

## **Curtin University Submission - Review of the Higher Education Provider Category Standards**

Curtin University welcomes the opportunity to provide a submission to the Review of the Higher Education Provider Category Standards (PCS).

**Characteristics defining a 'university'.** As noted in the Discussion Paper, 'Australia has come to conceptualise universities as places for both teaching and research. These two fundamental features have become synonymous with the title 'university' and have contributed to the good reputation of Australia's universities for high quality teaching and research' (*Review of the Higher Education Provider Category-Discussion Paper*, p11). It is critically important that any consideration of the provider categories ensures that the category of Australian University retains global recognition of the key characteristics of Australian universities in meeting the highest standards of quality assurance in teaching, research, community engagement and leadership. Other items of consideration from Curtin's perspective include:

### **Teaching only universities**

Curtin does not support the development of 'teaching only' universities. Universities by their nature undertake research that leads to the creation of new knowledge and demonstrated sustained scholarship that informs teaching and research (*HESF Part B*). While much has been said of the Productivity Commission's finding that there is little evidence to support the teaching-research nexus, the teaching-research nexus continues to be a 'common feature of respected universities internationally' (Bradley, D, (2008) *Review of Australian Higher Education*, p.124 as cited in *Review of the Higher Education Provider Category-Discussion Paper*, p12) and informs continuous improvement in course delivery. The importance of university-based research continues to impact on the international ranking of Australian universities and Australia's reputation for excellence in higher education.

### **Quantity and quality of research**

Rather than having rigid definitions in the PCS regarding the quantity and quality of research within each broad field of study used for determining university status, it may be useful for TEQSA to benchmark with other international agencies regarding approaches. For example, as was noted in the Discussion Paper, with the practice by New Zealand regulatory authorities that ensures international standards of research are met by their universities.

### **Innovation and flexible delivery**

The characteristics of innovative and flexible delivery of higher education practices have been part and parcel of a university's quality practices under the HESF and TEQSA's registration process. For example universities have been applying emerging concepts to course design, micro-credentials, stackable credentials and pathways as evidence of innovation and catering for a diversity of students' needs and expectations.

### **Other categories of non-self-accrediting higher education providers**

Other categories of non-self-accrediting higher education providers, including those that offer diplomas and foundation pathways, can and do fulfil educational outcomes for a diverse range of students. There is potentially a greater role for TEQSA in regulation of new providers within a classification process which grants 'university' status and self-autonomy only to those institutions that meet the key standards of teaching, research and leadership. Further

streamlining of the process through to Self-Accrediting Authority (SAA), similar to what TEQSA has initiated with low-risk self-accrediting providers, could be considered as part of the classification process.

### **Elimination of some categories**

As noted in the Discussion Paper, the category of Australian University College is misleading in the requirements for progression towards Australian University. As there are no providers in this category, Curtin recommends eliminating it from the PCS. While we have no objection per se to the Australian University of Specialisation, and as only one provider (University of Divinity) is registered in this category, it may merit consideration to include discipline specialisation within the context of the Australian University category, with these institutions also required to have both teaching and research to be considered as a university. Overseas universities that operate in Australia could also be considered as a subset of the Australian University category as requirements are identical, with the additional requirement of the overseas university having accreditation from the home country. Having it as a subset of the Australian University category would continue to signal to the world that Australia is willing to have reputable institutions operate in Australia in line with TEQSA standards. As only two universities are registered in this category, with one (University College London) no longer offering courses, moving it to a subset of the Australian University category is worth consideration. Overseas University of Specialisation should be dropped as a category. There are no institutions registered and should opportunity arise in the future they could be considered as part of the Australian University category.

As also noted in the Discussion Paper, Curtin agrees that the implication for existing universities from new entrants in accessing public funds needs to be monitored.

In summary, Curtin recommends two Higher Education Provider Categories:

**Higher Education Provider** – with clear progression processes for those institutions wishing to transition to the Australian University category; and

**Australian University** which will include subsets for university discipline specialisation, e.g. the University of Divinity, which have both teaching and research and overseas universities.

Curtin appreciates the opportunity to have input into this review and looks forward to the final review report later this year.