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**Review of the
Higher Education
Provider Category
Standards**

ENQUIRIES

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INTRODUCTION

La Trobe University is pleased to respond to the Review of the Higher Education Provider Category Standards.

La Trobe is a multi-campus university covering central and north-eastern Victoria with campuses at Albury Wodonga, Bendigo, Mildura and Shepparton – as well as our main campus in Bundoora, Melbourne, and a new campus in Sydney. La Trobe serves close to 9000 students from rural and regional areas; one in five La Trobe students come from a low SES background, and many are members of multiple equity groups.

La Trobe was founded half a century ago to broaden participation in higher education in Melbourne's north and, later, in regional Victoria. We have succeeded for many thousands of students who would otherwise have been excluded from the opportunities provided by a university education. Over the years that La Trobe has been in operation the Australian population has more than doubled, yet the number of Australians enrolled at university has increased by a factor of 8.6. Alongside this remarkable rise in participation, the higher education landscape has changed dramatically, seeing an increase from 14 universities to 40, as well as two overseas universities, and the introduction of 127 non-university providers of higher education.

The Review of the Higher Education Provider Category Standards provides an opportunity to reconsider the composition of the higher education provider landscape in Australia. It may be that new categories of provider are needed to accommodate a move toward greater sectoral diversity. Where this is in the interests of students, the future of Australian research and the social and cultural needs of Australians more broadly, La Trobe is in favour. However, we note the problems that have beset the VET sector in recent years and the extent to which these problems stemmed from failure to regulate the activities of private providers who did not have a mission to act in the best interests of students or the nation.

We advocate a restrained approach to any changes to provider categories, and in particular that the title of 'University' be retained in its present form, denoting institutions with a strong scholarly mission across both teaching and research. Greater differentiation of provider types in the NUHEP space could be positive, were changes based on the needs of students for clear descriptions of institution type and mission.

RESPONSE TO THE CONSULTATION QUESTIONS

What characteristics should define a 'higher education provider' and a 'university' in the PCS, and, are the PCS fit for purpose in terms of current and emerging needs?

Categorisation of 'University'

Universities, and national university sectors, exist in an *international landscape* of scholarly teaching and inquiry. While there are some differences in the composition of higher education provider types across nations, the name 'University' is generally understood to indicate an institution offering three or four year undergraduate degrees, and postgraduate degrees including the doctorate, across broad range of disciplines delivered in a context of active research and critical inquiry.

This common understanding of a university holds true even in nations where there is a great deal of diversity in higher education provider types and their regulation, such as the United States. There, for example, many students study undergraduate degrees at institutions that are largely teaching-only and do not offer postgraduate degrees. It is extremely rare, however, for these 'four year colleges' to have 'university' in their title. Similarly, while the German higher education system includes many universities (which tend to have a very strong basic research mission), it also features the non-university

Fachhochschulen, that award undergraduate and sometimes masters degrees in applied and technical disciplines – but not doctorates.¹

International convergence on the categorisation of ‘universities’ as including a strong research component is no small matter. Writing on the importance of the research mission to the definition of a university, Simon Marginson observes, “There will be no return to purely national or local models of the university. Universities that turn their back on globalisation will wither.”²

We note the Productivity Commission’s assertion (‘Observation 3.1’) that, “There is no compelling policy rationale for requiring high-quality providers to conduct research in order to be able to label themselves as a ‘university’.”³ On the contrary, there is a highly compelling reason to retain the common definition of ‘university’, clearly articulated in the report of the Bradley Review and quoted in the present Review paper: “It would not be in Australia’s best interests to ignore the weight of international opinion and practice on this issue”.⁴

In short, although higher education sectors across nations may include many types of provider not present in the Australian system, the title of ‘university’ is rarely given to institutions that are not very similar to those that fit this category in Australia. We recommend that, as the currency of Australian awards is international:

It would be unwise to confer the title of ‘university’ outside of its internationally understood meaning of an institution offering undergraduate and postgraduate education and sustained research.

Differentiation within the NUHEP category

We note above the important role played by teaching-only higher education institutions in other countries, particularly the US. Australia already has a large (in terms of number of institutions) teaching-only higher education sector, as represented by the majority of NUHEPs. The NUHEP category provides an opportunity to expand the range of provider types in ways that may make institutional role and mission clearer for students, and encourage the adoption of new types of provision that may benefit students.

As participation in post-secondary education has increased across nations to become a norm for young people, teaching-only institutions have become dominant in terms of number, as Marginson also notes (*ibid.* p. 17). This may include institutions like the German *Fachhochschulen*, US-style two- and four-year colleges, or Further Education Colleges in the UK. This variation in institutional types at the higher education level more generally offers a number of possibilities for consideration in Australia for institutions falling outside of the university part of higher education. US style two year community colleges, offering associate degrees and with a mission to enhance access and equity could fit well into the Australian higher education architecture. Similarly, US-style four-year degree granting institutions (liberal arts colleges) that focus on small-group teaching and often have only a modest research mission, might serve the needs of many Australian students. Both kinds of institution are often publicly funded in the US system (particularly community colleges), and it may be that this could work in Australia, should there be a government appetite for expanding investment in higher education.

What is needed in Australia is clearer differentiation of the forms of non-university higher education provider beyond the present University/NUHEP binary. Students should be able to make decisions about the kind of institution that is right for them and suits their needs. At present, the NUHEP market is not clearly differentiated. However, La Trobe asks the Review panel to consider carefully if calls to decouple the research mission from institutions called ‘universities’ may be motivated by a desire to bestow on

¹ Commissioned review by Hanover Research group.

² Marginson S. (2014). Teaching and Research in the Contemporary University. In: Tong V. (eds) Geoscience Research and Education. Innovations in Science Education and Technology, vol 20. Springer, Dordrecht, p. 16.

³ Productivity Commission. (2017). Shifting the Dial: 5 Year Productivity Review, Report No. 84. Canberra, p. 108.

⁴ Bradley, D. (2008). Review of Australian Higher Education. p.124.

such institutions the reputation for quality presently held by universities. If so, the answer is to build the quality of NUHEPs rather than to rely on redefining a name. Australia should encourage and support teaching-only institutions to build reputations for quality and excellence serving the public good. Institutions that build strong reputations will not need the designation of 'university' as a market signal – as the US college system shows.

We recommend that:

Differentiation within the NUHEP category should be guided by the needs of students and support excellence in the provision of higher education.

Should some categories be eliminated or new categories be introduced? What should be the features of any new categories? Do specific categories need to be revised?

The Provider Category Standards play an important role in protecting the reputation for quality held by the Australian higher education sector. It may be that expanding the typology of higher education providers beyond the core university/NUHEP dichotomy, perhaps in ways outlined above, would provide further safeguards by more clearly defining institutional missions. However, at present there does not seem to be strong demand from new or emerging provider types – although these may become apparent through this review process.

It is critical that the Australian higher education sector be protected from the kind of scandal that has beset the VET sector. Were any new types of provider to be considered, great care would need to be taken to ensure that student needs are kept at the centre of consideration. There is evidence that disadvantaged people, including remote and Indigenous people and people with mental impairments were targeted by unscrupulous providers at the peak of the VET crisis. This must not be repeated in the higher education sector. These considerations inform our responses in this section.

The Review Paper notes that the some categories of provider are not used. It seems wise to abandon these categories.

The Paper also notes that there has been little call upon the progression categories. In the absence of evidence from intending providers who have not been able to make use of these categories, it is difficult to recommend ways forward. As an established provider La Trobe does not have a strong view here.

The criteria for unlimited self-accreditation are perhaps the most important matter discussed in the paper. The present criteria for unlimited self accreditation have served Australia well and are central to the reputation for quality of Australian university qualifications. Further, the criteria for limited self-accreditation do not seem problematic, and the Review Paper notes only that TEQSA must consider a provider's capacity for limited self-accreditation, rather than simply assessing past capability. This seems reasonable. Waiting for evidence of past poor practice is not in the best interests of students. Again, the VET scandals offer a salutary lesson here, demonstrating the dangers of too loosely regulating the providers of qualifications. We recommend:

No change to the provisions for limited and unlimited self-accreditation.

Finally, the Review Paper questions the present definition of research activity required for 'university' status, and the nature of 'sustained scholarship.' It is true that more precise definitions may be available, for example linking research activity to ratings under the ERA. We have considered this in detail and have come to the conclusion that the potential costs outweigh probable benefits. For example, the introduction of hard research performance targets in the UK brought about aggressive behaviours from institutions in terms of staffing and managing research outputs, that were not in the best interests of research or institutional quality. Research activities are fluid and outcomes have long lead times with

factors beyond institutional control. In the absence of any real threat that universities might begin treating research activity as merely undertaking one project in each of three fields, or enrolling only a single postgraduate research student, as suggested in the Paper, there is no need to rework this requirement. Should small and/or profit-driven organisations be allowed to use the 'university' title, this may be different – yet another reason to continue with the present definition of 'university' and the quality assurance that goes with it. Therefore, we recommend:

No changes to the present definitions of research activity or sustained scholarship.

How the needs of providers, students, industry, the regulator and broader public interest would be served by La Trobe's recommendations

The recommendations we make here have students at their centre. By making the needs of students the guiding principle in development of higher education policy and practice, benefits also flow to providers, industry, regulators and the public interest. Maintaining the present definition of university ensures that Australian universities maintain their place in the global scholarly enterprise. However, recognising the capacity of non-university providers of higher education to deliver excellent education by allowing for greater differentiation within the NUHEP space will help students to navigate a wide range of study options and provide clearer signals about institutional mission. Greater differentiation of NUHEPs within the provider architecture may also assist in ensuring quality in the higher education landscape by making clearer the roles and missions of various provider types. In particular, students must be protected from the kinds of malpractice that beset the VET sector when it moved to a rapidly expanding and barely regulated environment.

We recommend a 'soft touch', restrained approach to any reconsideration of the provider category architecture. Unintended outcomes that could harm the reputation of Australian higher education are to be avoided. We recommend:

That, should any major change be proposed by the Review panel, a further consultation take place allowing feedback on the changes proposed.

LIST OF RECOMMENDATIONS

1. It would be unwise to confer the title of 'university' outside of its internationally understood meaning of an institution offering undergraduate and postgraduate education and sustained research.
2. Differentiation within the NUHEP category should be guided by the needs of students and support excellence in the provision of higher education.
3. No change to the provisions for limited and unlimited self-accreditation.
4. No changes to the present definitions of research activity or sustained scholarship.
5. That, should any major change be proposed by the Review panel, a further consultation take place allowing feedback on the changes proposed.