

Batchelor Institute response to ‘Review of the Higher Education Provider Category Standards – Discussion Paper, December 2018’.

Background

The Batchelor Institute has been constituted by legislation as *“an educational institution for the tertiary education of indigenous people of Australia and the provision of other educational and training programs and courses, and facilities and resources for research and study”*.

As a specialist First Nations tertiary education provider we work to meet the diverse education and training needs, aspirations and interests of Aboriginal and Torres Strait Islander peoples, providing a place and space for learning and engagement across language groups and country. In this way, Batchelor Institute becomes a connecting point for students and research candidates, opening the door to new knowledges and qualifications, across Higher Education, Research and VET sectors.

We provide the following brief responses.

1. What characteristic should define a ‘higher education provider’ and a ‘university’ in the PCS?

The characteristics and criteria for HEPs and universities as outlined in Part B of the Higher Education Standards Framework are generally appropriate at the high level. However the detail of criteria limit the opportunity for existing HEPs to transition into a university category, thus limiting Australian university diversity. This is explained further below.

2. Are the PCS fit for purpose in terms of current and emerging needs? Why?

The current grouping of 137 HEPs when compared against a total of 43 universities (across 5 available universities sub categories) signals both a high degree of variation in the nature, focus, size and scale of HEPs and a very static, restrictive and potentially unresponsive category settings for the university grouping. This observation is reinforced by the fact that since the establishment of multiple university categories, no Australian University Colleges, Australian University of Specialisation, Overseas University of Specialisation has been added to the Provider Register beyond the 1 University of Specialisation and 2 Overseas Universities approved to those categories through the initial registration processes.

Whilst we acknowledge the imperative to protect the ‘university’ name and brand, we consider the current settings and mechanisms for (i) moving to university status from a HEP starting point, (ii) moving from one university category to another, and indeed (iii) commencing as a greenfield university is unnecessarily limiting tertiary and university sector diversity. This is particularly important in the context of the contribution Australia higher education sector makes to the national economy and the very high potential to realise further international markets through a greater number of specialist universities.

On this point we would argue that the current PCS is not fit for purpose, both in terms of meeting current needs and for enabling future needs. We share the view of the Australian Industry Group (AIG)ⁱ that “Given the increasing diversity of learner needs it is desirable to have a greater variety of provider types within the tertiary education system.”

3. Should some categories be eliminated or new categories be introduced? What should be the features of any new categories?

As mentioned above the focus, level of offerings, size and scale of the 137 registered HEPs varies considerably. Further differentiation in HEP categories should be examined and presented for consideration from this review. Further differentiation in HEP types is important as a potential means for HEPs to step through stages as they transition to University of Specialisation or University College categorisation. One important differentiation, is experience in self accrediting. Another would be the HEPs engagement in research and provision of

research training qualifications. These signify academic governance systems and practices associated with all Australian universities rather than all other HEPs. They provide a starting point to consider further nuancing of HEP and universities categories outside of the Australian University category.

4. Do specific categories need to be revised? How?

Yes, as above, greater differentiation should be available to the broad 'catch-all' HEP category.

In addition, and further to our view that increased university provider diversity would be an enriching national agenda to pursue, Batchelor Institute sees the current criteria setting for University of Specialisation to be inappropriately limiting. The criterion of "only one or two broad fields of study" requires TEQSA to refer to the Australian Bureau of Statistics' Australian Standard Classification of Education (ASCED) – at the four digit FoE level - to define fields of study. This effectively limits the term 'specialisation' to pre-defined ABS reporting fields as opposed to equally valid alternative determinants. Our perspective is that specialisations can and should be imagined in other forms in order to:

- (i) enable growth, status recognition and pathway opportunities for higher education and research entities that focus on multidisciplinary and/or professional and/or thematic education and research.
- (ii) ensure viability, market share and course growth in broader fields of relevance to the provider rather than restricting to growth only within the FoEs.
- (iii) limit the potential for perverse outcomes due to course nomenclature needing to fit within a limited FoE framework.
- (iv) be truly open to sector diversity and nationally and internationally significant aspirations of industries, governments and peoples for niche/specialist education and research endeavour.

A nationally significant aspiration of Indigenous Australians for example, for many decades now, has been to see an Indigenous/First Nations University established in Australia. NATSIHEC and others before it have led this call over the decades. Naturally a national Indigenous university - formed by any pathway - would sit alongside, and both compliment and extend upon, the existing Indigenous education programs of all Australian universities.

However an internationally relevant First Nations university (of specialisation) in Australia could only be possible under the current criteria if its offerings were limited to just one or two 4-level FoEs. Whilst there may be some foreseeable shift in the Field of Research (FoR) classifications to potentially include a 2-4 digit FoR for Aboriginal and Torres Strait Islander research, one would not assume a similar adjustment would flow through to an FoE listing change. Either way, it would be unreasonable for an entity to have to wait for such an FoE alignment in order to move forward with university aspirations, particularly in circumstances where all other specialisation criteria are being met. In the case of a transitioning of Batchelor Institute, or the creation of a greenfield entity, this aspiration has, and will be again, a nationally defining challenge and opportunity for Indigenous education and Indigenous sovereignty within Australia. We argue that a specialist theme of "Indigenous / First Nations education and training" is sufficiently strong and relevant, and of significant international and national importance, to be considered a specialisation.

This national direction and need was reinforced this week with the release of the UA First Annual Reportⁱⁱ that shows a failure across the academy as it is currently configured under existing categories to deliver outcomes for particular student cohorts such as Indigenous Australians, low SES and other equity groups.

An analysis of both the core metrics and anecdotal evidence provided by Indigenous scholars reveal universities tend to absorb and accommodate Indigenous aspirations within their fabric

but do not prioritise them in the allocation of resources for example. The entry of specialist higher education providers that focus on the needs of equity groups as core business must necessitate a rethink of the current HEP categories if the achievement of outcomes are to be prioritised and realised.

There may be other current and emergent thematic interests of national significance that likewise represent industry and/or societal priorities beyond a limited selection of ABS reporting fields.

Additional Notes

A challenge for emerging specialist providers is to overcome a lack of overt mentoring mechanisms available to, or indeed required by, new players in the market. Academic and corporate governance mentoring relationships with established universities would seem essential in achieving targeted, specialist growth and greater diversity among HEP and university providers. Whereas the template for university creation two-three decades ago provided for staged, mentored and supportive arrangements between governments and other pre-existing universities, the template and resourcing for sponsoring specialist and new greenfield universities has not translated into our contemporary standards-based provider registration era.

In lessons from overseas, the Wananga in New Zealand are recognised as tertiary institutions under section 162 of the NZ Education Act 1989. As such, wananga are regarded as the peers of universities, polytechnics, and colleges of education. Under the Act: *A wananga is characterised by teaching and research that maintains, advances, and disseminates knowledge and develops intellectual independence, and assists the application of knowledge regarding ahuatanga Maori (Maori tradition) according to tikanga Maori (Maori custom).*

Other international examples of First Nations tertiary institution registration types, and their relationships with partnering university or the like might also provide insights into mechanisms and arrangements that could support HEP movement through to specialist university registration.

Conclusion

For the sector to respond to emergent opportunities it must be open to the revision of the Category Standards and, as Robert Griewⁱⁱⁱ put it, 'engage beyond the club'. His suggestion was for consideration of "non-research based universities, polytechnic universities or other new categories, [which previously] have been stopped for political reasons".

Our vision for the future Australian higher education sector is for greater diversity in universities - in part through an increased number of specialist universities. We see this has the potential to further expand international markets and international collaborative education and research arrangements, subject of course to new specialist universities meeting all necessary provider registration standards.

We look forward to further consultation as options for changes to the Higher Education Provider Category Standards become clearer.

ⁱ The Australian Industry Group (February 2019) Realising Potential – Solving Australia’s tertiary education challenge. Sourced Feb 2019 at https://cdn.aigroup.com.au/Reports/2019/REALISING_POTENTIAL.pdf

ⁱⁱ Universities Australia (2019) Universities Australia Indigenous Strategy First Annual Report. Sourced March 2019 at <https://www.universitiesaustralia.edu.au/Media-and-Events/submissions-and-reports/Indigenous-Report>

ⁱⁱⁱ Griew, R (April 2018) Three lessons from a decade of higher education policy stalemate. Sourced Feb 2019 at https://www.nousgroup.com/wp-content/uploads/2018/04/Three-lessons-from-a-decade-of-higher-education-policy-stalemate_Robert-Griew_April-2018.pdf