16 December 2015

Professor Nick Saunders AO
Chief Commissioner
Tertiary Education Quality and Standards Agency
GPO Box 1672
Melbourne Vic 3000

By email: consultation@teqsa.gov.au

Dear Professor Saunders

Proposed public release of key financial metrics on TEQSA registered higher education providers

Thank you for the opportunity to provide comments in response to the above consultation paper released by TEQSA in November 2015. The University of Sydney already makes full public disclosure of its financial performance and position on an annual basis and is happy to support the public release of key financial metrics for all higher education providers registered with TEQSA. In response to the specific questions asked in the paper:

Does your organisation support the proposed public release of key financial metrics? If not, why, and what changes would you propose?

The University of Sydney is one of the largest public comprehensive universities in Australia. In response to specific NSW Government regulation, the University is already required to publish its full financial results on its web-site each year, while the NSW Auditor General reports annually to the NSW Parliament and publicly on the financial performance of all universities established by Acts of the NSW Parliament. Furthermore, the Commonwealth Department of Education and Training also publishes the full financial results of all 38 Australian public universities on its web-site each year in a standardised format.

As a result, the University in particular and the public university sector in general is already making full public disclosure of financial performance and information on an annual basis. The University therefore fully supports the public release of key financial metrics for all registered higher education providers.

Are the proposed metrics appropriate for public release in a de-identified, aggregated manner? If not, why, and what changes would you propose?

Since all public universities are already required to provide full public release of their financial performance and position, we take the view that this establishes the best-practice benchmark against which all other higher education providers should be measured. If the public university sector is required to provide full public release of financial data then we see no reason why all other non-public university and non-university higher education providers should not also be expected to report in the same manner.
Reporting on a de-identified or aggregated manner does not appear to serve any useful public purpose. For financial metrics to have any valid purpose, they need to be made available on a dis-aggregated and fully identified basis as occurs currently for the public university sector.

Do you support the proposed provider groupings based on provider type and provider size? If not, why, and what changes would you propose?

On the basis that all public universities are already required to provide fully identified published financial results for public release, we do not support the use of provider groupings based on provider type and provider size.

Alternately, we take the view that all competitors in the higher education sector should equally be required to publish their full financial results on an annual basis. Given the existing reporting requirements of the public university sector, this is the only manner in which all stakeholders of higher education providers could be equally informed. If financial data for all higher education providers is fully disclosed in a consistent format, this will enable those inside and outside the sector with an interest in its performance to determine which organisations should be grouped together for benchmarking purposes.

Do you support the proposed presentation of the metrics in chart and table format? If not, why, and what changes would you propose?

The presentation of the data, whether in chart or table format, is secondary to the questions of equal public release for all higher education providers and whether or not data should be made available on a dis-aggregated and fully identified manner.

In the Consultation Paper, TEQSA state that it is guided by the underlying principles of enhancing and improving the level of publicly available financial information and protecting the confidentiality of the providers. These two principles are inherently conflicting in that the one cannot be satisfied without affecting the other. Given the depth of financial information that is already publicly available for the largest participants within the higher education sector, we take the view that stakeholders would be best informed if all higher education sector participants were required to report on the same basis as that required of the public university sector.

Should any further information be required from the University of Sydney in regards to this enquiry, please do not hesitate to contact Mr Tim Payne, Director Higher Education Policy and Projects in my office, tim.payne@sydney.edu.au, 02 9351 4750.

Yours sincerely,

(signature removed)

Dr Michael Spence
Vice-Chancellor and Principal