

Review of the Higher Education Provider Category Standards

March 2019

Submission to the Review by JMC Academy

1. Summary

The main tenet of JMC Academy's submission is that the title of University of Teaching should be available to quality teaching and student focused higher education providers who are operating in industry and community areas where research for new knowledge has a lesser priority than developing the skills of individuals, for example in the creative industries.

This, in the opinion of JMC, could be achieved by simply replacing the underutilised category of University of Specialisation with University of Teaching and be defined as:

1. The higher education provider has been authorised to self-accredit its higher education degrees for a period of at least one registration period
2. The higher education provider demonstrates that it has regard to the principles of good governance
3. The higher education provider has at least 1,000 full time equivalent higher education students
4. The higher education provider's application for registration as a University of Teaching Specialisation has the support of the relevant Commonwealth, State or Territory government

2. The JMC Academy

The JMC Academy was established in 1982 by John Martin Cass to meet the demand for qualified professionals in the entertainment technology industry. Currently JMC has campuses in Sydney, Melbourne and Brisbane, with 1700+ student enrolments and offers Higher Education Degrees and Diplomas in Music, Songwriting, Audio Engineering, Film and Television Production, Entertainment Business Management, Digital Design, 3D Animation and Game Design all now regarded as being part of the Creative Industries.

Prior to becoming a higher education provider in 2005, the JMC Academy had partnerships and articulations with several Australian universities including the University of Sydney, University of Western Sydney, Macquarie University, Southern Cross University and the University of New England

The JMC Academy is registered with TEQSA¹ and categorised within the Provider Category Standards as a non-self-accrediting Higher Education Provider (HEP).

¹ <https://www.teqsa.gov.au/national-register/provider/jmc-pty-limited>

The mission of JMC Academy is to advance knowledge and educate students in creative industry technology and related areas of scholarship, enabling them to reach their full personal and career potential. The JMC Academy is dedicated to providing its students with a higher education that combines rigorous academic study and the opportunity to develop their professional practice with the support and intellectual stimulation of a diverse campus community.

The JMC Academy seeks to develop in each member of the JMC community the ability and passion to work wisely, creatively, and effectively. In this way JMC Academy graduates can make a valuable and sustainable contribution to their community, the nation and the world.

JMC Academy's ultimate focus is to deliver inspiring and technologically sophisticated teaching programs, that are widely recognised, highly regarded and which cater to the global needs of the Creative industries.

3. The Creative Industries

Although the term creative industries is more common today it still often requires some explanation. To JMC, the creative industries comprise those industry sectors which have their origin in individual creativity, skill and talent, and which have a potential for wealth and job creation through the generation and exploitation of intellectual property. The creative industries include, but are not restricted to, professions and areas of study such as advertising, architecture, design, electronic games, film, music, performing arts, publishing, radio, television and visual arts. As such it encompasses a wide range of endeavours that have the potential to utilise highly innovative, rapidly evolving global communication strategies resulting in expansive engagement with an increasingly diverse Australian and international audience.

The creative industries have strong intellectual knowledge-based pursuits that contribute to the dynamics of society. Through their academic nature they help shape society and are an important means of academic and creative expressionism. Their creative nature also helps define and shape modern Australian culture. Media such as music, film and performing arts contribute to Australian culture through their innovative approach and their ability to influence popular society.

The creative industries are primarily a highly skills-oriented set of industries revolving around arts that are rapidly expanding and becoming increasingly important to both state and national governments in Australia. According to recent research by the Bureau of Communications and Arts Research², cultural and creative activity contributed \$111.7 billion to Australia's economy in 2016-17 which equates to 6.4% of GDP. The creative industries specifically had a gross added value of \$77.8 billion. The convergence of technologies, the increase of distribution channels, cross-platforms and inter-media opportunities has allowed for the creative industries to also significantly contribute to the economic success of other industries.

The creative industries are consequently an important knowledge based area for the Australian government that has considerable potential. Like other innovative industries it is in continuous need of a better qualified and more highly skilled and innovative workforce. In this regard the JMC Academy is fully supportive of the paragraph in the PCS discussion paper which states

The higher education sector will need to continue to innovate in order to respond to emerging needs and challenges brought about by globalisation, international mobility, technological advancements, demographic shifts, the changing nature of work, continued massification of higher education, and increasing competition in international education.

² <https://www.communications.gov.au/departmental-news/economic-value-cultural-and-creative-activity>

4. Provider Category Standards (PCS)

Currently the PCS comprises six categories of higher education with five of these including the title University, which is protected by the *Corporations Regulations 2001*.

Consequently, out of the 172 registered providers of higher education:

- 129 of these are not entitled or allowed to use the title University
- 40 of the 43 that can use the title fit within the category of Australian University
- The remaining three occupy two of the remaining four categories

So in essence other than two overseas Universities and one University of Specialisation (divinity) the current PCS basically comprises two categories, namely HEP and University.

To JMC, to continue with the PCS as currently defined is not consistent with meeting the sentiments expressed in the above highlighted statement from the PCS discussion paper. The fact that the only University of Specialisation registered under the current PCS is focussed on divinity also does nothing to enhance or address such views. A set of categories of which four are basically not used or inaccessible is not really fit for purpose within the current definitions and needs to be addressed during this review.

In short, the JMC Academy does not believe that the continued use, with the definitions of the current PCS will meet the merging needs of the higher education sector and more so may disadvantage Australia in relation to higher education provision for emerging and innovative sectors such as the creative industries.

5. Requirement to use the title University

In England³ the criteria that needs to be met for a further education provider to be able to use the title University is stated as:

Section 2: Criteria for University title and University college title

An organisation wishing to apply for approval to use the title 'University' or 'University College':

- *must have been granted powers to award taught degrees;*
- *must be able to demonstrate that it has regard to the principles of good governance as are relevant to its sector; and*
- *(for University title only) must normally have at least 1,000 full time equivalent higher education students, of whom at least 750 are registered on degree courses (including foundation degree programmes); and the number of full time equivalent higher education students must exceed 55 per cent of the total number of full time equivalent students.*

It should be noted that even though the criteria and process for applying for a University title in England is deemed stringent and rigorous, designed to protect the interests of students and the integrity of the sector there is no requirement for the organisation seeking the University title to be engaged in research.

In Australia however, all of the PCS categories which include the title University require the higher education provider to demonstrate a research capacity to varying degrees. This approach clearly sends the signal, possibly inadvertently, that research is the highest priority, with quality teaching and student service being secondary.

³ https://assets.publishing.service.gov.uk/government/uploads/system/uploads/attachment_data/file/459763/BIS-15-523-university-title-and-university-college-title.pdf

This issue of the teaching-research nexus is well addressed in the PCS discussion paper with quotes from the Bradley review namely

“Institutions with a strong culture of research are better placed to ensure that students receive maximum benefit from research-informed teaching which assists them to acquire a sophisticated understanding of their subjects and to recognise the importance of continuing to update their knowledge and skills”.

and the Productivity Commission review which found

“little empirical evidence that a positive teaching-research nexus exists (particularly at the undergraduate level)” and “no compelling policy rationale for requiring high-quality providers to conduct research in order to be able to label themselves as a ‘University’”.

The JMC Academy maintains that the evidential basis that informs the view of the Productivity Commission should be given more weight than an outdated assertion expressed on the use the title University in the Bradley review.

6. Aspirational Framework for Providers within the PCS Category of Higher Education Provider

The PCS discussion paper states that

Access and participation in higher education has rapidly expanded through developments in technology, innovative approaches to delivery, and globally mobile and connected students, academics and researchers. Student cohorts are more diverse with different learning backgrounds and needs, motivations and aspirations for learning, and expectations of higher education providers. New types of higher education providers and institutional partnerships have also emerged, such as those primarily offering pathways to second or later year entry to University, dual sector institutions, and providers with a significant focus on online delivery. Indeed, Australia’s higher education sector is reflective of the complex world around it – a world increasingly looking to it for solutions.

The JMC Academy is of the opinion that the PCS should not only recognise but to also provide a framework for quality teaching and student focused HEPs to progress to University status.

Currently the first step for an HEP on the path to University status is to gain Self Accrediting Authority (SAA). However, this is the only step if the HEP wants to focus on teaching and student services and to not undertake research.

Of the 12 providers who currently have SAA, 7 are based on a religious foundation, 2 are located in the creative industries all with substantial records of teaching achievement for their industry but not necessarily noted for their orientation to research.

The PCS discussion paper raises the possibility of a minimalistic interpretation of the research requirements in order to satisfy the criteria for being a University; the discussion paper qualifies this approach with the concept of community expectations. To JMC, should this minimalistic interpretation be adopted, without a quality marker for either teaching or for research, some providers could be condemned to a second-class status.

So in keeping the current definitions and trying to minimise the actual expectations of research does not, to JMC, augur well for maintaining the international reputation of Australian higher education. Nor does it provide a framework for quality higher education providers focussed on teaching to gain recognition for their endeavours or to give incentive for further investment of time, energy or resources.

7. University of Teaching

The main tenet of this submission is that the title of University of Teaching should be available to quality teaching and student focused higher education providers who are operating in industry and community areas where research for new knowledge has a lesser priority than developing the skills of individuals, for example in the creative industries.

This, in the opinion of JMC, could be achieved by simply replacing the underutilised category of University of Specialisation with University of Teaching. Within the existing PCS, the criteria governing the provider category of University of Teaching could be defined as:

A higher education provider that offers an Australian higher education qualification where

1. The higher education provider teaches and self-accredits at least 5 undergraduate degree courses of study that meet the Higher Education Standards Framework
2. The higher education provider has been authorised to self-accredit for a period of at least one registration period
3. The higher education provider demonstrates sustained scholarship and academic leadership in teaching and learning in all fields in which courses of study are offered
4. 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
5. The higher education provider demonstrates engagement with its local and regional industry and/or communities
6. The higher education provider has graduate employment rate of more than 60% at 6 months post graduation
7. The higher education provider demonstrates that it has regard to the principles of good governance as relevant to the Higher Education Sector that includes systematic, mature internal processes for quality assurance, the management of risk and the maintenance of academic standards and academic integrity
8. The higher education provider has at least 1,000 full time equivalent higher education students
9. The higher education provider's application for registration as a University of Teaching specialisation has the support of the relevant Commonwealth, State or Territory government

However a simpler set of criteria for a University of Teaching could be

1. The higher education provider has been authorised to self-accredit its higher education degrees for a period of at least one registration period
2. The higher education provider demonstrates that it has regard to the principles of good governance
3. The higher education provider has at least 1,000 full time equivalent higher education students
4. The higher education provider's application for registration as a University of Teaching has the support of the relevant Commonwealth, State or Territory government

in this regard the focus would be on the higher education provider previously gaining SAA for its higher education courses which would include a range of other criteria including

1. The higher education provider demonstrates sustained scholarship and academic leadership in teaching and learning in all fields in which courses of study are offered
2. 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

3. The higher education provider demonstrates engagement with its local and regional industry and/or communities
4. The higher education provider demonstrates systematic, mature internal processes for quality assurance, the management of risk and the maintenance of academic standards and academic integrity

The determination of the full set of requirements for SAA should also be cognisant of the PCS discussion paper which states, as shown above,

Access and participation in higher education has rapidly expanded through developments in technology, innovative approaches to delivery, and globally mobile and connected students, academics and researchers. Student cohorts are more diverse with different learning backgrounds and needs, motivations and aspirations for learning, and expectations of higher education providers. New types of higher education providers and institutional partnerships have also emerged, such as those primarily offering pathways to second or later year entry to University, dual sector institutions, and providers with a significant focus on online delivery. Indeed, Australia's higher education sector is reflective of the complex world around it – a world increasingly looking to it for solutions.

and as such the requirements for SAA should not be defined and implemented in a way that sees the number of higher education providers within the category of University of Teaching clearly restricted and underutilised as is the current situation.