Territories; joint government-industry funding; cost recovery model?

Should the National Authority address stakeholder complaints on offshore operations, including the capacity to conduct investigations of complaints?

Vocational Education and Training

Should the National Authority have quality assurance oversight of non-award courses?

Schools

Should the National Authority have quality assurance oversight of offshore activities at the pre-SSCE as well as SSCE level?

ELICOS

Should the National Authority have quality assurance oversight of offshore ELICOS operations (award and non-award courses)? Would it be preferable for the National Authority to delegate this role to NEAS Australia?

Foundation Programs

Taking into account the multi-sectoral nature of Foundation Program provision, should the National Authority have a developmental role in assuring the quality and consistency of offshore operations?

Attachment A

Australia's Quality Assurance Measures

- A.1 Australia's State and Territory Governments play a significant role in the quality assurance of all education and training sectors. State and Territory Government agencies have responsibility for the accreditation of qualifications and/or the registration of providers in the Schools, VET and non-university higher education sectors, and for Foundation and ELICOS programs.
- A.2 National frameworks have been agreed by the Australian, State and Territory Governments for the Schools, VET and Higher Education sectors:
- a. For the Schools sector, State and Territory Governments and the Australian Government have developed nationally consistent goals for school education (the 1999 Adelaide Declaration) and measures of student performance (National Report on Schooling series¹²) through MCEETYA. The organisation of Australasian Curriculum Assessment and Certification Authorities (ACACA) has developed a common set of Guidelines for Assessment Quality and Equity.¹³
 - b. For the VET sector, through the Australian Quality Training Framework (AQTF), State and Territory Governments have developed nationally consistent standards for the accreditation of Registered Training Organisations (RTOs), including mutual recognition of providers and AQF qualifications.¹⁴
 - c. For the Higher Education sector, the National Protocols for Higher Education Approval Processes have been adopted by MCEETYA and are implemented under State and Territory legislation.¹⁵
- A.3 For onshore delivery to international students, State and Territory Governments are responsible for approving providers and courses in all sectors for registration on the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) under the *Educational Services for Overseas Students (ESOS) Act 2000*. All educational providers offering courses to international students in Australia must also comply with the National Code of Practice

¹² For the text of the 1999 *Adelaide Declaration on National Goals for Schooling in the Twenty-First Century* and the annual *National Report on Schooling*, refer to the MCEETYA website <http://www.mceetya.edu.au/index.htm>

¹³ For information on ACACA and the Guidelines, see the ACACA website <http://www.acaca.org.au/>

¹⁴ ANTA (2001) *Australian Quality Training Framework: Standards for Registered Training Organisations*; and *Standards for State and Territory registering/course accrediting bodies*. Melbourne: ANTA. www.anta.gov.au

¹⁵ The text of the National Protocols for Higher Education Approval Processes is available on the DEST website at http://www.dest.gov.au/highered/mceetya_cop.htm.

for Registration Authorities and Providers of Education and Training to Overseas Students (the National Code).¹⁶ These instruments cover a multiplicity of issues related to the provision of education and training services for international students within Australia, including standards on student support services and educational resources, ethical marketing provisions, and a tuition assurance scheme.

A.4 The following sections summarise existing offshore quality assurance arrangements for each sector.

(i) Higher Education – Universities

A.5 Australia's universities are established by State, Territory or Commonwealth legislation and are authorised by law to set standards for qualifications. There are a small number of other institutions that have the same authorisation and are subject to the same quality assurance arrangements as universities. These institutions and all universities are listed on the Australian Qualifications Framework Register of Recognised Education Institutions and Authorised Accreditation Authorities in Australia (known as the 'AQF Register').¹⁷ The title 'university' is protected under the Australian Corporations Act 2001, and may only be used by education providers that have been formally approved by a higher education recognition authority.¹⁸

A.6 In addition to 40 universities, Australia also has four other higher education institutions that are subject to the same quality assurance arrangements as universities. These are:

- Australian Film Television and Radio School;
- Australian Maritime College;
- Batchelor Institute of Indigenous Tertiary Education; and
- Melbourne College of Divinity.

A.7 In 1995, the Australian Vice-Chancellors' Committee (AVCC) proposed a voluntary *Code of Ethical Practice in the Offshore Provision of Education and Educational Services by Australian Higher Education Institutions* for its members. In 1998, this was integrated with a voluntary code on onshore activities, and in 2002 the AVCC released the updated AVCC Code of Practice in the Provision of Education to International Students.¹⁹ The AVCC Code

¹⁶ For information on the ESOS Act, the National Code and CRICOS, please refer to <http://www.dest.gov.au/esos/default.htm>

¹⁷ The AQF is accessible at <http://www.aqf.edu.au/register.htm>

¹⁸ See 'Assuring quality in Australian higher education'. <http://www.dest.gov.au/highered/quality/commonwealth.htm>

¹⁹ Accessible at http://www.avcc.edu.au/news/public_statements/publications/AVCC_Code_2001final.pdf.

sits within a broader statement – *Universities and their Students: Principles for the Provision of Education by Australian Universities*.²⁰ The Code is currently undergoing review and a new version is anticipated to be available in 2005.

- A.8 A number of quality assurance mechanisms for offshore activities have been in place for some time. The Ministerial Council on Education, Employment, Training and Youth Affairs (MCEETYA) – comprising State, Territory, and Australian Government Ministers – endorsed the National Protocols for Higher Education Approval Processes ('the National Protocols') in March 2000. The National Protocols are supported by State and Territory legislation, and outline processes for establishing a new university in Australia and for foreign universities to operate in Australia. The National Protocols also require non-university higher education institutions to obtain accreditation in order to offer higher education courses, and outline quality assurance arrangements for delivery in distant locations and through partner institutions. A review of the Protocols has recently been undertaken to ensure they remain at the level of international best practice in underpinning a high quality, diverse and competitive Australian higher education sector.²¹
- A.9 Under Protocol 4, responsibility for the quality assurance of courses offered offshore rests with the Australian institution. Universities are expected to ensure that any overseas programs maintain standards at least equivalent to those provided in Australia.
- A.10 Under the National Protocols, the university carries full responsibility for all aspects of program delivery, including:
- Quality and standards comparable to those on other campus(es) of the institution;
 - Teaching by staff qualified at a level comparable to those on other campus(es) of the institution;
 - Resources and facilities adequate for the delivery of the course; and
 - Adequate measures to protect the welfare of students.²²
- A.11 The quality assurance of offshore activities is subject to audit by the Australian Universities Quality Agency (AUQA), an independent, not-for-profit national agency that audits and reports on quality assurance in Australian higher education. Each university is audited by AUQA on a five yearly cycle.

²⁰ Accessible at http://www.avcc.edu.au/news/public_statements/publications/Principles_final_Dec02.pdf.

²¹ Details available at http://www.dest.gov.au/highered/pubs/nat_protocols_approval/higher_education.htm.

²² See MCEETYA's National Protocols for Higher Education Approval Processes. http://www.detya.gov.au/highered/mceetya_cop.htm#p4

- A.12 AUQA audits provide public assurance of the quality of providers and encourage a culture of quality and continuous improvement. All audit reports are made publicly available on the AUQA website.²³ Institutional audits cover all academic activities conducted by the institution, including any offshore operations. AUQA has included a number of offshore visits in its audits to date.
- A.13 In 2004, DEST allocated an additional \$100,000 for AUQA to extend its offshore auditing capacity. From 2005, a further \$590,000 over three years has been set aside to enhance AUQA's offshore auditing activities under the Offshore Auditing of Higher Education initiative. A DEST Discussion Paper was released in June 2004, including a call for submissions on the best way to utilise this new allocation. A joint Government-industry reference group was established in July 2004 to consider the responses to the Discussion Paper and is in the process of determining how best to progress this initiative.²⁴
- A.14 DEST has allocated an additional \$1.35 million for universities to undertake projects that will further protect the quality and integrity of their offshore operations while contributing to the development of good practice models for quality assurance of offshore delivery. Fifteen projects have been funded, and are due to be completed by September 2005.²⁵

(ii) Higher education – Non-universities

- A.15 Non-university higher education providers must obtain accreditation from a State/Territory accrediting agency in order to offer Australian Qualifications Framework (AQF) higher education courses/qualifications. Government accrediting agencies for the higher education sector are listed on the AQF Register of Recognised Education Institutions and Authorised Accreditation Authorities in Australia.²⁶
- A.16 There are more than 100 non-university higher education providers in Australia. Examples include the Institute of Chartered Accountants in Australia, the Royal Australian College of General Practitioners, the Australasian Conference Association Limited, and the Australian College of Theology.
- A.17 Through the MCEETYA National Protocols, a nationally consistent approach to accreditation was adopted. Under Protocol 3, non-university higher education providers must demonstrate capacity

²³ See AUQA website www.auqa.edu.au

²⁴ Further information available at <http://www.dest.gov.au/highered/quality/offshore/auditing.htm>

²⁵ Further information available at <http://www.dest.gov.au/highered/quality/offshore/projects.htm>

²⁶ Accessible at <http://www.aqf.edu.au/register.htm>

to successfully deliver the course in order to gain accreditation. Providers may then obtain fixed term accreditation (up to five years) for each of their courses from the relevant accrediting agency.²⁷

- A.18 AUQA audits the State and Territory higher education accrediting agencies, and as such has an indirect quality assurance insight into the operations of the non-university higher education providers in Australia. There are variations in the degree to which State and Territory accrediting agencies take into account the offshore operations of non-university higher education providers in their accreditation processes.

(iii) Vocational Education and Training

- A.19 Each State and Territory is responsible for the registration and auditing of VET sector providers to deliver Training Packages and for the accreditation of AQF VET courses. Only VET providers that have been registered and accredited by State/Territory authorities can be accredited to offer AQF courses. These Registered Training Organisations may be registered to provide both training and assessment services, or for assessment only services. All Registered Training Organisations are listed on the National Training Information Service website.²⁸
- A.20 The Australian Quality Training Framework (AQTF) is a national mechanism for quality assuring the VET sector across the States and Territories. The AQTF was developed by the National Training Quality Council of the Australian National Training Authority (ANTA) Board. Developed in conjunction with industry, States and Territories and the Australian Government, the AQTF was endorsed by Australian Ministers for vocational education and training in June 2001.
- A.21 The key objective of the AQTF is to provide the basis for a nationally consistent, high quality VET system. Combining internal and external audits, the AQTF Standards provide a robust system of quality assurance in training and assessment. Under Section 1.2(v), an RTO must “provide details, upon the request of the State and Territory registering body that has registered it, of all operations within its scope of registration including operations...outside Australia”. Offshore operations may be subject to audit by the relevant registering body.²⁹

²⁷ MCEETYA National Protocols for Higher Education Approval Processes, Protocol 3. www.detya.gov.au/highered/mceetya_cop.htm

²⁸ Accessible at www.ntis.gov.au

²⁹ ANTA (2001) Australian Quality Training Framework: Standards for Registered Training Organisations, p. 3. www.anta.gov.au

- A.22 Under the AQTF standards, all RTOs are audited at the time of initial registration, within twelve months of initial registration and prior to renewal of the 5-year registration period, to ensure continuing compliance with the AQTF Standards for Registered Training Organisations.
- A.23 For audits, an RTO is required to provide information about all its operations, including any online and offshore operations. While the AQTF Standards make allowance for offshore audit visits, the authority to conduct such visits must come from State/Territory legislation. To date South Australian and Western Australian registering bodies have conducted offshore audit visits, for initial registration purposes.³⁰
- A.24 Educational delivery includes distance and online education, partnership arrangements, the establishment of offshore campuses, and short-term visits to the offshore site by Australia-based instructors.³¹
- A.25 Of the 32 public VET providers active offshore in 2002, just over half delivered award courses only, a third delivered both award and non-award courses, and 13 per cent delivered non-award courses exclusively. For both award and non-award courses, classroom-based instruction was the predominant mode of delivery (93 per cent of providers). For award courses, the majority (75 per cent) of delivery was provided in conjunction with local providers. For non-award, more than 90 per cent of instruction was conducted through short-term visits by Australia-based instructors.
- A.26 In 2004-05, NCVET is conducting a feasibility study for DEST into collecting offshore data from private VET providers.

(iv) Schools

- A.27 State and Territory Government agencies are responsible for the registration and accreditation of schools to offer the AQF School sector qualification, the Senior Secondary Certificate of Education (SSCE). The SSCE is known by a range of local titles across the States and Territories.
- A.28 Quality assurance processes for the SSCE vary between the States and Territories, but generally include external examinations, external moderation, marker monitoring and a range of checks and cross-checks on the reliability and validity of students' results. Quality assurance is managed by the State/Territory Boards of

³⁰ Moran, L. and Ryan, Y. (2004) *The Australian Quality Training Framework and the Globalisation of Training Markets*. Melbourne: ANTA. <http://www.anta.gov.au/publication.asp?qsID=639>

³¹ DEST (2004) *Delivery of VET offshore by Public Providers, 2003*. <http://aei.dest.gov.au/AEI/Shop/Products/Publications/Publication279>

Studies, the Government departments responsible for school education, and associated bodies.

- A.29 Australian school curricula and qualifications are also offered to students outside Australia. There are three main mechanisms:
- An Australian school, with existing accreditation, establishes a campus outside Australia.
 - An educational provider outside Australia obtains accreditation from an Australian State/Territory to offer the SSCE or pre-SSCE courses. This may be an International School, or a local educational provider.
 - An Australian educational provider or State authority authorises an international provider to use their school curricula.
- A.30 States and Territories have different mechanisms to quality assure offshore school operations. In a number of States, the SSCE culminates in a set of jurisdiction-wide standardised examinations, with external marking. Onshore and offshore students are assessed in the same manner, and in a number of jurisdictions the Tertiary Entrance Rank or University Admission Index (and other equivalent terms) of each student is published.
- A.31 In other State/Territory jurisdictions, some or all of student performance is calculated via continuous assessment. For onshore and offshore students, moderation and check-marking systems are in place, to assure an equivalency of assessment levels.
- A.32 In some jurisdictions, Boards of Studies make offshore visits to assess facilities, teacher practice, student support mechanisms and other related educational and management elements.

(v) English Language Courses

- A.33 English language courses (also referred to as ELICOS – English Language Intensive Courses for Overseas Students) are offered by providers in the higher education, VET and Schools sectors. Specialised English language colleges also provide ELICOS services. ELICOS is a key area in Australian education, as international students often undertake English language courses as a precursor to studies in the other sectors. English language delivery is anticipated to undergo considerable growth offshore in the next few years.

A.34 As many English language courses do not lead to an AQF qualification, the ELICOS sector is covered by different regulatory arrangements. There are three ways in which an ELICOS course may be accredited:

- *NEAS accreditation.* NEAS Australia is an industry based, self-funding, autonomous system, operating as a national accreditation scheme for English Language Teaching centres and Adult Migrant English Programs.³²
- *Public provider accreditation.* Universities and public VET providers may accredit their own ELICOS courses.
- *State/Territory accreditation.* The ELICOS provider submits documentation to a State/Territory accrediting body for review and approval as a Registered Training Organisation.

A.35 The majority of Australian ELICOS providers have NEAS accreditation. Given its recognition in the marketplace, even universities, public RTOs and providers with State/Territory accreditation have found it useful to gain NEAS accreditation. After gaining accreditation, all courses that will be offered to international students must be registered and approved by State/Territory accrediting bodies for CRICOS registration under the ESOS Act.

A.36 NEAS accreditation is not currently applicable offshore. However, NEAS Australia has been exploring the feasibility of offering its accreditation scheme for offshore delivery. DEST hosted an ELICOS Forum in mid-October 2004, together with industry associations and State and Territory Governments, to discuss ELICOS quality assurance and accreditation. DEST will be assisting the State and Territory Governments and industry with the process of developing national principles for ELICOS accreditation and national standards for ELICOS providers and non-award courses.

(vi) Foundation Programs

A.37 Foundation Programs take many forms, but in general they provide a bridge between secondary and tertiary education, and offer an alternative means for international students to access post-school institutions. Foundation Programs are offered by providers in the School, VET, ELICOS and higher education sectors.

A.38 It is estimated that approximately eighty Foundation Program providers offer more than 300 Foundation Programs in Australia.³³ A small number of providers offer their programs offshore.

³² For further information, see the NEAS Australia website <http://www.neasaustralia.com/>
³³ CRICOS data, August 2004. <http://cricos.dest.gov.au/>

- A.39 Most Foundation Programs are registered on CRICOS as non-award courses. Given the generally non-award status of Foundation Programs, quality assurance therefore tends to relate to sectoral affiliation. For example, a Foundation Program offered by an Australian university will be quality assured via internal quality assurance processes. In the VET sector, Foundation Programs are frequently registered as award courses at the Certificate III or IV level, and must comply with the State/Territory accreditation mechanism for VET provision.
- A.40 DEST hosted a Foundation Program Workshop in September 2004, which brought together representative associations, State and Territory authorities, and other key stakeholders to consider the accreditation of Foundation Programs and other issues, including quality assurance for offshore delivery.

Attachment B

List of Acronyms

ANTA	Australian National Training Authority
ANTA MINCO	Australian National Training Authority Ministerial Council
AQF	Australian Qualifications Framework
AQTF	Australian Quality Training Framework
AUQA	Australian Universities Quality Agency
AVCC	Australian Vice-Chancellors' Committee
CRICOS	Commonwealth Register of Institutions and Courses for Overseas Students
DEST	Department of Education, Science and Training
DFAT	Department of Foreign Affairs and Trade
DIMIA	Department of Immigration and Multicultural and Indigenous Affairs
ELICOS	English Language Intensive Course for Overseas Students
HESA	Higher Education Support ACT 2003
MCEETYA	Ministerial Council on Education, Employment, Training and Youth Affairs
NEAS Australia	National English Language Teaching Accreditation Scheme Limited Australia
NTIS	National Training Information Service
OECD	Organisation for Economic Cooperation and Development
RTO	Registered Training Organisation
UNESCO	United Nations Educational, Scientific and Cultural Organisation
VET	Vocational education and training

Glossary

A number of key terms and their definitions are provided below. As terminology can vary in usage and meaning between the sectors, some sector-specific definitions are provided.

- Some higher education sector definitions have been obtained from the AUQA Glossary (<http://www.auqa.edu.au/tools/glossary/index.shtml>).
- VET sector definitions are sourced from the AQTF *Standards for State and Territory Registering/Course Accrediting Bodies* and *Standards for Registered Training Organisations*.

Accreditation

A process to determine whether an institution or programme qualifies for a certain status; or the actual conferring of that status. The status may have implications for the institution itself (eg. permission to operate) and/or its students (eg. eligibility for grants) and/or its graduates (eg. qualified for certain employment).

VET sector: The formal recognition of a course by the State or Territory course accrediting body in line with the *Standards for State and Territory Registering/Course Accrediting Bodies*.

Higher Education sector: The formal recognition of a course by the State or Territory accreditation authority in line with the *National Protocols for Higher Education Approval Processes*.

Audit	<p>A systematic, independent and documented process for obtaining evidence to determine whether the activities and related outcomes of an education and/or training provider meet an appropriate level of quality.</p> <p><i>VET sector:</i> A systematic, independent and documented process for obtaining evidence to determine whether the activities and related outcomes of a training organisation comply, or continue to comply, with the <i>Standards for Registered Training Organisations</i>.</p> <p><i>Higher Education sector:</i> A systematic, independent and documented process for obtaining evidence to determine whether the activities and related outcomes of a higher education institution comply or continue to comply with the National Protocols for Higher Education Approval Processes. The determination is whether:</p> <ol style="list-style-type: none"> i. the planned arrangements (that is, the quality control and assurance procedures) are suitable to achieve the objectives; ii. the actual quality activities conform to the planned arrangements; and iii. the arrangements are being implemented effectively. (Standards Australia)
Quality	<p>'Quality' refers to <i>objective standards</i>, which may be defined in a variety of ways. Common conceptions include:</p> <ul style="list-style-type: none"> • quality as excellence; • quality as fitness for purpose; • quality as exceeding minimum standards; and • quality as value for money. <p>There is no universally agreed conception of 'quality' in use, with stakeholders and quality authorities applying differing definitions to specific contexts.</p> <p><i>VET sector:</i> Under Australian Quality Training Framework arrangements, the level of satisfaction with and effectiveness of vocational education and training organisations, their products and services, established through conformity with the requirements set by clients and stakeholders.</p>
Quality assurance agency/ authority	<p>For the purposes of this Discussion Paper, the terms 'quality assurance agency' and 'quality assurance authority' are used interchangeably and refer to the bodies authorised to undertake quality assurance functions such as registration, accreditation and audit.</p>

Registration	<p>Formal approval and recognition of an organisation to offer certain education and/or training services, which require the organisation to be subject to regulation.</p> <p><i>VET sector:</i> The formal approval and recognition of a training organisation, by a State or Territory registering body, in accordance with the <i>Standards for Registered Training Organisations</i> and the <i>Standards for State and Territory Registering/Course Accrediting Bodies</i>.</p> <p><i>Scope of registration</i> in relation to a training organisation means the identification of the particular services that the registered training organisation can provide. The scope of operation of a registered training organisation is also defined by specific Australian Qualifications Framework qualifications or competencies within Training Package/s and/or accredited courses.</p>
Regulatory	<p>For the purposes of this Discussion Paper, 'regulatory' refers to quality assurance arrangements required by and enacted under regulation or law.</p>

Attachment C

Publication of Submissions

- i. Submissions will be published electronically on the AEI and/or DEST website. Individuals may request not to have their details made public.
- ii. A report analysing the submissions will be prepared by DEST and submissions or parts of submissions may be included in the report. In such cases, the submissions (or parts of submissions) will be referred to by number. If you make a submission on behalf of an organisation and do not want the organisation to be identified, please indicate this on the cover page.
- iii. You should be aware that DEST may be required to release the details of any submission (or parts of it) by the operation of law (for example, if required to do so by Parliament). The Department can therefore give no undertakings that your submission (or parts of it) will never be made publicly available. If you have any concerns about this, the Department suggests that you obtain your own legal advice.
- iv. The Department will not consider nor publish any submission that, in the Department's opinion, contains material that is or may be defamatory.
- v. Accompanying any submission or part of a submission that the Department makes publicly available or includes in any report analysing the submissions, the Department may include a statement to the effect that the Department does not necessarily agree with the submission (or part of the submission) and the views expressed in it are those of the author(s).
- vi. The Department may use, reproduce and adapt any submission in whole or in part for any purpose described in this Attachment (the "Department's Rights"). Each individual and organisation making a submission must ensure that the Department's Rights are not in conflict with (or that all relevant consents have been obtained in relation to) any right of any person, including copyright, moral rights (as defined in the *Copyright Act 1968*) and any right to control the use or disclosure of information.



