Third Party Arrangements

Regulatory Risk Framework

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Source of information used	Federal Register of Legislation - Higher Education Standards Framework (Threshold Standards) 2021 Guidance note: Delivery with other parties | Tertiary Education Quality and Standards Agency Transnational education (TNE) toolkit How to apply for TEQSA to assess a third-party agreement | Tertiary Education Quality and Standards Agency	
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1. Purpose

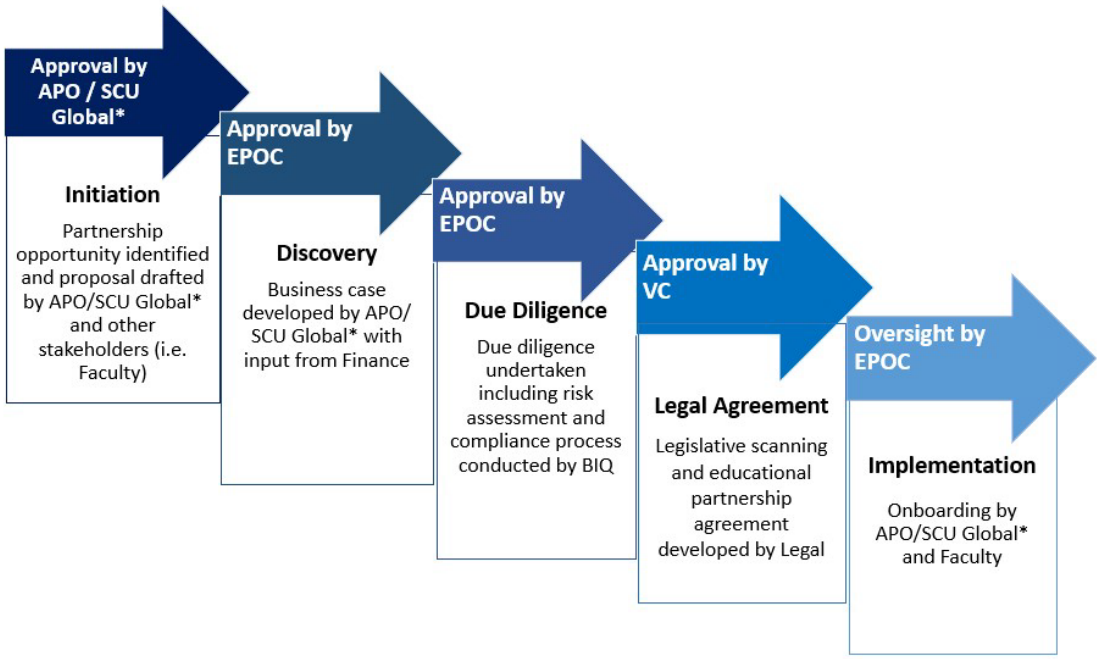
This document provides a range of considerations aimed at bolstering and informing third party arrangements (TPA) that Southern Cross University (SCU) may enter into, to ensure *Higher Education Standards Framework (Threshold Standards) 2021* (HES Framework), standards are demonstrably met, monitored and risks relating to TPAs mitigated through stringent control measures.

The University aims to enter into and maintain rewarding partnerships that are beneficial to staff, students and the University. This is achieved by maintaining a focus on academic quality and quality assurance, student experience and staff expertise. At all times, and as articulated in the steps in this document, we adopt a rigorous assessment and ongoing monitoring of the regulatory environment, financial profile and capacity and capability of our partner organisations.

2. Regulatory Risk Framework

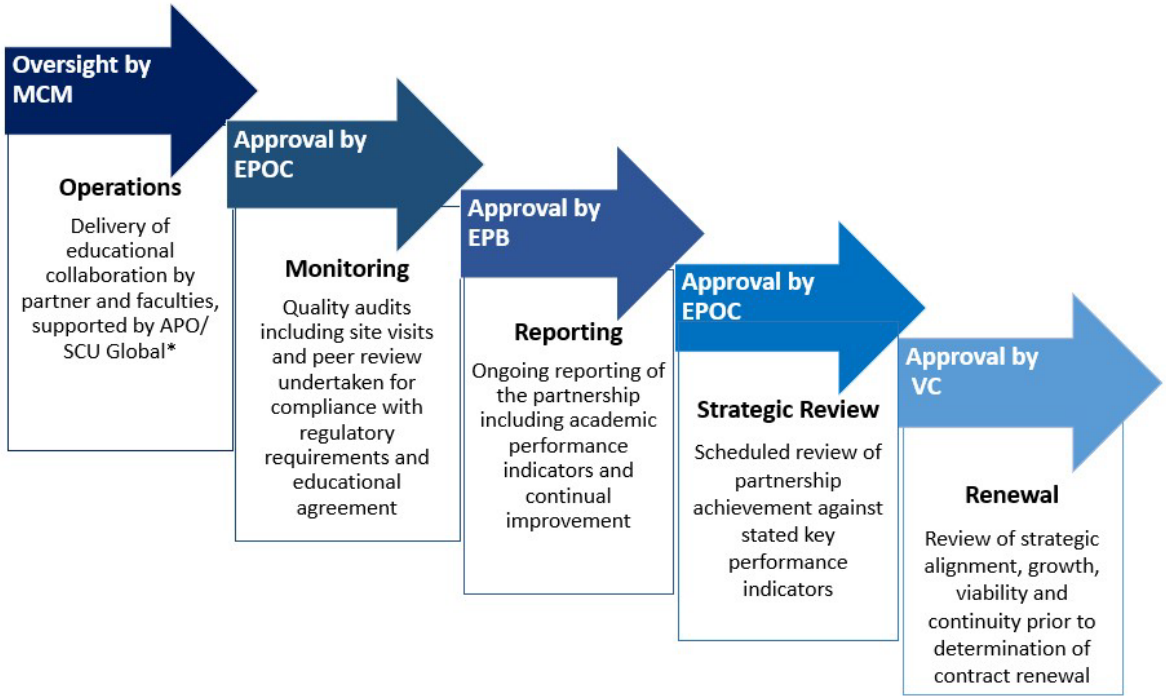
The University's approach to ensuring regulatory alignment and mitigating regulatory risk related to TPAs occurs throughout the life-cycle of a partnership including the establishment process (initiation, discovery, due diligence, legal agreement, implementation and onboarding); and maintenance process (monitoring and reporting, strategic review; and renewal). The steps are detailed at 5. TPA Regulatory Accountability Matrix and only occur once concept is endorsed through the Educational Partnerships Oversight Committee.

Workflow: Establishment of third-party educational collaboration



* SCU Global is Executive lead for proposed transnational educational partnerships; APO is Executive lead for proposed onshore educational partnerships

Workflow: Maintenance of third-party educational collaboration



* SCU Global is Executive lead for established transnational educational partnerships; APO is Executive lead for established onshore educational partnerships

3. The Higher Education Standards Framework (HESF) and TEQSA

Direct reference to third party arrangements in the HESF is restricted to standard 5.4, Delivery with Other Parties. There are a range of corporate and academic governance standards that require consideration when establishing TPA arrangements including Transnational Education (TNE) in addition to standards governing educational capacity. This is detailed in the table below.

Table 1 | Key HESF clauses relevant to TPA

Standard	Element
5.4 Delivery with Other Parties	2. When a course of study, any parts of a course of study, or research training are delivered through arrangements with another party(ies), whether in Australia or overseas, the registered higher education provider remains accountable for the course of study and verifies continuing compliance of the course of study with the standards in the Higher Education Standards Framework that relate to the specific arrangement.
Corporate and Academic Governance	
6.1 Corporate governance	1. There is a formally constituted governing body, which includes independent members, that exercises competent governance oversight of and is accountable for all of the higher education provider's operations in or from Australia, including accountability for the award of

Standard	Element
	higher education qualifications, for continuing to meet the requirements of the Higher Education Standards Framework and for the provider's representation of itself.
	4. The governing body takes steps to develop and maintain an institutional environment in which freedom of speech and academic freedom are upheld and protected, students and staff are treated equitably, the wellbeing of students and staff is fostered, informed decision making by students is supported and students have opportunities to participate in the deliberative and decision making processes of the higher education provider.
6.2 Corporate Monitoring and Accountability	a. the governing body and the entity comply with the requirements of the legislation under which the provider is established, recognised or incorporated, any other legislative requirements and the entity's constitution or equivalent
	b. the provider's future directions in higher education have been determined, realistic performance targets have been established, progress against targets is monitored and action is taken to correct underperformance
	c. the financial position, financial performance and cash flows of the entity are monitored regularly and understood, financial reporting is materially accurate, financial management meets Australian accounting standards, effective financial safeguards and controls are operating and financial statements are audited independently by a qualified auditor against Australian accounting and auditing standards
	e. risks to higher education operations have been identified and material risks are being managed and mitigated effectively
	h. qualifications are awarded legitimately
	i. there are credible business continuity plans…
	j. the occurrence and nature of formal complaints, allegations of misconduct, breaches of academic or research integrity and critical incidents are monitored and action is taken to address underlying causes,
6.3 Academic governance	1. Processes and structures are established and responsibilities are assigned that collectively: a. achieve effective academic oversight of the quality of teaching, learning, research and research training
	b. set and monitor institutional benchmarks for academic quality and outcomes
	c. establish and maintain academic leadership at an institutional level, consistent with the types and levels of higher education offered, and
	d. provide competent advice to the corporate governing body and management on academic matters, including advice on academic outcomes, policies and practices.
4.1 Research	4.1.1 Research and its associated activities are conducted in accordance with a research policy framework that is designed to achieve:

Standard	Element
	c. successful management of research partnerships
Capacity and Capability	
1.3 Orientation and Progression	1. Successful transition into courses of study is achieved through orientation programs that are tailored to the needs of student cohorts and include specific consideration for international students adjusting to living and studying in Australia.
	Specific strategies support transition, including: a. assessing the needs and preparedness of individual students and cohorts
	b. undertaking early assessment or review that provides formative feedback on academic progress and is able to identify needs for additional support, and
	c. providing access to informed advice and timely referral to academic or other support.
	4. Processes that identify students at risk of unsatisfactory progress and provide specific support are implemented across all courses of study.
2.1 Facilities and Infrastructure	1. Facilities, including facilities where external placements are undertaken, are fit for their educational and research purposes, and accommodate the numbers and educational and research activities of the students and staff who use them.
	2. Secure access to electronic information and adequate electronic communication services is available continuously (allowing for reasonable outages for maintenance) to students and staff during periods of authorised access, except for locations and circumstances that are not under the direct control of the provider.
	3. The learning environment, whether physical, virtual or blended, and associated learning activities support academic interactions among students outside of formal teaching.
2.2 Diversity and Equity	2.2.3 Participation, progress, and completion by identified student subgroups are monitored and the findings are used to inform admission policies and improvement of teaching, learning and support strategies for those subgroups.
2.3 Wellbeing and Safety	1. All students are advised of the actions they can take, the staff they may contact and the support services that are accessible if their personal circumstances are having an adverse effect on their education.
	2. Timely, accurate advice on access to personal support services is available, including for access to emergency services, health services, counselling, legal advice, advocacy, and accommodation and welfare services.
	3. The nature and extent of support services that are available for students are informed by the needs of student cohorts, including mental health, disability and wellbeing needs.

Standard	Element
	4. A safe environment is promoted and fostered, including by advising students and staff on actions they can take to enhance safety and security on campus and online.
3.2 Staffing	1. The staffing complement for each course of study is sufficient to meet the educational, academic support and administrative needs of student cohorts undertaking the course.
	2. The academic staffing profile for each course of study provides the level and extent of academic oversight and teaching capacity needed to lead students in intellectual inquiry suited to the nature and level of expected learning outcomes.
	3. Staff with responsibilities for academic oversight and those with teaching and supervisory roles in courses or units of study are equipped for their roles, including having: a. knowledge of contemporary developments in the discipline or field, which is informed by continuing scholarship or research or advances in practice b. skills in contemporary teaching, learning and assessment principles relevant to the discipline, their role, modes of delivery and the needs of particular student cohorts, and c. a qualification in a relevant discipline at least one level higher than is awarded for the course of study, or equivalent relevant academic or professional or practice-based experience and expertise, except for staff supervising doctoral degrees having a doctoral degree or equivalent research experience.
	4. Teachers who teach specialised components of a course of study, such as experienced practitioners and teachers undergoing training, who may not fully meet the standard for knowledge, skills and qualification or experience required for teaching or supervision (3.2.3) have their teaching guided and overseen by staff who meet the standard.
	5. Teaching staff are accessible to students seeking individual assistance with their studies, at a level consistent with the learning needs of the student cohort.
3.3 Learning Resources and Educational Support	1. The learning resources, such as library collections and services, creative works, notes, laboratory facilities, studio sessions, simulations and software, that are specified or recommended for a course of study, relate directly to the learning outcomes, are up to date and, where supplied as part of a course of study, are accessible when needed by students.
	2. Where learning resources are part of an electronic learning management system, all users have timely access to the system and training is available in use of the system.
	3. Access to learning resources does not present unexpected barriers, costs or technology requirements for students, including for students with special needs and those who study off campus.

Standard	Element
	4. Students have access to learning support services that are consistent with the requirements of their course of study, their mode of study and the learning needs of student cohorts, including arrangements for supporting and maintaining contact with students who are off campus.
7.1 Representation	1. Representation of the higher education provider, its educational offerings and charges, whether directly or through agents or other parties, is accurate and not misleading.

To assist determine the applicability of the HESF in relation to TNE arrangements, and how to apply the HESF, TEQSA released a Transnational Education Toolkit[1] (TNE Toolkit) in 2022. This provides definitions and a range of considerations for Australian higher education providers, including universities.
This is considered in the next section.

4. Transnational Education (TNE)

There are three main types of Transnational Education arrangements that the University enters into. TEQSA defines these three main TNE arrangements as:

Articulation arrangements

Articulation arrangements are those between two institutions that allow students to undertake part of their studies in their home country (offshore) followed by an equivalent period of study in Australia to complete the requirements of a single award. Most commonly, articulation arrangements are delivered as 2 years at the home campus plus 2 years at the host campus in Australia (TEQSA, 2022, TNE Toolkit p. 27)

Third party arrangements

Where a higher education institution has, or intends to have, aspects of a course of study carried out by a partner, agent or third-party arrangement, these arrangements may include:

- *Partnerships with other institutions, higher education institutions, or entities*
- *The formation of joint ventures or special purpose companies*
- *Sub-contracting of services*
- *Franchising arrangements* (TEQSA, 2022, TNE Toolkit p. 27)

Joint Awards

TEQSA defines joint awards as those that 'involve a single course of study arranged and delivered jointly by two or more institutions that leads to the award of a single qualification that is recognised within the Australian Qualifications Framework and is typically conferred jointly by the institutions involved' (TEQSA, 2022, TNE Toolkit p. 27)

[1] TEQSA Transnational Education Toolkit, November 2022: https://www.teqsa.gov.au/sites/default/files/TNE-toolkit.pdf

This risk profile and contractual requirements of these difference arrangements differ.

For example, due to an onshore component, articulation arrangements need to consider home country visa-risk and visa implications as a potential barrier to successful operation of the arrangement. Third-party arrangements require a strong emphasis on end-to-end quality assurance and oversight of the partner inclusive of learning outcomes and award issuance. Joint awards may include elements of articulation and third-party arrangements.

5. Onshore educational collaborations

Where a third party arrangement is established with an onshore (Australian) educational collaboration partner who will deliver higher education to international student visa holders, the provider's capacity to comply with the standards under the ESOS Act, in particular, the National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code) should also be assessed prior to entering into, or continuing an educational partnership.

6. TPA Regulatory Accountability Schedule

6.1 TPA Establishment

Element	Activities and consideration	HESF	Responsibility	Summary Requirement
1. Partnership proposal				
Initiation phase	Opportunity identified, scoped and rationale developed	6.2.1.b	Southern Cross Global	Initial proposal document
Initial approval	Approval for further investigation into proposal and development of business case	6.2.1.b	Executive Director, Global	Signed proposal approval
2. Discovery				
Business case development	A business case is developed including: - demonstrated alignment with institutional strategic plan - market analysis supporting proposal - proposed KPIs (inc conditions i.e. minimum student numbers) - a preliminary risk assessment	6.2.1.b	Southern Cross Global	Business Case

Element	Activities and consideration	HESF	Responsibility	Summary Requirement
Academic case	An academic case is developed including: - credit to/from institution - course delivery mode and structure - proposed admission criteria - proposed amendments to accredited course required - mechanisms for moderation - in-country accreditation required (if applicable) - a preliminary risk assessment	6.3.1.a	Southern Cross Global, Faculty	Risk Assessment (as part of Business Case)
Internal approvals	EPOC provides in principle endorsement of the business and academic cases, pending outcomes of the site visit and due diligence assessment.	6.1.3, 6.1.1	Southern Cross Global	Minutes of EPOC (and relevant approving Committee)
3. Due Diligence				
Site visit	Site visit is undertaken as part of due diligence (unless mitigating circumstances prevent site visit)	6.2.1.e	Business Intelligence and Quality (BIQ)	Summary of Site visit or planned visit itinerary
Due diligence	Due diligence is undertaken (see below)	6.2.1.e	Business Intelligence and Quality (BIQ)	Due Diligence Checklist as per below section

Due Diligence Checklist

Undertaken by Business Intelligence and Quality (BIQ) as a combination of desk top audit and site visit including interviews

Area	Requirements	HESF	Evidence
Organisational structure	• Organisational and Governance framework and reporting lines • Business Continuity Plan • Evidence of corporate governance structures (i.e. minutes of meetings of governing body)	6.2.1.e, 6.2.1.f	Documents as specified
Fit and proper persons	Governance members and subcommittees - declaration of interest disclosures from governance members, including identification of foreign affiliations, relationships and financial interests. Declaration of any past academic integrity risk issues.	6.2.1.e, 6.2.1.f	Fit and Proper Person Declarations (TEQSA Template)
	Details of senior executives for both higher education operations and VET operations - including identification of foreign affiliations, relationships and financial interests. Declaration of any past academic integrity risk issues.	6.2.1.e, 6.2.1.f	Declarations received as detailed
	Staff (teaching and learning, and research) declaration of interest disclosures from staff, including identification of foreign affiliations, relationships and financial interests. Declaration of any past academic integrity risk issues.	6.2.1.e	Declarations received as detailed
Third party arrangements	Third party, articulation or collaboration arrangements already in place between the proposed partner and other universities or tertiary education providers	6.3.1, 6.2.1.e	Evidence if relevant
Academic quality	Assess staff members' (teachers, researchers and senior academic leaders) CVs to ensure they have the appropriate qualifications and discipline (learning and teaching scholarship) expertise to deliver higher education units.	6.3.1.a, 3.2.2	Yes or No (CV's as appropriate)

Area	Requirements	HESF	Evidence
Capacity and capability	Review the administrative capability, including the entity's staffing structure and systems to support and deliver the proposed arrangement and workforce planning	6.2.1.e	Organisational Structure or Workforce Plan
	Review and confirm IT infrastructure, including Wi-Fi, capacity and capability to run appropriate learning management systems, including cyber-security plans and processes in place.	6.2.1.e	Assessment summary
	Sufficiency/quality of student support (access to quality academic/ non-academic support, orientation and transition support, English language assistance, career guidance, counselling and wellbeing support, grievance processes) and facilities (teaching spaces, IT infrastructure, accommodation, transport, social activities) to enhance student success and experience	1.3, 2.2, 2.3, 2.4, 3.3	Assessment summary
Monitoring and intervention	Proactive progression monitoring and early academic intervention for at risk students, including access to academic support and teaching staff	1.3.3, 1.3.4, 3.2.5	Assessment summary
Acceptance of Australian awards	Are there concerns about the validity/recognition of an Australian award in this country?	6.2.1.e, 6.1.4	Assessment summary
Foreign interference and foreign influence considerations	Is the proposed TPA partner open, transparent and verifiable? AND Does the proposed TPA partner have institutional autonomy and independent decision-making separate from the host government?	6.2.1.e, 6.1.4	Assessment summary

Area	Requirements	HESF	Evidence
	Are there controls to reduce risk to the University or national interest of compromise of research, sensitive data, intellectual property (IP) and commercial advantage?	6.2.1.e, 4.1, 5.2.2	Assessment summary
	How does the proposed TPA partner's host country score on public democracy, freedom, and corruption indices?	6.2.1.e, 6.1.4	Assessment summary
	Are there controls to reduce risk of reputational damage or threat to national security (i.e. conflicts with principles of academic freedom, unwanted technology transfer?)	6.2.1.e	Assessment summary
	Do you have avenue of legal recourse if intellectual property is stolen or misappropriated?	6.2.1.e, 5.2.2, 4.1.1.b	Yes or No
Financial considerations	Collation and assessment of: - Annual reports, including three years of audited financial reports - Company ownership databases - Business registers - Court documents	6.2.1.e	Summary
Legal matters and grievances	Current or previous court proceedings relating to non-compliance or alleged misconduct	6.1.4	Relevant searches
	Processes in place for reporting and managing complaints and grievances	6.2.1.j	Policy and Procedure
	Policies, procedures, frameworks and plans for internal quality assurance and to guide compliance with the legislative and regulatory framework	6.3	Policy and Procedure etc

Area	Requirements	HESF	Evidence
Quality assurance and integrity	Evidence of academic quality assurance including policies and procedures that demonstrate experience in admission, advanced standing, assessment and academic integrity processes	6.3	Policy and Procedure etc showing ability and experience
Regulatory profile	Collation and assessment of: - Local tertiary education regulator regulatory file (all correspondence past five years) - Local professional accreditation status including any conditions	6.2.1.e, 6.3.1.a	Collated evidence
Reputation	Undertake an internet search and assess: - Local media reports - Social media posts	6.2.1.e, 6.1.4	Evidence as applicable
Risk management	Risk assessment registers and risk management plans including potential conflicts of interest	6.2.1.e	Evidence as applicable
	Scan of political or economic instability or sensitivities, including review of advice from Department of Foreign Affairs and Trade Travel for the country or region. https://www.scu.edu.au/secure/financial-services/travel-services/ https://www.smartraveller.gov.au/destinations	6.2.1.e	Evidence as applicable along with ISOS information
Strategic alignment	Purpose, vision, mission statement and strategic priorities align with the University	6.2.1.b	Strategic Plan
	Academic outcomes (progression rates, attrition rates and completion rates and times)	1.4	Reports on Performance

Area	Requirements	HESF	Evidence
Student outcomes	Student profile (domestic, international and educational background)	2.2.3	Reports on Performance
	Graduate outcomes – evidence of outcomes for completing students	2.2.3	Reports on Performance
Student experience	Are there mechanisms for gathering student feedback on their academic and student experience (i.e. student survey results, reports of complaints, reports of critical incidents?)	2.3, 2.4, 5.3.5, 5.3.7	Evidence, reports and data, as applicable
Domestic partnerships only			

Regulatory profile	Tertiary education regulator for domestic partnerships the regulatory file is to include consideration and assessment of:
	- AAT eCase,
	- Training.gov.au
	- TEQSA's National Register
	  ○ Registration conditions
	  ○ Recent decisions
	  ○ TEQSA Risk Rating
	- TEQSA Decisions and Notices including:
	  ○ Most recent registration renewal decision notice
	  ○ Most recent course accreditation renewal decision notice
	  ○ Most recent CRICOS renewal decision notice
	  ○ Most recent provider risk assessment
	  ○ Requests for Information over past 12 months
	  ○ Voluntary Undertakings
	  ○ Agent management issues
	- Department of Home Affairs required Evidence Levels and any related issues
		National Code 2018	Collated evidence

Area	Requirements	HESF	Evidence
Other regulatory and funding	Department of Education - Status and decision for student loans or Commonwealth supported places https://www.education.gov.au/collections/higher-education-providers-2021-2023-funding-agreements	6.2.1.e, 6.3.1.a	Evidence as applicable
Other regulatory ELICOS	Communications, applications, approvals, decisions or notices from ASQA or TEQSA in relation to the delivery of ELICOS or Foundation courses for the last five years	6.2.1.e, 6.3.1.a	Evidence as applicable
Location capacity	Initial CRICOS assessment for registration of location for delivery of education to international onshore students	National Code /ESOS Act	Occupancy certificate

Element	Activities and consideration	HESF	Responsibility	Summary Requirement (Add appropriate document/detail)
4: Contract development and sign off				
Legal considerations	University Legal provided with business case and due diligence report for TPA	6.2.1.a	Southern Cross Global	Business case and due diligence report for TPA
	The type of TNE arrangement is clearly identified (articulation, TPA and/or joint award)	6.3.1	Southern Cross Global	Definition endorsed by Legal

Element	Activities and consideration	HESF	Responsibility	Summary Requirement (Add appropriate document/detail)
	Legislative scanning to understand the scope of all relevant in-country laws (such as privacy and data protection, consumer, labour laws, fraud, antibribery), including compliance requirements. Assessment against SCU's policy and obligations under Australian law to ensure any conflict is identified ahead of contract establishment.	6.2.1.a	SCU Legal Office	What has been reviewed to determine in-country law and compliance? Provide your assessment of any conflict found to Southern Cross Global.
University internal approvals	University executive and governance (if applicable) have approved the business and academic cases, following positive outcomes of due diligence assessment	6.1.3, 6.1.1	Southern Cross Global	Minutes of EPOC (and relevant approving Committee)

Element	Activities and consideration	HESF	Responsibility	Summary Requirement (Add appropriate document/detail)
Contract preparation	A draft contract is prepared and: - utilises the approved SCU educational collaboration agreement template - clearly defines the type of collaboration - is consistent with University policy and procedure and meets Australian higher education requirements and regulation - has contingency plans (i.e. teach out provisions, cancellation provisions) - considers and treats subcontracting - includes a roles/responsibilities matrix clearly defining each party's delegated activities/ expectations - includes details of ongoing quality assurance requirements (i.e. site visits, peer review) - includes clear requirements for partnership governance (i.e. composition and frequency of joint management committee meetings) and reporting	6.2.1.a, 6.2.1.i	SCU Legal Office	Draft contract
Negotiation	Draft contract provided to Third party for consideration and comment	6.2.1.a, 6.2.1.i	SCU Legal Office	Draft contract
Signing	Mutually agreed contract signed by Executive or delegated officer of each party	6.2.1.a, 6.2.1.i	Office of VCG	Final contract
5. Implementation and on-boarding				

Element	Activities and consideration	HESF	Responsibility	Summary Requirement (Add appropriate document/detail)
Relationship building	Identify key stakeholders at each party to build relationships, ensure clear contact points and facilitate and engagement, including between Faculty and in-country teaching staff. Establish agreed communication mechanisms with awareness of time-zone differences	5.4	Academic Portfolio Office (APO)	Organisational chart
Partner staff training	Training of staff involved in the TPA to include Primary provider policies and procedures, systems/infrastructure, and other matters as relevant (may be virtual or in-country). Ensure partner staff are clear on all aspects of SCU policies, the course and course delivery, including admission standards, advanced standing, academic integrity, support for at-risk students, assessment moderation, grades, student policies (i.e. special consideration), complaints and appeals, critical incident reporting. Agreement on appropriate and accessible academic and non-academic support structures, including progression monitoring and intervention, English language support and counselling	6.2.1.f	Academic Portfolio Office (APO)	Induction evidence

Element	Activities and consideration	HESF	Responsibility	Summary Requirement (Add appropriate document/detail)
Students	Student complaints and appeals mechanisms are in place, clearly communicated and monitored. Orientation programs are comprehensive and in place (inclusive of support mechanisms available for well-being and academic success as per HESF). Training is provided and comprehension ensured for student systems including AIMS module, Blackboard, TurnitIn etc Contact points for academic and learning support are clearly identified, including academic skills development where required (i.e. referencing, research, online library use)	6.2.1.j, 1.3, 2.4 3.3,	SCU Global	Evidence as appropriate
Access	Access to required resources including IT systems, portals etc for staff and students. Any IT barriers (i.e. firewalls, banned sites, illegal VPNs) are identified and accommodated	2.1	Tech Services	Evidence as appropriate
Role and responsibility matrix	A role and responsibility matrix is in place that clearly sets out each party's activities across the student lifecycle – from marketing and recruitment through to graduations and award conferral and aligns with the HESF.	6.2.1.k	Academic Portfolio Office (APO)	Matrix

Element	Activities and consideration	HESF	Responsibility	Summary Requirement (Add appropriate document/detail)
Teaching	SoLT around the SCU Model Agreement on any customisation or amendment to courses required (i.e. in country context)	1.3, 2.4, 3.3	Academic Portfolio Office (APO)	Evidence of inducting into SoLT Framework
Use of Corporate Logos and marketing materials	Establishing the rules around accessing and using SCU trademarks and logos.	7.3	Marketing Media and Communication	Evidence as appropriate
MCM	Formally agree on members of management committee, frequency of meetings and conduct (i.e. virtual, agenda)	5.4		

6.2 TPA Maintenance

Element	Activities and consideration	HESF	Responsibility	Summary Requirement (Add appropriate document/detail)
1. Monitoring and reporting				
Cohort reporting	Reporting on student enrolments, performance, attrition and graduate outcomes.	2.2.3	Business Intelligence and Quality (BIQ)	HY and FY Reports
Reporting	Reviews of key activities performed on an agreed cycle (each teaching period and annually) should be in place in accordance with the Educational Partnership Quality Assurance Procedures. Results are provided to partner and reported to the appropriate University governance committees. Focus areas: - Admissions processes and record keeping - Orientation and Student Support - Student pathway analysis - Student performance monitoring - Staffing capabilities and Scholarship/Professional Development - Assessment moderation - Academic integrity - Complaints and Appeals (including Critical Incidents) - Conferrals	6.1.1, 6.3.1.a., b., d.	Business Intelligence and Quality (BIQ) ?? Academic Portfolio Office (APO)	TPA Performance Report (MCM) Template

Element	Activities and consideration	HESF	Responsibility	Summary Requirement (Add appropriate document/detail)
Compliance Audit	Quality assurance and compliance audits are undertaken in compliance with the Educational Partnerships Policy, at least every two years to ensure the TPA complies with the Agreement and relevant regulatory provisions to mitigate any risk to the University	5.4, 7.1, 7.2	Business Intelligence and Quality (BIQ)	As per the Agreement
2. Strategic Review				
Effectiveness and Strategic Alignment	Strategic review of partnerships reported to the appropriate University governance committees and into the MCMs. Focus areas: - Growth (Meeting KPI's) - Performance (Quality Assurance Thresholds) - Sustainability - Compliance	Domain 5	SCU Global	Annual Review
3. Agreement renewal proposal				
Strategic review	Has a strategic review of the partnership been undertaken prior to contract re-negotiation? Is there a need to review KPIs or conditions?		Legal, SCU Global	Yes or no

Element	Activities and consideration	HESF	Responsibility	Summary Requirement (Add appropriate document/detail)
Revenue targets	Has the partnership been financially successful? Is the partnership financially viable?	6.2.1.e	Financial Services	Financial report
Student performance	How have students performed, including against SCU cohorts? Are students meeting expected academic standards?	1.4	Business Intelligence and Quality (BIQ)	Student Outcomes Analysis
Course review	Have the course/s delivered at/by TPA been reviewed? Are amendments required (i.e. customisation to off-shore context?)		Business Intelligence and Quality (BIQ)	Comprehensive course review outcomes, peer review reports
Issues	Have any specific issues or incidents occurred in the term of the partnership – academic, financial, political, security, student complaints? Have these been resolved? How will future instances be mitigated?		EPOC	Review of MCM minutes Review of site visit reports Review of academic and non-academic misconduct Review of complaints / grievances
4. Contract renewal or termination				

Note: additional requirements apply if the partnership is considered at risk of foreign interference[2].

[2] Department of Education, Guidelines to Counter Foreign Interference in the Australian University Sector available at https://www.education.gov.au/guidelines-counter-foreign-interference-australian-university-sector/resources/guidelines-counter-foreign-interference-australian-university-sector

7. References and sources

Department of Education, Due Diligence Assistance Framework

Department of Home Affairs

Department of Foreign Affairs and Trade

TEQSA, 2022, Transnational Education Toolkit