



RESPONSE TO THE PROVIDER CATEGORY STANDARDS REVIEW

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This submission contains 15 pages.

SUBMISSION TO THE PROVIDER CATEGORY STANDARDS REVIEW PANEL

INTRODUCTION

Avondale welcomes this opportunity to provide a response to the Provider Category Standards Review. The Discussion Paper, in laying out a good base for the review of the PCS, invites the public's response through a set of strategic questions. This response is guided by these questions and is provided from the perspective of an independent higher education institution with full self-accrediting authority. Avondale acknowledges the several issues raised in the discussion paper as important points requiring clarification and critique of the current Standards.

The PCS Review Discussion Paper profiles this Review against Australia's growing 'reputation as an education global leader'. The current Australian higher education sector is robust and competitive and its energy is driven by world rankings, its global reputation, its emerging diversity and its attraction to present and potential international markets. It highlights the need for Australia to 'continue to innovate' and to be responsive to 'emerging needs' and challenges. It acknowledges that the current PCS needs to be reviewed, to appreciate, among other things, the growing diversity within the Australian higher education system.

The Discussion Paper profiles the current system as represented by **40 Australian Universities, 1 Australian University of Specialisation, 2 Overseas Universities and 127 independent Higher Education Providers of which 12 have either full or partial self-accrediting status.**

In terms of the Provider Category Standards, universities are represented in four out of 6 categories with University College being a transition category [to university status] and all other providers represented in the Higher Education Provider Category as the table below illustrates. These categories are appropriate for Australia's purpose and the following discussion will clarify some opportunities to re-think the Australian University College category and suggest that variations within the University as well as specialised Colleges of Higher Education will be something for consideration in the PCS B1.1 Category.

| | |
|--|-------|
| - PCS B1.2 [University], | - 40 |
| - PCS B1.4 [University of Specialisation] and | - 1 |
| - PCS B1.5 [Overseas University] | - 2 |
| - PCS B1.6 [Overseas University of Specialisation] | - |
| - PCS B1.3 University College | - 0 |
| - PCS B1.1 Higher Education Provider [HEPs] | - 127 |

While most students are represented within the university category, approximately 10% of students are represented by the 127 Independent Higher Education Providers [HEPs] in the PCSB1.1 Category. This submission raises concerns that the HEPs are generally treated as a homogenous entity despite a broad range of indicators, which differentiate them. It might also seem tempting to minimise this category in that it caters for approximately 10% of students but as the Discussion Paper implies, there are wider risks and implications for overlooking this category

1. RECOGNIZING THE INCREASINGLY DIVERSE HIGHER EDUCATION SYSTEM WITHIN AUSTRALIA

The Discussion Paper points out rightly that the current PCS does not accurately reflect the ‘real differentiation of Australia’s higher education sector’ in that there is little “opportunity for higher education providers ... to signal their point of difference”. The Discussion Paper notes, accordingly, that “ensuring quality” for Australia’s “increasingly diverse higher education system” remains “a challenge for the nation” [13]. This context provides a critical base for this discussion.

From Avondale’s perspective, any remodelling of the PCS must provide scope for valuing and encouraging the diversity and range of providers represented in Australian higher education, both in the university and the HEP categories¹ [See Grattan Report]. To underplay this diversity would, undoubtedly, disadvantage HEPs, but, more importantly, it would be a lost opportunity for Australia to showcase the rich tapestry of expertise and experience, mission and vision, professional, corporate as well as industry connections and acumen available across the range of institutions represented in the 127 HEPs relegated to Category B1.1 of the PCS.

2. UNIQUE PROPOSITIONAL VALUE OF DIVERSITY AS VALUE-ADD

In the above context, it would serve Australia well to position the diversity of the Australian higher education sector as a prominent, if not, unique propositional value for a globalised Australian higher education market. While Australia can justifiably boast of the high-achieving university performance of several of its universities, [a

¹ See Grattan Report “Mapping Australian higher education 2018” for discussion of characteristics of NUHEPs and diversity [2018]. “Of 127 NUHEPs, there are approximately 105 strictly private or independent providers while others are public institutions such as TAFE and in the case of pathway colleges, several are owned either fully or partially by public universities, such as pathway colleges. In 2016, TEQSA identified 54 NUHEPs as not-for-profit and 65 as for profit. “We cannot say exactly how many students are taught in NUHEPs. Where public universities outsource teaching (Section 1.4) the students are counted in the university rather than the teaching institution. With this caveat, in 2016 NUHEPs enrolled nearly 81,000 full-time-equivalent students.¹² It is a big increase on slightly less than 15,000 full-time equivalent students in 1999, but only an 8 per cent market share (see Section 2.2 for more detail on enrolments). ... Fifteen pathway colleges specialise in diploma-level courses. Their purpose is to prepare students for entry into the second year of a university course. Typically, they have a relationship with a specific university, and the diploma curriculum matches that taught in the target university’s first year. Other institutions offer only postgraduate courses, often serving specific occupations with professional admission or development courses. Fourteen NUHEPs are in this category” [Pg 11].

performance not necessarily limited to its sandstone universities], not much is done to identify and profile the success and output of the range of providers within the independent sector. For instance, the independent sector is represented by several HEPs who have operated for more than a century in delivering consistent and successful higher education outcomes in Australia, some building on the back of global affiliations and alliances, long before some universities in Australia were founded. Others representing a range of options in professional, business, management and technology related courses, bring a competitive edge with business acumen and corporate advantage, attracting students who choose them for the specific professional and employment outcomes these institutions are able to market. Yet others, as pathway colleges provide scope for students, especially 'second-chance' students who need tailored and personalised support for transition into the higher degree arena. Independent providers provide a niche such as moderate class sizes and personalised attention, accounting for why many of these providers exceed national averages by QILT data estimates.² By all estimates, the independent sector is set to expand, anticipated in TEQSA's 2015 and 2016 data, which show the largest percentage growth [8%] in student numbers attributed to them, with the not-for-profit sector accruing a 23% increase in overseas students.

Comparing 2015 and 2016, not-for-profit providers had the largest percentage growth in student numbers (by 8 per cent) despite a 6 per cent decline in provider numbers. Universities continue to have the highest proportion of students. However, there has been a gradual increase in student enrolments at other provider types for the past four years. The overseas sector experienced the largest percentage growth in all provider types, with not-for-profit providers having a 23 per cent increase in overseas students from 2015 [TEQSA Statistics 2018, p 11].

The question of diversity is important but it must also be balanced with the solidarity of purpose that consolidates the sector. This is evident by many significant public and private collaborations and initiatives across the sector. What Australia needs is an appreciation across both sides of the current divide of the value of the public/private spaces and the opportunities available to each at the intersections³. As Norton & Cherastidham point out, the public/private divide, is to some degree, artificial. The distinctions are already blurred given the partnerships between universities and pathway colleges and the outsourcing, by universities, of teaching and other related

² See 2017 QILT National Report:

"The largest difference between NUHEI and university students across the five focus areas remains in Learning Resources, with NUHEI students rating this aspect 10 percentage points lower than university students. However, NUHEI students gave higher ratings than university students in other focus areas such as Student Support (5 percentage points), Teaching Quality (3 percentage points), Skills Development and Learner Engagement (both 1 percentage point higher). When comparing results for university and NUHEI students there are several important caveats to consider, including the narrower range of study areas for non-university providers, different population characteristics, and the fact that, while there has been a marked increase since 2015, it is still the case that not all eligible non-university providers chose to participate in 2017".

³ The Higher Education Private Provider Quality Network is a community of practice led by Avondale which facilitates the intersection of private and public expertise.

functions to independent providers. What is especially pertinent in the Grattan Report is the difficulty of determining private and public jurisdictions over student enrolment data. Whereas several colleges are owned by universities, others are public-private partnerships. The Grattan Report “Mapping Australian higher education 2018”, notes that where courses are outsourced to the independent providers, students enrolled in these courses currently count towards university enrolments [11]. But, where, in fact, do these students belong? That is not a question for this review but it is worth noting from this example that while the PCS categories serve appropriate and specific functions, they do not preclude providers across categories to seek collaborations, and these add value to the Australian higher education landscape.

3. WHY AUSTRALIA MUST REFRAME ITS PCS – A LOOK AT GLOBAL TRENDS

[PCS B1.2 , PCS B1.3 and PCS B1.4]

UNIVERSITY and UNIVERSITY COLLEGE STATUS

3.1 Teaching-Focused University Category

Universities, by their large size alone, are not necessarily indicators of high quality. Rather, the strength of university student loads could also pose as its greatest risk! Nor is research alone a valid category upon which university rankings should be based. If universities are not only about the creation but the advancement and dissemination of knowledge, the first challenge lies closer to home in the classroom! As changes to the criteria for universities in the UK Standards testify, the move to recognize ‘teaching’ functions as a fundamental criteria for university status boosted the UK’s University Category profile. The same can be said of similar moves by several countries across the globe. Australia is relatively unusual in not providing a ‘teaching-focused’ University category. Currently the only pathway open to aspiring providers is through the trajectory of Self-Accrediting or transition from University College to University categories. As yet, there are no providers in the University College category and only 1 in the University of Specialisation category. This is a stark difference to the PCS profile of other regions such as the UK, the Pacific, Asia and even Africa.

This submission calls for consideration of a ‘Teaching-Focused’ or ‘Teaching-Engaged’ University Category. The semantics of naming this category may remain a challenge since what we mean by ‘teaching’ has shifted dramatically. If Australia is focused on developing a high-end student experience, an enviable graduate employability profile to produce citizens who can contribute positively to the nation’s social, economic, philosophical, ideological, ethical and political spheres , it must reconsider the mission of universities so as to reclaim and rewrite teaching and learning as a core function of universities. While Research is important, it should not overwhelm all other functions so as to de-stabilize the critical functions of teaching and learning, scholarship and community engagement:- attendant skills for both teacher-scholars and learner-scholars. It is at the interface of these functions that our responsibilities to students can be best discharged. As higher education providers, we have the inestimable privilege not just of serving our students but of serving the

future, through inspiring our students to believe in paying-forward to sustain their futures and that of the generations to come. This should speak to the heart of why higher education matters to a nation. The real work of education happens, at the interface within the intersections of teaching and learning across a variety of evolving contexts and spaces. The Student Experience is paramount! Accordingly, the Threshold Standards were revised in 2015 to become intentionally student-focused, [though no changes were made to the PCS at that time]. It would follow that this Review of the PCS should then ensure that the Category Standards are student-focused to bring it in line with the rest of the Standards. Taking the cue from TEQSA, who has developed a strong student focus, we might do well to consider whether students would stand to gain or lose by the provision of a ‘Teaching-Focused’ category. It would appear that other countries have moved ahead to reward the student-experience, recognizing the risks posed by increasing demands for research being out of step with quality teaching and the student experience.

Australia’s performance in research speaks to its world-class reputation and makes a case for Australia to remain distinctive by driving the importance of research as a criteria for University status. But the question remains, should we not also build towards a world-class ‘teaching-focused’ profile? There is much to be gained by the competitive edge this would provide Australia nationally and globally, in profiling institutions with high-quality teaching, scholarship, community engagement and good governance as critical selling-points to students desperately needing assurance of high-quality teaching to benefit their choices.

This submission appeals for the provision of a ‘Teaching-Focused’ University category alongside a ‘Research’ University category. This is not to suggest that either needs to be exclusive.⁴

3.2 Australia’s PCS Profile

| | |
|---|-------|
| - PCS B1.2 [University], | - 40 |
| - PCS B1.4 [University of Specialisation] | - 1 |
| - PCS B1.3 University College | - 0 |
| - PCS B1.1 Higher Education Provider [HEPs] | - 127 |

Australia’s PCS profile, in contrast to many regions across the globe, appears conservative. Australia believes in quality and the significant level of professional learning and collaborative practice in Australia speaks to the commitment to quality of stakeholders across all PCS categories. Yet, this level of energy and vitality evident by the investment of stakeholders within and between the dominant categories have not seen any significant upgrades in terms of the category standards. Why? If we proffer Australia as a world-class higher education system, should this not be reflected

⁴ See Professor Gavin Moodie. “Civilisation as we don’t know it: teaching-only universities,” *The Conversation*, Jan 2014. His point “Whether or not you support teaching only universities may depend on whether you believe that society’s different needs are best served by having different bodies responsible for different functions and whether those differences should be categorical or continuous” is worth some reflection. <http://theconversation.com/civilisation-as-we-dont-know-it-teaching-only-universities-28505>

in the PCS profile. Does the absence of stakeholders in the University College categories and the low representation in the University categories against three times as many potential stakeholders in the Higher Education Provider Category say something about Australia's lack of confidence in its own stakeholders to deliver to the standards when QILT data alone speaks to the exceptional quality of a good many of these providers? That would be one good place to start!

To consider some benchmarks in this context, it would be advantageous to consider how far other countries have travelled in the PCS as opposed to Australia. The general trend in Europe and Asia has been to enable greater ease of mobility to high achieving providers to access 'University College' and/or 'University' status. If we judge by Table 1 [below] ⁵ Australia has to play catch-up with countries as diverse as the UK, Malaysia, India and Kenya.

Table 1

| | | UNIVERSITY | UNIVERSITY COLLEGE | UNIVERSITY OF SPECIALISATION |
|-----------------------|--|-----------------------------|---|------------------------------|
| MALAYSIA ⁶ | | 20 Public 40 private | 25 private | |
| INDIA ⁷ | | 350 State 154 Private | 129 Deemed Universities [Private or Public] Approx. 335000 Colleges | |
| KENYA ⁸ | | 22 [PUBLIC] 17 [PRIVATE] | 9 [PUBLIC] 5 [PRIVATE] | |
| ENGLAND ⁹ | | 106 | 5 | |
| AUSTRALIA | | 40 | 0 | 1 |

Other nations appear to project an enabling, if not more mature, Provider Category profile. England, with 106 universities has 5 University Colleges while Kenya having almost as many universities as Australia has 14 University Colleges while Australia has none. If we would not build schools to leave them empty, why would we build categories to leave them vacant? There would be little point to provider category standards that are merely ornamental.

⁵ The data for each country was drawn largely from Shah, M & C Nair., 2016 *A Global Perspective on Private Higher Education*, Chandos, , Cambridge, MA, USA and UK

⁶ See Shah, M& C Nair, *ibid*, p. 25

⁷ See Shah, M & C Nair, *Ibid*, p.187

⁸ ; See Shah, M & C Nair., *ibid*, p.27

⁹ https://en.wikipedia.org/wiki/List_of_universities_in_England

From the perspective of stakeholders outside of Australia, Australian higher education could appear to lack depth or seem unnecessarily exclusive and or posing unrealistic gate-keeping expectations for the University College and University categories.

What does Australia stand to lose by its current profile against the 'healthier' benchmarks in Europe and Asia?

The over-determination to focus on the top-tier universities as sole or primary custodians of quality in higher education [determined by their global rankings in research] is misguided. To quote Hazelkorn it "could see the development of world class universities in the south-east corner of [Australia] to the possible detriment of a world class system"¹⁰.

This submission calls for a broadening and enabling approach to auditing against the PCS. Australia needs to do more to actively and intentionally build momentum for high-performing HEPs to build capacity towards achieving self-accrediting, university-college and/or university status.

Australian HEPs represented in the 127 providers have a spectrum of high-performing providers with vision, high-end capability, dynamic teaching and learning environments supported by highly proficient teaching scholars, with evidence of strong performance against significant indicators against the standards. There is significant unharnessed capacity within the HEP category for upgrades to boost Australia's profile as a thriving high-quality higher education system. It would do well to consider how their expertise, resources and motivation can be harnessed to improve Australia's performance against these benchmarks? The HEP category has many good stories to add to Australia's claim of world-class quality. The best way to market this narrative would be through the PCS.

Accordingly, if for those looking in, Australia's PCS Profile looks impoverished, it would not be for want of credible stakeholders desiring access and full participation in these standards.

This submission recommends that the PCS Review bring some intentionality into assuring that the PCS remains relevant and realistic and that it uses this opportunity to determine how high-achieving providers can be recognized appropriately within the PCS and further determine how the PCS can be profiled to provide impetus and motivation to other providers to aspire and achieve the upgrades provided through the PCS.

¹⁰ Hazelkorn, E 'Australia: World Class Universities or a World Class University System?' <http://www.oecd.org/education/imhe/australiaworldclassuniversitiesoraworldclassuniversitys>

4. PROPOSED CHANGES TO 2015 PCS

B 1.1 [HEP], 1.2 [UNIVERSITY], 1.3 [UNIVERSITY COLLEGE] AND 1.4 [UNIVERSITY OF SPECIALISATION]

Having established the context for the importance of acknowledging the diversity of the Australian higher education system, this section recommends changes to the current PCS in the context of the benchmarks discussed in Item 3.

4.1 Structure of the 2015 PCS

The current 2015 PCS is set up as follows:

| | |
|----------------|---|
| PCS B1.1 | set of 4 standards relevant to the general Higher Education Provider Category [B1.1] |
| PCS B1.2 -1.4 | Set of 10 standards for each of the categories - University College [B1.3], University [B1.2] and University of Specialisation [B1.4] |
| PCS B1.5 & I.6 | Set of 2 indicative standards for Overseas University and Overseas University of Specialisation |

This discussion will focus first on the University College, University of Specialisation and University categories, following which it will close with a discussion of the Higher Education Provider Category.

University College, University of Specialisation and University Categories

As indicated, there are 10 standards for each of the following categories **WITH 8 common standards AND 2 discrete standards**

| | | | |
|---|----|-------------------------------|-------------------------|
| PCS B1.2 [University], | 40 | 8 Common Core Standards | 2 Discrete Standards |
| PCS B1.4 [University of Specialisation] and | 1 | | |
| PCS B1.3 University College | 0 | | |

4.2 The Eight Common Core Standards

The eight standards common to the University College, University and University of Specialisation categories are provided in TABLE 2 below and comprise of the following indicators:

Research, Advancement and Dissemination, Sustained Scholarship, Good Practices in Teaching and Learning, Student Services, Community Engagement, Institutional Quality Assurance and State and Commonwealth Support.

These common core standards [Table 2] are critical standards and we propose that these standards are preserved in any revisions to the categories with the provision that evidence of good academic governance, implied in the category standards as a whole, be made explicit.

TABLE 2

| 8 COMMON STANDARDS FOR UNIVERSITY COLLEGE; UNIVERSITY AND UNIVERSITY OF SPECIALISATION | |
|---|--|
| 1. | The higher education provider undertakes research that leads to the creation of new knowledge and original creative endeavour at least in those broad fields of study in which Masters Degrees (Research) and Doctoral Degrees (Research) are offered. |
| 2. | The higher education provider demonstrates the commitment of teachers, researchers, course designers and assessors to the systematic advancement of knowledge. |
| 3. | The higher education provider demonstrates sustained scholarship that informs teaching and learning in all fields in which courses of study are offered. |
| 4. | The higher education provider identifies and implements good practices in student teaching and learning, including those that have the potential for wider dissemination nationally. |
| 5. | The higher education provider offers an extensive range of student services, including student academic and learning support, and extensive resources for student learning in all disciplines offered. |
| 6. | The higher education provider demonstrates engagement with its local and regional communities and demonstrates a commitment to social responsibility in its activities. |
| 7. | The higher education provider has systematic, mature internal processes for quality assurance and the maintenance of academic standards and academic integrity. |
| 8. | The higher education provider's application for registration has the support of the relevant Commonwealth, State or Territory government. |

4.3 THE TWO DISCRETE STANDARDS

Apart from the eight common standards, each category has two discrete standards exclusive to each category. The two discrete standards are intended to differentiate between the 3 aforementioned provider categories. But what is the nature of this differentiation and how different is the University College category from the University of Specialisation category. Standard 2 of the University College Category and Standard 1 of the University and University of Specialisation are closely aligned, though not identical. All three standards [B1.2.1; B1.3.2; B1.4.1] have the provision for self-accrediting status but vary in terms of the demands placed on undergraduate and postgraduate course offerings as opposed to HDR course offerings. The variance is depicted in Table 3 in the following contexts: a) HDR Offerings b) Coursework Offerings c) Self-Accrediting Capability

4.3a HDR OFFERINGS

Research and HDR Performance are critical standards of the university categories. The proposition here requires a case to be made for the University College Category Standards to be regarded as approximating the current University of Specialisation Standards. As Research is part of the 8 Common Core Standards of the university categories, no further justification needs to be provided for University College equating the University of Specialisation standards on this basis. In terms of the 'Two Discrete Standards' the University College and University of Specialisation both have provisions for offerings of HDR degrees in at least **one field** [See Table 3]. Further, both require self-accrediting authority [See Table 3]. This suggests that up to this point in this discussion, both these categories can be regarded as on par in the context of HDR offerings.

4.3b Coursework Offerings

In terms of coursework offerings, there is a wide discrepancy between expectation of the University College and the University of Specialisation, where the former must operate in at least three fields [identical to University category] and the latter can operate in one or two fields. In this context, whereas up to this point, the University College Category has appeared on par with the University of Specialisation, in the context of coursework offerings, it appears to have exceeded the expectations of the University of Specialisation category. In sum, one could argue that there are greater demands on the University College category [See Table 3].

4.3c Self- Accrediting Standard and the 85% Rule

As Table 3 depicts the 85% Rule with regard self-accrediting capability [demonstrated over 5 years] is relevant to both University and University of Specialisation, the former operating in 3 fields and the latter in one or two.

The 85% rule is exclusive in the current standards to both university and university of specialisation but it omits this stipulation in the university college category.

But is this a necessary or credible omission from these standards?

Given that, within the current 2015 PCS framework, there is nothing to stop a provider from acquiring full self-accrediting status and also fulfilling the 85% rule in either one or three fields, even before making any nominations for the University College category, such an omission is limiting.

There is also scope to consider dispensing with the five-year time frame.

TABLE 3B

Mapping of current PCS to COURSEWORK, HDR AND SA Provision

| Delivery of Coursework and HDR Stipulations | UNIVERSITY COLLEGE | UNIVERSITY OF SPECIALISATION | UNIVERSITY |
|--|---|---|---|
| <p>UoS B1.4.1</p> <p>The higher education provider self-accredits and delivers undergraduate and postgraduate courses of study that meet the Higher Education Standards Framework in <u>one or two broad fields of study only</u> (including Masters Degrees (Research) and Doctoral Degrees (Research) in these <u>one or two broad fields of study it offers</u>).</p> <p>UC B1.3.2</p> <p>The higher education provider self-accredits and delivers undergraduate and postgraduate courses of study that meet the Higher Education Standards Framework across a range of broad fields of study (including Masters Degrees (Coursework) in at least three broad fields of study and Masters Degrees (Research) and Doctoral Degrees (Research) in at least <u>one of the broad fields of study it offers</u>).</p> | <p>*</p> <p>UNIVERSITY COLLEGE ANTICIPATES THREE FIELDS IN COURSEWORK AND ONE FIELD IN HDR; HENCE UC MEETS MINIMUM REQUIREMENTS FOR UNIVERSITY OF SPECIALISATION IN HDR AND UNIVERSITY STANDARDS FOR COURSEWORK</p> | <p>*</p> | |
| STIPULATIONS FOR SELF-ACCREDITING AUTHORITY AND HDR OFFERINGS IN ONE FIELD | UNIVERSITY COLLEGE | UNIVERSITY OF SPECIALISATION | UNIVERSITY |
| SELF-ACCREDITING PLUS MINIMUM ONE FIELD COURSEWORK | | YES | |
| SELF-ACCREDITING PLUS MINIMUM ONE FIELD HDR | YES | YES | |
| SELF-ACCREDITING PLUS MINIMUM THREE FIELDS COURSEWORK | YES | | YES |
| SELF-ACCREDITING PLUS THREE FIELDS HDR | | | YES |
| 85% Rule Self-Accrediting Capability | | The HEP has been authorised for at least the last 5 years to self-accredit at least 85% of its total course of study, including Masters and doctoral Degrees [Research] in the [one or two] broad fields it operates in | The HEP has been authorised for at least the last 5 years to self-accredit at least 85% of its total course of study, including Masters and doctoral Degrees [Research] in at least three broad fields of study |

5. PROPOSAL TO UPGRADE UNIVERSITY COLLEGE CATEGORY TO UNIVERSITY OF SPECIALISATION

Based on the above, this submission proposes that the current University College Standards be upgraded with the 85% self-accrediting rule and be merged to function within the University of Specialisation Standards. In this context, this submission calls for a review of the appropriateness of the current University College category as a transitory category and recommends rather that the University of Specialisation category function as both a standalone category as well as a transition category in a future model.

In summary, this submission argues for the case that the basic premise of the **University College** category, assuming the aspirant has achieved both self-accrediting status and the 85% capability, is that **it operates on three fields of education and at least one field for HDR**. **University of Specialisation** on the other hand, requires that the provider **operate on one or two fields in both coursework and HDR**. The bar then for both categories **is a minimum of one field in Coursework as well as HDR** and Research capability.

Given that the current University College and University categories have more in common in relation to the Standards and distinctive only by two indicators, this submission draws attention to the prospect of escalating the current PCS for University College to University of Specialisation based on the following rationale:

- That the University College and University of Specialisation are identical in several ways:-
 - a. Both categories require a minimum of self-accrediting capability and delivery of higher education in undergraduate and postgraduate coursework with a minimum of one HDR Field
 - b. Both share a common core of 8 Standards
- Where the variance is significant, it is in the context of the fields of study stipulation [3 fields for University College and 1 or 2 for University of Specialisation]. While the 1 or 2 fields is appropriate for the University of Specialisation, the three fields stipulation for University College are identical to University category stipulations for coursework degrees. By this token, one could argue that the demands of the University College category are relatively more stringent than that of the University of Specialisation. Yet, in the context of the current standards, the former remains a university aspirant when it should more rightfully qualify for a university of specialisation.

As indicated, this submission recommends escalating the current University College requirements to a new category within the University of Specialisation category enabling those who achieve the standards under the current B1.3 University College Category as eligible to attain University of Specialisation status.

6. University College 2015 Model [B1.3]

The above argument has just made the 2015 University College Standards redundant by escalating the Standards forward and aligning them to the University of Specialisation.

The next proposition is for a new model for University College with the provision for self-accrediting and teaching-focused standards. Given the context established in the early part of this submission for profiling the rich diversity within the Higher Education Category, it remains for the Standards to provide incentives to high-performing providers to aspire for the minimum of University College status. This can be achieved by rolling the Self-Accrediting Standards for full authority into the University College category. The University College Provider Category would serve as standalone category for those who have achieved full self-accrediting authority. This would also be a viable option for those wishing to be teaching-focused institutions. By this token, any provider who achieves full self-accrediting authority would attain University College status.

7. A PROPOSED MODEL for U College, UoS and U

TABLE 4

| UNIVERSITY COLLEGE | UNIVERSITY OF SPECIALISATION | UNIVERSITY |
|--|---|---|
| SELF-ACCREDITING AUTHORITY ACHIEVED | SELF-ACCREDITING AUTHORITY PLUS 85% RULE | SELF-ACCREDITING AUTHORITY PLUS 85% RULE |
| THREE FIELDS OF STUDY COURSEWORK | Minimum of ONE FIELD COURSEWORK AND Minimum of One HDR Field | THREE FIELDS |
| HIGH SCHOLARSHIP [IF TEACHING FOCUSED] AND/OR RESEARCH PERFORMANCE [TEACHING & RESEARCH]; LEARNING & TEACHING; COMMUNITY ENGAGEMENT; STUDENT EXPERIENCE; INSTITUTIONAL QUALITY ASSURANCE | RESEARCH, ADVANCEMENT & DISSEMINATION; SCHOLARSHIP, LEARNING AND TEACHING, COMMUNITY ENGAGEMENT; STUDENT EXPERIENCE; INSTITUTIONAL QUALITY ASSURANCE COMMONWEALTH & STATE | RESEARCH, ADVANCEMENT & DISSEMINATION; SCHOLARSHIP, LEARNING AND TEACHING, COMMUNITY ENGAGEMENT; STUDENT EXPERIENCE; INSTITUTIONAL QUALITY ASSURANCE COMMONWEALTH & STATE |
| GOOD GOVERNANCE | | |

8. Higher Education Provider Category 2015 Model [B1.1]

Earlier in this submission, the importance of recognizing the diversity of providers in this category was clarified. It is hoped that the PCS Review would begin with a fine-grain analysis of the current providers to recognize the diversity within the current higher education provider landscape to actively and intentionally provide incentives for high-achieving providers to aspire towards upgrades on the PCS spectrum. While the sector needs a clear up-grade path, the current B1.1 one-size-fits-all model lacks scope for specialisation and differentiation.

What is needed is a fit-for-purpose model that provides greater scope for high-achieving providers to exercise greater self-determination and flexibility and nominate towards alternative pathways:

- Colleges should be provided with greater flexibility to identify within clusters that reflect their unique mission.
- Institutions should have the choice to nominate to apply to one category of specialisation for e.g. a] Liberal Arts Colleges b] Theological Colleges b] Technical Colleges [focusing on business, commerce and industry partnerships] c] Colleges of Professional Services [Hospitality etc.] or d] Colleges of Specialisation; and
- with provisions for relevant upgrades to University College [with full self-accrediting authority] and/or University status as appropriate. These clusters would allow greater potential also for collaboration and benchmarking purposes.

TABLE 5

| PROVIDER CATEGORY REVISIONS | | | | | |
|-----------------------------|------------------------------|--|--|------------|---------------------------------------|
| PATHWAY COLLEGES | COLLEGES OF HIGHER EDUCATION | UNIVERSITY COLLEGE | UNIVERSITY OF SPECIALISATION | UNIVERSITY | OVERSEAS UNIVERSITY |
| | | <ul style="list-style-type: none"> - Full Self-Accrediting Authority - Teaching-Focused Category | TRANSITION TO UNIVERSITY CATEGORY WITH OPTION AS STANDALONE CATEGORY | | OVERSEAS UNIVERSITY OF SPECIALISATION |

9. RECOMMENDATIONS

This submission proposes a set of 7 Recommendations:

1. That consideration be given to reorganizing the PCA Category structures and standards to identify high performing providers for the University College and University categories and to establish incentives for a mentoring system in the intersections between categories to facilitate successful upgrades to appropriate categories;
2. That consideration be given to conducting a fine-grain analysis of the current providers to recognize the diversity within the current provider landscape so as to determine a more flexible and intuitive category of classification for colleges of specialisations within the B1.1 PCS
3. That consideration be given to profiling 'teaching-focused' as a category equivalent to research in the University College and/or University category targeting the high ranking performance of providers in, among other things, teaching, scholarship, student experience, employability, skills development and graduate outcomes;
4. That consideration be given to integrating the current University College Category Standards with the University of Specialisation, recognizing the common standards these categories already share to position the University of Specialisation [rather than the University College category] as the transition category for university status. That provision for the University of Specialisation to function as a standalone category for institutions operating in teaching, HDR and research in **at least one field** be retained. That the 85% SA capability rule [without the 5 Year context] be retained [to apply to the transition to university aspirants within this category] and thereby levelling the current difference between B1.3 and B1.4 categorie;
5. That the University College Category be completely reframed to position itself as a 'teaching-focused' category with in-built provision for full self-accrediting authority to incentivize greater commitment among providers to evidence quality and advance Australia's higher education profile and to this effect that the current standards for full self-accrediting authority be prioritized for this category;
6. That consideration be given to developing unique standards for pathway colleges;
7. That Greenfield Applications for university status be limited and instituted only as needed for national interests by government stipulation based on select criteria and university PC Standards and that all other greenfield applications be restricted to applications for PCS B1.1 [HEP Category] to equalize the criteria expectations for sound evidence of performance against the standards to any one category in the PCS.

10. SUMMING UP

The above discussion is arguing for consideration for the following four outcomes:

1. Conducting a fine-grain analysis of Provider Category B1.1 Higher Education Provider Category to distinguish between clusters of providers and provide flexibility for providers to band within clusters as well as seek opportunity to provide incentives to providers for achieving full self-accrediting authority and upgrades to University College category.
2. Implementing a remodelled University College category by rolling the current self-accrediting standards into this category with developing provision within this category for 'Teaching-Focused' providers to access University College status.
3. Implementing a University of Specialisation review to consider escalating current providers operating in a minimum of one field, who have full self-accrediting authority and who have also achieved the 85% self-accrediting capability rule to function within this category, placing also no time restrictions for transition to University status. This category would then function also as a standalone category.
4. Inaugurating provisions for a 'Teaching-Focused' University category standards [with robust advancement and dissemination indicators targeting high-level scholarship output, research output relevant to learning and teaching, community engagement and graduate outcomes] developed with expectations for high-bar measures in place to position the Teaching-Focused Universities in Australia as world-class providers and that this category be differentiated from the proposed University College 'Teaching-Focused' Category by limitations to a minimum of one field in the University College category and three fields in the University category.

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