



Professor Nick Klomp
Vice-Chancellor & President
CQUniversity Australia
Chancellery Building 1
Bruce Highway, ROCKHAMPTON. 4701

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Emeritus Professor Peter Coaldrake AO
Reviewer
Review of Higher Education Provider Category Standards
Email: PCSReview@education.gov.au

Dear Emeritus Professor Coaldrake,

CQUniversity submission - Review of Category Review of the Higher Education Provider Category Standards

CQUniversity welcomes the opportunity to contribute to the review of the Provider Category Standards (PCS) that you are currently leading. This review presents a welcome opportunity to streamline the PCS requirements and to ensure that they reflect contemporary notions of what it is to be a university in Australia.

Below you will find CQUniversity's responses to the review questions posed in the review paper.

What characteristics should define a 'higher education provider' and a 'university' in the PCS?

With regard to the higher education provider (HEP) category, there is no need for a separate set of criteria beyond those already set out in Higher Education Standards Framework (Threshold Standards 2015) as requirements of registration. Any additional criteria risks increasing the burden of regulation by unnecessarily increasing the criteria that must be met at (re-)registration.

The definition of a university in terms of research and course delivery in three fields of education is arbitrary. Notwithstanding, CQUniversity does not support the creation of a 'teaching only' university category. A teaching-only category is not consistent with the Australian public's understanding that an Australian university conducts research. Furthermore, international students coming to Australia would expect that Australian universities conduct research since this is understood internationally to be a core function of a university.

Rather than defining universities in terms of three fields of education, universities could instead be re-defined as undertaking comprehensive research and offering undergraduate and postgraduate courses in a range of research fields.

The type and level of research should be linked to national and international benchmarks as currently detailed in the Excellence in Research Australia (ERA) framework.

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

The current PCS are unnecessarily detailed. The PCS should state in a clear, concise manner the characteristics of universities and other categories other than HEPs. There is no need for a separate set of criteria for HEPs since this should be the default categorisation for any provider that meets the registration requirements of the Threshold Standards.

The criteria within the PCS require simplification. Criteria such as requirements for sustained scholarship are unnecessary and overcomplicate the HESF given there is an existing requirement for research.

The title 'University' should continue to be protected and be linked to research. CQUniversity does not support the notion of 'teaching only' universities. University research provides community benefits, particularly in regional communities. Research also helps to underpin the quality of learning and teaching in regional universities. CQUniversity supports the continued requirement for a university to deliver undergraduate and postgraduate courses since this ensures that there is the breadth of delivery that the Australian public would expect from a university.

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

CQUniversity questions the need for a university college category, noting that no such college has been approved since TEQSA came into operation. It may be preferable to approve a new university on a provisional basis.

It is not clear as to the benefit of a 'pathway college' category as proposed in the discussion paper since the HESF allows for the approval of pathway colleges.

Do specific categories need to be revised? How?

CQUniversity's key concerns regarding specific categories have been addressed above. In summary:

- The separate HEP criteria should be eliminated. HEP status should be the default criteria for meeting Threshold Standards registration and this could be stated simply in the Tertiary Education Quality and Standards Act 2011 (TEQSA Act).
- The definition of the university category should be revised to link to fields of research rather than fields of education since this is a more relevant benchmark if universities are required to undertake research as a core differentiator from other HEPs. There should be national and international benchmarks concerning level and quality of research, and at present in Australia such benchmarks are linked to ERA.

How would the needs of providers, students, industry, regulator and broader public interest be served by your suggested changes to the PCS?

A simplification of PCS for HEP would reduce regulatory burden whereby multiple PCS criteria are currently applied in re-registration. This would include the elimination of unnecessary elements of PCS concerning scholarly activity in a context where universities are already required to undertake research and the notion of 'sustained scholarship' is ill-defined.

The linking of university category requirements to quality national and international research would protect the notion of a university in Australia. It would do this by ensuring that to be recognised as a university in Australia, a HEP would need to evidence research quantum and research quality that met international benchmarks.

Thank you for the opportunity to contribute to the review of the PCS. Should you have any questions regarding the contents of this submission, please contact Professor Helen Huntly, Provost via email at h.huntly@cqu.edu.au.

With kind regards,

A handwritten signature in black ink that reads "Nick Klomp". The signature is written in a cursive, slightly slanted style.

Professor Nick Klomp
Vice-Chancellor and President
CQUniversity