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Emeritus Professor Peter Coaldrake AO
Provider Category Standards Review Secretariat
Department of Education

Email: PCSReview@education.gov.au

Dear Professor Coaldrake

Review of the Higher Education Provider Category Standards

Thank you for the opportunity to respond to the *Discussion Paper* on the Review of Higher Education Provider Category Standards. Comments are attached and I look forward to meeting with you on 22 March as part of your consultations.

Sincerely

A handwritten signature in black ink that reads "S Bruce Dowton".

S Bruce Dowton

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Review of the Higher Education Provider Category Standards (PCS)

Characteristics of a 'Higher Education Provider' and a 'University'

To achieve the objectives of the *TEQSA Act*, particularly in relation to upholding the quality and protecting the reputation of the higher education sector, it is critical that the PCS contain more consistent threshold standards for all institutions seeking registration as Higher Education Providers. For example, the following standards, which directly support the object of the *TEQSA Act*, should apply to all HEPs and not just those within the *University* sub-categories:

- student support and resources for learning support;
- systematic advancement and dissemination of knowledge; and
- good practice in student teaching and learning.¹

Currently the Standards define undertaking research, which leads to the creation of new knowledge and original creative endeavour, as a point of demarcation between those institutions considered HEPs and those which have *University* status. The statutory distinction is significant and should be maintained. The PCS defines a *University* as possessing attributes associated with established education institutions where scholarship, teaching and research are the primary concerns. These characteristics, include the nexus between research and teaching, are in keeping with international perceptions that the title of *university* is granted by a regulatory authority and signifies a greater level of autonomy than other post-secondary education providers. To revise the characteristics required for registration as a *University* would not only dilute the perceived quality of Australian universities and those overseas universities registered to operate in Australia, but would confuse students, prospective students and employers.

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

In 2013-2014, the Higher Education Standards Review Panel undertook a detailed review of the initial *Higher Education Standards (2011): Standards for Providers*, which included lengthy consultation with stakeholders and TEQSA. However, the *Criteria for Higher Education Providers* have not been subject to a comprehensive review and pre-date the current regulatory environment.

A review of the PCS is required to ensure alignment with the broader higher education regulatory environment. To improve the fitness for purpose of the PCS, the characteristics of a HEP should directly link to the national framework for the regulation of Australian qualifications, the AQF. This would deliver improved coherency between regulatory requirements on all HEPs and regulation of the awards that they deliver. Specifically, requirements for registration as a HEP should be directly related to how the HEP will guarantee that appropriate AQF qualification level descriptors will be met for awards to be delivered. This alignment would form a nexus between the PCS and AQF, particularly in relation to attainment of learning outcomes and graduate capabilities and in doing so, would improve the quality of the education product being delivered, ensure better skilled graduates, protect the reputation of the higher education sector, and protect the interests of students.

¹ *Higher Education Standards Framework 2011*, (Cth), Pt B, B1.

Do specific categories need to be revised? How?

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

Higher Education Provider

There is need for a greater level of granularity in the classification of providers within the HEP category and registration requirements should reflect the revised classification. At present, the *National Register*² only distinguishes the 129 HEPS listed by whether they have University status or are self-accrediting non-University providers. The current approach does not distinguish between those providers who offer very specialised courses, or a limited number of courses, to a relatively small number of students, and those with expansive course offerings across multiple campuses and multiple AQF levels.

A more adequately articulated and segmented categorisation of HE provider-type, based, for example, on size, breadth of delivery, specialisation by area or discipline, and number of campuses would better represent the diversity within the sector. The *National Register* does not include the level of detail required to support informed decision-making by domestic students, let alone international students who are often making decisions while challenged by distance and time. The reflection of a more detailed segmentation within the HEP category on the *National Register* would provide greater transparency and clarity to students, prospective students and employers. It would also link more completely with other Commonwealth sources of information on providers and courses, such as the Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS).

University Category

The PCS for all *University* categories are fit for purpose in terms of providing a consistent set of requirements for Australian, Overseas and Specialist Universities, which align with national and international perceptions.

Australian University College

While there are currently no institutions registered as Australian University Colleges, this is a potentially important category for institutions with aspirational goals and would provide a pathway from Higher Education Provider to self-accrediting authority and registration as a University. For this reason, it should be retained.

² The National Register of Higher Education Providers and Courses, TEQSA, accessed 8 March 2019: <https://www.teqsa.gov.au/national-register>