

Professor Arshad Omari
Senior Deputy Vice-Chancellor



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JOONDALUP CAMPUS

270 Joondalup Drive, Joondalup
Western Australia 6027
☎ 134 328

www.ecu.edu.au

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Discussion Paper on the Higher Education Provider Category Standards Review – response from Edith Cowan University

The following submission is made on behalf of Edith Cowan University (ECU) and is intended to contribute to the Review of the Higher Education Provider Category Standards.

Consideration of other reviews

As the Discussion Paper notes, the Provider Category Standards (PCS) review must be cognisant of other policy developments and reviews currently being undertaken, and in particular the Australian Qualifications Framework (AQF) review. It is important that this co-ordination is ongoing, from the consultation stage through to the implementation of changes.

The University title and its defining characteristics

The term 'University' is synonymous with high quality tertiary-level education and protection of the Australian university "brand" is paramount.

The **Australian University** Provider Category comprises institutions with clear functions and outcomes, in contrast to the tiered and self-defining systems in countries such as the United States. The PCS sets minimum requirements for the categorisation of providers as universities, and consideration needs to be given to replacing these with a more basic, and more stringent principle: that providers categorised as universities must offer courses across a wide breadth of disciplines, at both undergraduate and postgraduate level, and where research activity is evident in all the disciplines taught. Research needs to be a core function of the university.

The unused provisional Provider Category '**Australian University College**' should be deleted, as it has proven to be unnecessary and has the potential to dilute the value of the term 'University'.

Consideration should be given to deletion of the provider category '**Australian University of Specialisation**'. This too dilutes the value of the term 'University' and since it requires research in one or two fields only, it fails to meet the requirement for breadth in teaching disciplines and research, articulated in the principle above. The University of Divinity, whose name was established through an act of the Victorian Parliament, is the sole provider in this category.

Segmenting the Provider Category 'Higher Education Provider'

'**Higher Education Provider**' is often used as an umbrella term, which includes universities, and as such, this Provider Category is unhelpful. Its title needs to change.

The non-university provider group (127 providers) could be differentiated based on any one of the following criteria: i) breadth of disciplines in course offerings; ii) the AQF levels of the courses offered; or iii) the proportion of courses that are self-accredited.

A new Provider Category '**College**' would be a suitable way to recognise a limited number of providers with breadth in their academic profile, teaching across a wide range of AQF levels and a high

proportion of self-accredited courses. Since the term 'College' would be applied to providers with limited or no research activity, there would no longer be a case for considering a 'teaching-only university' category: a university must always conduct research.

Progression to self-accreditation

The PCS should facilitate the progression of providers to self-accreditation authority status. However, given the limited resources of TEQSA, assessments of future capability in new fields represents a significant challenge. In order to manage risk, the award of self-accreditation authority status must be based on *evidence of mature academic governance practices* and *history of capability*. Self-accreditation authority status should be provisional and subject to withdrawal, with a formal assessment after three to five years.

VET and HE Providers aligned with the integrated AQF

Consideration should be given to establishing a Provider Category for providers meeting an emerging need for improved training options for the para-professions, in support of Australia's future technology-led knowledge economy.

A Provider Category: '**College of Specialisation**' would recognise the overlap between vocational education and higher education at AQF levels 5 and 6 and provide proper market visibility for those 'dual-sector' providers focusing on training in a limited range of disciplines for the para-professions.

The 'right number' of universities

The Discussion Paper notes that there has been significant growth in higher education participation in recent years, while lamenting the lack of take up of the PCS progression stage ('Australian University College') and the limited inroads made by overseas universities. The implication is that the PCS needs to better facilitate an increase in the number of universities, in order to offer capacity and choice to meet increasing demand for higher education and changing patterns of learning.

The evidence is that the university sector has responded well to increased demand and emerging ways of learning, without the need for "new players" in the market. Universities including ECU have adapted content, pedagogy and assessment methods in curricula, while Work Integrated Learning and advanced technologies have been successfully integrated into course delivery.

Australian universities have extensive networks, connecting with communities, industries and other education providers. It is important to recognise that public Australian universities in particular, benefit society and the economy in a range of ways, that new private or overseas universities would not.

The number, and diversity, of universities currently operating in Australia, is appropriate to meet the current and future needs of students, industry and the Australian economy.

It is likely that the limited success of overseas universities in Australia is a result of limited profitability, rather than barriers or disincentives to investment. Further incentives to attract overseas universities need to be carefully considered to avoid disadvantaging Australian higher education providers. The total number of overseas universities operating in Australia should be capped.

Further information about this submission

If you require further information or clarification, please contact Steven Newman, Manager, Strategy and Performance, by email: s.newman@ecu.edu.au or by telephone: (08) 6304 2296.

Yours sincerely



Professor Arshad Omari

Senior Deputy Vice-Chancellor