

# SUBMISSION TO PROVIDER CATEGORY STANDARDS REVIEW

8 March, 2019

## INTRODUCTION

UA welcomes the opportunity to make a submission to the Review of Provider Category Standards (PCS).

As the Discussion Paper notes, it is timely to review the PCS to complete the process of reviewing the Higher Education Threshold Standards and ensuring they are fit for purpose and working well.

UA considers that the PCS are effective and appropriate and there is no need for major changes to the architecture. In particular, it is UA's view that the 'university' categories are well designed and appropriately specified. We do not see that these categories are in need of revision.

On the other hand, there is merit in examining the large and undifferentiated 'higher education provider' (HEP) category. It may be beneficial to providers, employers and – most importantly – students to provide for differentiation of provider types within this grouping.

UA does not have particular views about exactly how the HEP category might be redesigned. Indeed, it would not be appropriate for universities to seek to impose categories or definitions on non-university higher education providers (NUHEPs). We would, however, be interested in engaging in further discussion with the Review Panel, providers and other education sector stakeholders on possible options to develop transparent and useful categories for NUHEPs.

## 'AUSTRALIAN UNIVERSITIES'

As stated above, UA considers that provider categories, and the criteria and definitions for these, are basically sound.

In particular, the specification of, and requirements, for the category 'Australian University' set a sensible range of criteria and attributes that represent well the necessary and distinctive characteristics of a university.

As the Discussion Paper notes, what is stipulated in the PCS is consistent with widespread international understandings of what a university is:

*'The expectation that universities are distinguishable from other types of higher education provider by combining is widely held internationally'.*

While the way the PCS codifies this understanding is described in the paper as 'somewhat unusual', it is simply a way of operationalising and entrenching a common-sense understanding within a regulatory instrument.

At universities in Australia and around the world, research informs teaching and contributes to the educational environment of the institution. This means that university teaching is up to date with the latest

knowledge and findings in the field. It also supports the open-ended, critical, enquiry-based learning that is fundamental to university teaching and learning, and to the university student experience.

Universities are the only institutions that combine rigorous education and training in both specific and generic skills, with both applied and blue sky research. This unique set of powerful capabilities is what enables universities to make their distinctive contribution to society and the economy. Higher education develops the advanced generic and specific skills that individuals and nations increasingly need, and the open-minded inquiry and continuous learning needed to drive and respond to the new economy. University research creates the new knowledge on which breakthroughs and innovation are based, and develops ways to apply knowledge to practical innovation.

## OTHER ‘UNIVERSITY’ CATEGORIES

The other ‘university’ categories in the PCS are also basically sound.

The category ‘Australian University of Specialisation’ provides a useful opportunity for institutions that specialise in one or two disciplines to offer a research-informed, university-level education in these fields. Other than the specialised scope, providers in this category must meet all the requirements for a university. This quite appropriately includes a requirement to offer both postgraduate and undergraduate courses.

UA would not support additional categories for providers that wished to offer postgraduate courses only. An additional category here would be unnecessary: any provider that wishes to offer only postgraduate courses can already seek registration as a ‘higher education provider’.

Overseas university categories are sound. Both categories require overseas providers to meet the same criteria as Australian universities (or universities of specialisation), with the additional requirement that they are recognised as universities in their home countries. This is a rigorous and appropriate policy architecture.

UA notes that the category ‘Australian University College’ has never been used. We are not aware of any provider that is currently moving towards seeking registration as an Australian University College. It may be worthwhile to consider the rationale for and objectives of this category, especially if the Panel were to examine options for differentiation within the ‘higher education provider’ category – as is suggested below.

## ‘HIGHER EDUCATION PROVIDERS’

The remaining category – designated simply as ‘higher education provider’ – is large, heterogeneous and undifferentiated. It comprehends a wide variety of providers offering different types of courses to different students and markets.

UA believes it would be valuable to examine options for enabling providers in this category to profile and differentiate themselves within the large and broad group of NUHEPs. Recognising different types of providers and their distinctive offerings – either instead of or more likely in addition to – the current ‘HEP’ category could enable providers to better signal what they offer students, and thus make it easier for students to pick the right provider and the right course for their needs. It may also help students and providers to construct meaningful pathways. A more differentiated series of HEP categories could also send clearer signals to employers.

UA does not at this point have particular suggestions to make on this matter. It is in any case not the place of universities to impose ideas or categories on other types of provider. We would, however, welcome the opportunity for further discussion and work with the Review, with providers in all categories and with other stakeholders (especially students and employers) to examine the issues and the options and to work towards practical and helpful solutions.

## Recommendations

UA recommends that:

- No change be made to the category ‘Australian University’;
- Other university categories be maintained essentially as they are; and
- The Panel examine options – in collaboration with providers and other stakeholders – for greater differentiation among NUHEPs.