

## Major changes involving registration or course accreditation

Section 14.2 of the *Guidelines for the registration of non self-accrediting higher education institutions and the accreditation of their course/s (relating to National Protocols A and B)* sets out procedures for higher education institutions to follow when major changes have the potential to impact on the institution's registration or course accreditation.

The National Guidelines note that major changes to institutional arrangements, courses, or course delivery arrangements may be planned, or may occur due to circumstances which are unplanned. Such changes may alter the terms under which an institution was registered to provide higher education courses, or under which its courses were accredited. If any major changes are proposed or likely to occur, an institution should seek advice from the Government Accreditation Authority (in Victoria the VRQA) as early as possible to confirm the process to be followed and the level of approval required.

If the changes relate to more than one jurisdiction, the Government Accreditation Authorities in the primary and secondary jurisdictions will confer to determine if separate processes for approval or notification are required in each jurisdiction.

### **Examples of major changes affecting registration:**

- merger with another body;
- changes to the legal status of the corporate entity, such as from or to incorporated, not-for-profit etc., or change of trading name;
- contracting with another body or person to deliver a significant proportion of a course or services;
- changes in ownership and/or shareholdings;
- significant organisational changes such as those which have a major impact on governance, quality assurance and staffing (such as restructuring of academic governance arrangements, or changes involving more than 25% of senior academic or administrative staff);
- any incident or circumstance which could be deemed to affect the probity of the institution or its staff particularly in relation to the 'fit and proper person' requirements;
- a significant decline in financial position;
- major alterations to teaching premises;
- changes to delivery location by moving to a new site, adding an additional site (including any offshore sites) or withdrawing from an existing site;
- changes to the mode of delivery of a course, such as from face-to-face to distance education or on-line.

### **Examples of major changes affecting course accreditation:**

- withdrawal of professional or industry course accreditation;
- changes to learning outcomes for a course, or core subjects within the course;
- significant changes to core subjects within a course;
- changes to course entry requirements;
- significant changes to course structure, such as to the proportion of core to elective subjects;
- significant changes to elective subjects, including addition, substitution or deletion of subjects in a course, where such changes affect more than 25% of the total number of subjects in the course, measured over the duration of the course accreditation period;

- any changes to the title of a course;
- significant reduction in student contact hours in a course.

All major changes with the potential to alter the terms under which an institution was registered to provide higher education courses, or under which its courses were accredited, should be reported to the VRQA in the planning stage, prior to being implemented. If the particular circumstances of the change make this impossible, they should be reported as soon as feasible. The VRQA will determine whether additional information or approvals are required, whether by seeking advice from an appropriately qualified external expert source, or seeking advice from previous assessment panel, or through establishment of a new assessment panel. The VRQA may also suspend or cancel an institution's registration or course accreditation if the circumstances or conditions of approval have been changed in such a way as to warrant this.

In addition to the requirement to seek approval for major changes, institutions are required to inform the VRQA of any changes relating to administrative arrangements or record-keeping, such as changes in the name of the institution, address or contact details.

It should be noted that changes are to be expected in response to changing market conditions, or as a result of continuous improvement, and may not significantly alter an approved course or delivery arrangements. For example, courses should be reviewed regularly and restructured where appropriate, subject curricula and reading lists need to be updated regularly, new technology can provide opportunities for more effective learning, and student support services should be evaluated and improved periodically. Such changes should be reported in the institution's annual report submitted to the VRQA, which may seek additional information, where relevant.

## Process for a major change

The National Guidelines set out the following process to be followed with respect to major changes to an institution's registration or course accreditation:

1. The institution contacts the Government Accreditation Authority (in Victoria the VRQA) to discuss the change in circumstances or the proposed change as early as possible in the process.
2. The institution submits an application which includes precise details of the nature of and reasons for the changes, as well as the impact of those changes.
3. A preliminary review is conducted by the Government Accreditation Authority.
4. Additional information may be requested.
5. External advice may be sought to assist in assessing the application. This may include establishing an assessment panel or seeking advice from the chair or member(s) of the previous assessment panel(s), a content expert or a financial expert.
6. The change will be noted, approved or rejected by the responsible decision-maker or delegate depending on the nature of the change. If rejection of the application or approval with conditions is contemplated, details of the reasons will be provided to the institution and the institution's comment will be sought, with a specified time limit, prior to a decision being made.
7. The applicant will be notified in writing of the outcome.

The decision may be appealed in accordance with provisions in Section 11.11 of the National Guidelines.

## Format for a major change application

Major change applications should follow the following format.

### *1. Title page*

Detail the name and contact details of the institution, the type of major change sought (registration, or accreditation and course(s) affected) and the date of application. The application should be signed by the institution's authorised officer.

### *2. Table of contents*

Table of contents should identify each component part of the application and list accompanying documentation.

### *3. Summary of the proposed change*

State briefly, in a few sentences, what is to be changed, and why and when.

### *4. Reasons for the proposed change*

Explain the reasons for the proposed change and describe the circumstances motivating the change, including the need to make the change now, rather than deferring it to the time of re-registration or re-accreditation.

### *5. Expected impact of the change*

Indicate the effect the change will have on the operation of the institution and/ or the way in which particular courses are conducted. Document the expected impact on students, including any impact on the eligibility of graduates to meet professional registration requirements. Indicate the consequences of not making the change.

### *6. Detailed description of the proposed change*

Provide complete details of the change proposed, and indicate how they differ from the details of what was initially approved. If more than one aspect of a course is to be changed, provide complete details for each aspect.

### *7. Expected implementation date*

Indicate the proposed implementation date and any consequences if implementation is delayed.

### *8. Supporting documentation*

Attach documentation supporting the application, e.g. correspondence, legal documents, financial statements, curriculum documentation

The following table indicates the type of information required to support various categories of major change.

<b><i>Nature of proposed change (registration)</i></b>	<b><i>Information required</i></b>
Merger with another body	Full details of changes proposed, and supporting documentation
Changes to the legal status of the corporate entity, such as from or to incorporated, not-for-profit etc., or change of trading name	Full details of changes proposed, and supporting documentation Evidence that agreements made by the institution under previous status or trading name remain valid, or have been amended
Contracting with another body or person to deliver a significant proportion of a course or services	Full details of changes proposed, and agreements between parties
Changes in ownership and/or shareholdings	Full details of changes proposed, and supporting documentation

Significant organisational changes such as those which have a major impact on governance, quality assurance and staffing (such as restructuring of academic governance arrangements, or changes involving more than 25% of senior academic or administrative staff)	Full details and rationale for change CVs for new senior staff appointments
Any incident or circumstance which could be deemed to affect the probity of the institution or its staff particularly in relation to the 'fit and proper person' requirements	Full details and supporting evidence
A significant decline in financial position	Full details and supporting documentation
Major alterations to teaching premises	Details of alterations, including floor plans Evidence of relevant government and council approvals and that legislative requirements are met
Changes to delivery location by moving to a new site, adding an additional site (including any offshore sites) or withdrawing from an existing site	Details of new premises, including floor plans Evidence of relevant government and council approvals and that legislative requirements are met
Changes to the mode of delivery of a course, such as from face-to-face to distance education or on-line	Details and rationale for change Details of relevant staff and facilities
<b><i>Nature of proposed change (accreditation)</i></b>	<b><i>Information required</i></b>
Withdrawal of professional or industry course accreditation	Full details and outline of any rectification action proposed
Changes to learning outcomes for a course, or core subjects within the course	Full details and rationale for changes
Changes to core subjects within a course	Full details and rationale for changes Details of proposed course structure, subject titles and outlines
Changes to course entry requirements	Old and new requirements and rationale for change
Significant changes to course structure, such as to the proportion of core to elective subjects	Full details and rationale for changes Details of proposed course structure, subject titles and outlines Transitional arrangements for currently enrolled students
Significant changes to elective subjects, including addition, substitution or deletion of subjects in a course, where such changes affect more than 25% of the total number of subjects in the course, measured over the duration of the course accreditation period	Full details and rationale for changes Details of proposed course structure, subject titles and outlines Details of changes to staff and facilities required Transitional arrangements for currently enrolled students
Any changes to the title of a course	Old and new title(s) and rationale for change
Significant reduction in student contact hours in a course	Full details and rationale for changes