



Australian Government

Tertiary Education Quality and Standards Agency

TEQSA submission to
the consultation paper:
*Implementing Suburban
University Study Hubs*

October 2023

TEQSA

TEQSA would like to thank the Department of Education for the invitation to respond to the *Consultation Paper on Implementing Suburban University Study Hubs* (the consultation paper).

Under the [Tertiary Education Quality and Standards Agency Act 2011](#) (TEQSA Act), TEQSA is responsible for protecting and enhancing the diversity of Australia's higher education sector. Accordingly, TEQSA supports initiatives aimed at encouraging under-represented cohorts, including those who are First Nations students, first in their family to attend higher education, students living with disability, students with work or caring responsibilities, and students from low-socioeconomic backgrounds.

TEQSA's response to the consultation paper focuses on regulatory oversight. Specifically, we encourage the Department of Education to consider the:

- mechanisms for quality assurance of study hubs
- opportunities to minimise regulatory complexity for operators of study hubs
- accountability and management of risks regarding student wellbeing.

Quality assurance of study hubs

To ensure study hubs continue to provide the expected quality of support and services expected by communities, consideration may need to be given to how quality will be measured and maintained.

Under existing frameworks, TEQSA does not have a direct role in regulating entities like study hubs because they are not registered providers of higher education (providers) under the TEQSA Act.

A study hub would fall within TEQSA's regulatory scope if the study hub:

- makes representations to offer a higher education award or a course of study (which it currently would not be permitted to do unless registered as a provider)
- has partnered with a provider to deliver part or all of a course of study (rather than student attending the study hub to complete their course online or by distance with the provider).

If a study hub partnered with a provider to deliver a course, the partnering provider would be responsible for ensuring the delivery of the course remained compliant with the [Higher Education Standards Framework \(Threshold Standards\) 2021](#) (Threshold Standards). This means the provider would need to provide the study hub with oversight on the quality of delivery of the course and associated support. This model of delivery may be useful in mitigating concerns about quality assurance.

Considering the current mechanisms for quality assurance, we encourage the Department of Education to consider what mechanisms may be necessary to ensure study hubs provide the quality of service expected.

Opportunities to minimise regulatory complexity for operators of study hubs

The consultation paper suggests potential operators of study hubs may include:

- community-led organisations
- university or TAFE/VET providers
- joint ventures or consortiums.

Given this wide variety of potential kinds of operator of study hubs, the resulting regulatory environment may not be easy to navigate.

This may be particularly challenging if study hubs partner with both providers and registered training organisations, attracting obligations from both the VET and higher education sectors.

We suggest the Department of Education turn its mind to opportunities to clarify and simplify the regulatory environment for study hubs.

Accountability and managing risks to student wellbeing

TEQSA recommends, irrespective of who operates a study hub, that arrangements be put in place to ensure risks to student wellbeing are appropriately monitored and managed.

For example, the operator of a study hub could be required to put in place appropriate policies and procedures for the prevention, management, and response to risks to student wellbeing, including sexual harm.

While providers already have obligations concerning student wellbeing and safety under the Threshold Standards that would apply to study hubs, other potential operators entering the space may not be subject to the same obligations. The Department should therefore give careful consideration to how operators of study hubs will meet public expectations regarding student wellbeing and safety.

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