

SUBMISSION TO HIGHER EDUCATION STANDARDS PANEL CONSULTATION PAPER ON AMENDING THE PROVIDER CATEGORY STANDARDS

14 April 2020

Universities Australia welcomes the opportunity to comment on the Higher Education Standards Panel's consultation paper on amending the Provider Category Standards. Universities Australia is the peak body representing Australia's 39 comprehensive universities that educate more than a million students and undertake research on behalf of all Australians.

Universities Australia is generally supportive of Professor Coaldrake's recommendations in the report of the Review of Provider Category Standards. In particular, Universities Australia is strongly supportive of the Review's affirmation of the central importance of both research and teaching as university activities. The Review makes clear the strong academic and community expectations of the research-teaching nexus as the bedrock of Australian universities.

INTRODUCTORY COMMENTS

Provider categories – University College category

Universities Australia holds concerns about the constitution of the proposed 'University College' provider category. In the discussion paper, the category of 'University College' will be home to several distinct types of higher education provider:

- Newly established institutions with the intention of becoming an Australian university in five years;
- Accomplished higher education providers developing a research capacity with the intention of becoming an Australian university;
- Accomplished higher education providers with no intention of developing a research capacity or becoming an Australian university.

Therefore, this encompasses three very different types of institution. As a general principle, Universities Australia supports the concept that Australian institutions that can be construed to be university-like should have a research capability that informs their teaching and exposes students to high-quality scholarship. The benefits of research-active universities are manifold and well-described in Professor Coaldrake's review.

Over decades, Australia's universities have established a strong global reputation for quality and excellence that is the envy of many nations. This is the basis for the policy position of protecting use of the title 'University' in Australia. Universities Australia is concerned that extending the use of the word 'University' to institutions without a research capability, nor an affiliation to a university with a research capability, risks causing a diminution of the strong reputation of the Australia's higher education sector. It is

important to remember that the success of all Australian higher education providers, not just universities, are beneficiaries of that reputation and have a common interest in its maintenance.

Universities Australia is also concerned that the proposed use of the term 'University College' would lead to confusion amongst prospective students as to the relative status of higher education providers, as no clear way to differentiate between the three different types of university colleges has been established. In addition, the use of the term 'University College' will impact on other institutions known as university colleges that exist variously as residential colleges, pathway or enabling course providers or institutions within the current university college category.

Universities Australia urges the reconsideration of the proposed university college category, and suggests consideration of a different destination category for accomplished higher education providers.

Research benchmarks

Universities Australia is supportive of the introduction of benchmarks for research quality and quantity for providers in the 'Australian University' category. This further affirms the vital role of universities in undertaking research that benefits the Australian community. Instituting these benchmarks reinforces the drivers of quality and excellence that underpin the success of the Australian university system. Universities Australia also notes the panel's recognition that universities undertake not only research of global importance, but also specialised research of national importance and supports the idea of 'national standing' for research in fields specific to Australia. Indicators of national standing will require careful consideration.

Civic engagement requirements

Universities Australia is strongly supportive of the inclusion of civic engagement requirements in the threshold standards. Contributing to community discourse, engaging and working with communities is core to the mission of Universities Australia's members. Civic engagement is critical in advancing the interests of society by disseminating expertise from the latest scholarly research into the community and underpins a vibrant democracy. Universities Australia views civic engagement as fundamental to the social licence to operate of universities and other education providers.

SPECIFIC CONSULTATION QUESTIONS

1. Amendments to the Provider Category Standards (Part B1)

Question 1: Does the revised description of an 'Institute of Higher Education' in **Appendix C B1.1**, provide sufficient clarity for providers seeking to enter the category?

Universities Australia does not propose to comment on this question.

Question 2: Do you foresee any implementation issues in creating the new 'University College' category?

Question 3: Are the requirements in the new 'University College' category in **Appendix C B1.2** sufficiently clear and appropriate to uphold quality and facilitate institutional progression?

The criteria outlined in the panel's draft are sufficiently clear and appropriate for the purpose of category standards for an accomplished and mature higher education provider. In particular, the requirement for

such a provider to self-accredit 70 per cent of its total courses of study ensures that providers in this category have well-developed academic governance and curriculum policies.

However, Universities Australia remains concerned that the proposed 'University College' category will combine very different types of institutions and there is a substantial risk that institutions in the 'University College' category will be construed to be university-like, even if they have no intention or aspiration to become Australian universities. Universities Australia remains of the view that the sector is best served by establishing a new category for accomplished higher education providers that do not intend to become universities. The provider category standards outlined for the proposed 'University College' category would be suitable for this purpose, combined with an appropriate nomenclature that reflected their maturity, yet did not conflate such institutions with universities that deliver research-informed teaching.

The 'University College' category could then be retained for institutions on a pathway to becoming Australian universities, providing clarity and differentiation in the provider category standards.

Question 4: Is there sufficient clarity for providers about the distinct requirements in the revised 'Australian University' category for providers offering courses of study in three or more broad fields of education versus those with a 'specialised focus' (**Appendix C B1.3**)?

The criteria for universities of specialised focus is sufficiently clearly distinct from comprehensive universities, and the research requirements for specialised focus universities are clear and reasonable.

Question 5: Do you consider the research benchmarks outlined in **Appendix C B1.3 (16)** (i.e. that research be 'world standard and/or be of national standing in fields specific to Australia') appropriate for the revised 'Australian University' category standard?

In general, these benchmarks are sound and reflect the commitment to quality and excellence of the Australian university sector. Noting that there is not an exact mapping between broad fields of research and broad fields of education, an extended transition phase to the final requirements that require an institution to perform research at world standard at fifty per cent of the broad fields of education in which it delivers courses of study is appropriate.

Question 6: What factors should TEQSA consider in determining whether the research at an Australian University is 'world standard', in particular where an existing benchmarking exercise, such as the ERA, is not available?

Question 7: On what basis should TEQSA assess whether an Australian university meets the benchmark for research of 'national standing in fields specific to Australia'?

Universities Australia would suggest these questions would be best addressed through an expert working group at a later stage. In general, the use of existing information is preferred, but there will be instances in which this is not possible, particularly in Australian-specific fields. It is likely that bespoke approaches will be needed and Universities Australia emphasises the centrality of peer review in research evaluation. The HASS disciplines will require particular attention to ensure appropriate indicators are identified.

Question 8: Do the draft criteria for the revised ‘Overseas University in Australia’ category in **Appendix C B1.4** provide sufficient clarity for providers wishing to enter the category?

Universities Australia does not propose to comment on this question.

Question 9: Are the requirements for industry engagement, civic leadership, and community engagement sufficiently clear in the draft standards (**Appendix C B1.2 (9-10)**)?

These criteria are sufficiently clear to establish the intent of the standard. The implementation of the standard will naturally manifest different across the range of institutions.

2. Amendments to the self-accrediting authority criteria (Part B2)

Question 10: Do you have any comment on the draft amendments to the criteria for seeking authority for self-accreditation (Part B2 of the Threshold Standards), described in **Appendix D**?

The criteria for seeking self-accrediting authority are sufficiently clear. The consideration of track record in determining whether a provider should be able to self-accredit is particularly important and ensures that self-accreditation authority is limited to mature higher education providers.

3. Provisions for greenfield universities

Question 11: Do you think there should be provision for greenfield entry to the ‘University College’ category as a destination, as well as a pathway to the ‘Australian University’ category?

As per Universities Australia’s introductory comments on this matter, the ‘University College’ category should be restricted to providers intent on becoming an Australian university and developing their research capability. There is no distinct basis for allowing greenfield entry to the ‘University College’ category for higher education providers not intent on becoming a university. In particular, greenfield entry into categories above ‘institute of higher education’ subverts the requirements for accomplished higher education providers to self-accredit 70 per cent of their courses, and the accompanying track record requirements.

Universities Australia supports the creation of an appropriate higher category for non-university higher education providers which should reflect maturity and quality, and it is not clear that allowing greenfields entry to such a category supports that aim. In the same way that ‘University College’ should be reserved for developing universities, a higher category for NUHEPs should not include developing institutions.

An indicative structure could be as follows:

Category 1: *Institute of Higher Education*—a higher education provider meeting Part A of the Standards, active in scholarship that informs their teaching.

Category 2: Senior/mature higher education provider (name to be determined)—a higher education provider meeting Part A of the Standards, active in scholarship that informs their teaching, demonstrates community and industry engagement, and has the authority to self-accredit 70 per cent of the courses it teaches.

Category 3: *Australian University College*—a higher education provider meeting Part A of the standards; active in scholarship that informs their teaching; has the authority to self-accredit 70 per cent of the courses it teaches; demonstrates strong civic leadership and community engagement, and intends to meet the threshold standards for an Australian university within five years, including research benchmarks.

Category 4: *Australian University* – standards as outlined in the discussion paper.

Category 5: *Overseas University in Australia* – standards as outlined in the discussion paper.

Implementing such a structure would ensure an appropriate provider category exists for every type of higher education provider and provide clarity for prospective students.

Question 12: Do you have any comments on the implementation issues associated with greenfield universities (**Appendix C B1.2 (11-14)**)?

The process for the development of a greenfield university is appropriate, and the transition period for research benchmarks once in the ‘Australian University’ category is reasonable. It may be prudent to consider courses of action should a greenfield or aspiring university fail to achieve ‘Australian University’ status within a reasonable period of time. In such a case, it may be more appropriate for these institutions to transition to a category for accomplished non-university higher education providers.

4. Transition arrangements for existing providers

Question 13: Do you identify any issues of concern for providers in the Australian University of Specialisation and Australian University College categories that transition to the new ‘Australian University’ category—either with or without a ‘specialised focus’?

Existing providers should not transition to a higher category without applying to change category and demonstrating compliance with the relevant Higher Education Standards and Provider Category Standards. Some providers may have individual transition concerns and Universities Australia would ask that TEQSA provide reasonable accommodation to such providers.

Question 14: Are there other aspects of the transition of providers occupying the Higher Education Provider category to the new categories that the Panel has not considered but should?

Universities Australia does not propose to comment on this question.