

**ACPET response to**  
**the Higher Education Standards Panel's advice on the impacts of professional accreditation**  
**in higher education**  
**April 2018**

## **Introduction**

ACPET welcomes the opportunity to respond to the Higher Education Standards Panel's (HESP's) advice to the Minister for Education and Training on professional accreditation in higher education.

Professional accreditation is a matter that impacts many of ACPET's higher education members. They deliver a broad spectrum of programs across most fields of education. Professional accreditation can be a key to greater recognition by industry and students in a landscape dominated by the large, publicly-funded universities. The relationships with the professional bodies, in the main, also help ensure providers maintain strong links with, and relevance to, the industries that employ course graduates.

There are, however, some necessary reforms to enhance these relationships. The HESP's remit to consider options that reduce the burden on providers is particularly relevant for independent higher education providers. As noted in ACPET's submission to the PhillipsKPA report, *Professional Accreditation - Mapping the territory*, most independent providers do not have Self-Accrediting Authority status with TEQSA. This means their courses need to be assessed externally not only by the regulator but also the relevant professional accreditation bodies.

As the HESP comments in its advice to the Minister, there is often duplication of the requirements for course accreditation and professional accreditation. For smaller providers the impact of this duplication of effort, time and resources can be particularly significant. Equally, advice from members indicates there is sometimes quite divergent 'expert' perspectives on the requirements to satisfy these duplicated assessments.

ACPET welcomes the HESP's finding that the regulatory and financial burden of professional accreditation is significant. For smaller independent providers this burden can be particularly acute.

The feedback from members to inform input to the PhillipsKPA report also highlighted the power 'imbalance' some providers experience in their endeavours to obtain professional accreditation. The sense that independent providers need additional, or particular, 'attention' from professional accreditation bodies is a concern that needs attention in the HESP's proposed reforms. It needs to be clear that independent providers are assessed rigorously against the Higher Education Standards Framework (HESF) and efforts to reduce duplication should be consistent and 'real' for all providers.

ACPET has been actively engaged with Professions Australia to develop a set of principles in line with those developed with Universities Australia. This work should provide a solid contribution to support the HESP's recommendations for reform.

## **Response to recommendations**

### *Recommendation 1*

ACPET supports the HESP's goal that professional accreditation assessments should be limited to matters that are profession specific, rather than issues already assured by TEQSA. This is a key element of the principles document being developed by Professions Australia with independent providers.

The challenge, identified by the HESP, is the voluntary nature of the principles document and seeking to include those smaller, new or perhaps 'less mainstream' professional accreditation bodies that may not see the benefits of supporting a voluntary code of practice.

ACPET supports the HESP's approach of seeking to build on the goodwill and work done between providers and Professions Australia whilst ensuring there is comprehensive coverage across all professional accreditation bodies. The development of the proposed code of practice in consultation with stakeholders should assist its 'acceptance' and on-the-ground implementation.

It will be important there is clarity around what are "areas of professional competence or practice" that will remain the remit of professional accreditation bodies in the code of practice and supporting resources.

Consideration will also need to be given to the mechanisms to monitor compliance with the code and avenues available to mediate and respond to the inevitable 'misinterpretations' of professional and regulatory matters. There need to be mechanisms to review implementation and consider necessary adjustments.

While the details of these mechanisms are yet to be worked out, a priority will be to ensure there is sufficient 'clout' to achieve the necessary changes. The legislated option should not be discounted if these mechanisms are not considered sufficiently robust to achieve the necessary changes.

### *Recommendation 2*

The recommendation to build the capacity of professional accreditation bodies is supported. As noted above, there will need to be a focus on ensuring these bodies have clarity around their remit of limiting accreditation to areas not included in the HESF. TEQSA should have a key role in building the understanding of the HESF and its provider regulatory arrangements.

While there is an imperative for closer collaboration between TEQSA and the professional accreditation bodies to clarify and harmonise regulatory and professional accreditation approaches, it is less clear that TEQSA should be deeply involved in, or lead, broader developmental or capacity building role for professional accreditation bodies. Noting the lengthening timeframes to conduct its existing 'core business', ACPET is concerned with proposals for TEQSA to take on a broader role in supporting or leading professional accreditation.

The broader responsibility for building the capacity of the sector should be led by Professions Australia and its members.

Likewise, the HESP's support for broader reform of professional accreditation in the face of significant changes to occupations and industries as a result, for example, of technological advances needs to be considered in partnership with professional accreditation bodies.

Noting the preferred option is for government to legislate a code of practice, it would seem reasonable for some support to be provided to the professional accreditation sector, to assist implementation. This support could be extended to advance the broader reforms identified by the HESP.

### *Recommendation 3*

The conduct of a forum that brings together relevant stakeholders to discuss the future of professional work and the implications for profession accreditation is supported, but should be 'tested' with the professional accreditation sector. It is likely the larger and more prominent professional bodies have considered the future of work and accreditation, at least within their industries, and would be well placed to inform the shape and focus of a forum.