



DEPARTMENT OF EDUCATION AND TRAINING –  
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Response to the Review of the Higher Education  
Provider Category Standards

7TH MARCH 2019

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Contributor

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# INTRODUCTION

1. Alphacrucis College (AC) wishes to thank Professor Coaldrake, the Education Minister and the Department of Education and Training for the opportunity to provide feedback on behalf of AC regarding the review of the Higher Education Provider Category Standards (PCS).
2. AC is a dual sector provider that became a Higher Education Provider (HEP) in 2008. With around 35,000 alumni, 4000 students, and 50 permanent staff with doctoral qualifications, we are one of the largest faith-based HEPs in Australia. AC has campuses in Adelaide, Brisbane, Hobart, Melbourne, Perth and Sydney. We offer programs from Diploma to PhD across all three of our faculties: Business; Education, Arts and Social Sciences; and Theology. Of the 129 HEPs in Australia, AC is one of the 12 that has self-accrediting authority (SAA) status, demonstrating a high level of trust by TEQSA.
3. AC plans to submit an application for a change in category status in 2020, so we appreciate every effort to make the PCS clearer and the processes as streamlined as possible. We also affirm the importance of the PCS for supporting a quality higher education sector for the future.

# WHAT CHARACTERISTICS SHOULD DEFINE A 'HIGHER EDUCATION PROVIDER' AND A 'UNIVERSITY' IN THE PCS?

4. AC holds that the Higher Education Standards Framework (Threshold Standards) 2015 continues to be effective in supporting the operation of genuine HEPs while reducing the number of institutions that are not meeting the Standards. We affirm the current criteria for HEP status and do not believe it necessary to undertake a further revision of these requirements.
  
5. The requirement that Universities are distinguished by their combination of teaching and research activity is also generally affirmed. We would, however, urge the panel to consider ways in which the practical links between research and teaching quality and the quality of student experience in Universities can be strengthened. The assumption that Universities are *ipso facto* higher quality teaching institutions because of their research is not supported by evidence. It would be helpful to be explicit about these links in the PCS.

## ARE THE PCS FIT FOR PURPOSE IN TERMS OF CURRENT AND EMERGING NEEDS? WHY?

6. It is widely acknowledged that independent higher education providers fulfil an important function within the sector. However, with the increasing internationalisation of education, the prohibitive barriers to the use of the title 'University' create inequity in market perception, particularly for international students. This is despite the fact that independent providers generally rate higher than Universities in both teaching quality and overall student experience. The excessive weighting of research in determining University status fails to recognise other critical components of education, namely teaching, student support, and engagement.
7. The discussion paper argues that the PCS act as a market signal for provider activity and quality. This implies that the title 'University' denotes an institution of superior quality. As the discussion paper states, "the sector should be aware of the lens through which students view institutions" (p.14). This must also apply to the perceptions around teaching that students associate with the term 'University'.
8. We accept that the 'University' title signals unique provider activity in research, but dispute that this also equates to superior provider quality overall. Student feedback data clearly indicates that this is not necessarily the case. While quantity of research is certainly a differentiator between the HEP and University categories, student data suggests that quality of teaching is not. This accuracy of perception is important for students, particularly in international export markets.

## SHOULD SOME CATEGORIES BE ELIMINATED OR NEW CATEGORIES BE INTRODUCED? WHAT SHOULD BE THE FEATURES OF ANY NEW CATEGORIES?

9. AC agrees with the discussion paper that the current PCS are too binary and do not allow for sufficient differentiation, particularly within the 'Higher Education Provider' category.
  
10. We do not propose that wholesale change to the PCS is required, however we strongly support the addition of a further category for self-accrediting higher education providers, of which there are currently 12. Achieving self-accrediting authority is a clear demonstration that an institution has established a long track record of trust, transparency and compliance with TEQSA. Such a distinction is already practically in use by TEQSA and it is only appropriate that excellence in self-assurance and self-assessment be recognised through the PCS. Particularly if the PCS do, in fact, function as a market signal for provider quality.

# DO SPECIFIC CATEGORIES NEED TO BE REVISED? HOW?

11. AC proposes modifications to the University College category to improve its utility. In particular, the most prohibitive requirement of this category is that "the higher education provider has realistic and achievable plans to meet all the criteria for an "Australian University" Category within five years of its approval to use the title "Australian University College"". While this is theoretically reasonable for a transitional category, we submit that it has not functioned effectively as a transitional category (as evidenced by the fact that no HEPs have made the transition to date).
12. Instead, based on international benchmarks, we recommend that 'University College' could exist as a destination category in its own right. While the definition of 'University College' varies across the world, most tend to be small, specialised and prestigious institutions, such as [University College London](#) or [Amsterdam University College](#). Achieving this category would signal teaching excellence and an appropriate level of research and scholarship.
13. A provider who achieved University College could apply for University when it believes it meets the appropriate standards, but the five-year countdown is unhelpful, impractical and prohibitive. It also does not necessarily align with the cycle of accreditation and registration with TEQSA making it less viable to achieve the transition in such a timeframe. The University College category will benefit from the removal of this requirement.
14. We also propose that the level of research required for University College should be qualitatively and quantitatively different to the level of research required for the other University categories. This difference could be described in terms of benchmarking or external referencing. That is, a University College needs to show research and scholarship appropriate to its size and which supports its mission. A University or University of Specialisation needs to show research quality and quantity comparable to other universities.
15. The expectation that aspiring HEPs can demonstrate research that benchmarks favourably against existing Universities is unrealistic given vastly different operating contexts and funding

arrangements. It was noted in the discussion paper that the intersection with public funding makes this leap from University College difficult, and this would be one of the key reasons.

16. We therefore strongly support the intention of the PCS review to create a rational and achievable pathway for higher education providers to "follow their path of development through a logical progression of stages, and to remain at each stage for as long as they need to be without having to move to the next stage unless they are ready".

17. **RECOMMENDATION: AC believes that the addition of a 'self-accrediting higher education provider' category and a reshaping of the University College category would achieve this outcome.**

18. Finally, we do not support an allowance for 'greenfield' Universities to operate in compliance with a sub-set of requirements as they scale up, unless the same possibility is offered to existing higher education providers. It would be more logical and rational for potential 'greenfield' Universities to follow the same path of development through the categories as all other providers. This could allow time for scaling up and progression could potentially happen quickly if 'greenfield' Universities could demonstrate that they meet the PCS at each stage.

# HOW WOULD THE NEEDS OF PROVIDERS, STUDENTS, INDUSTRY, REGULATOR AND BROADER PUBLIC INTEREST BE SERVED BY OUR SUGGESTED CHANGES TO THE PCS?

19. The impetus for the changes AC has suggested to the PCS is a desire to ensure that the PCS accurately reflect differentiation within the sector and provide a clear pathway for provider development and progression. Accuracy is important for providers, students, industry, and broader public interest, so that providers are recognised for quality and developmental progress, students and industry are informed and confident regarding the status and activity of providers, and the broader public has confidence in the rationality and integrity of Australia's higher education system.
20. We note the importance of the university title for Australian higher education institutions to compete in international student markets with overseas institutions, often of lesser quality. The change we have suggested to the University College category, and the more rational and feasible pathway for aspiring Universities would contribute to this without compromising quality.
21. While funding arrangements are not a focus of this review, it must be said that independent higher education providers are able to achieve equivalent (or superior) teaching quality for students without drawing so heavily on the public purse. By providing quality HEPs with a clear and achievable pathway to University status, increased competition for existing Universities would encourage innovation, diversity, flexibility, decreased bureaucracy, and increased focus on student outcomes. This would help Australia's higher education system remain a dominant force in the international market and increase public confidence in the sector, while continuing to maintain rigorous quality assurance and employability outcomes.

## CONCLUSION

AC thanks Professor Coaldrake and the Department for their efforts and trusts that this response will be of help in the review. AC looks forward to many more years of providing excellent higher education in the service of the Australian community.

Yours sincerely

A handwritten signature in black ink, appearing to be 'D. Perry', written in a cursive style.

Dr David Perry

Vice President Academic  
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