

# MELBOURNE POLYTECHNIC'S RESPONSE TO REVIEW OF HIGHER EDUCATION PROVIDER CATEGORY STANDARDS

Thank you for the opportunity to respond to the Australian Government's review of the Higher Education Provider Category Standards (released December 2018). Melbourne Polytechnic's response will be framed around the discussion questions raised in the review document.

## ITEM 1: CHARACTERISTICS THAT DEFINE A HE PROVIDER AND A UNIVERSITY IN THE PCS.

The Australian Higher Education sector needs a Provider Category, and related characteristics, that support a more flexible, industry aligned and responsive higher education provider. TAFE's, as publicly funded educational institutions that are highly regulated and deeply aligned and responsive to industry, need recognition of the unique contribution they make to higher education offerings in the Australian market. Creating a new category with underpinning characteristics that support industry led development of courses, that is not research-intensive, that understands that quality learning and teaching can draw from the knowledge production and research of others, that develops higher education programs that are deeply aligned with industry needs, and engage in scholarship and information production that is inherently linked to industry problem-solving and innovation, would change the PCS in ways that were more responsive to current and emerging needs.

The current definitions of, and criteria for, the Provider Category Standards (PCS) are underpinned by the traditional historical view of a University being a place where theoretical knowledge is highly valued, that a core purpose of a University is to contribute to knowledge production and advance theory and knowledge, and this is needed for the good of a civil society.

These ideas about knowledge and the active pursuit of knowledge underpin the Review's commentary on the 'teaching-research nexus' (p. 12) and further underpin the notion that the more research engaged in by a university or higher education provider, the more robust their learning and teaching activity and programs will be. But as the Review itself notes, there is little current evidence to prove that 'a positive teaching-research nexus exists' (p. 13) in University's that are actively engaged in both research and teaching.

There continues to be a need and place for University's to hold knowledge and the advancement of knowledge, as core to their work. However, it is also becoming increasingly important in a diverse and complex global world, that characteristics of Higher Education Providers must extend further than this historical view of research (and a certain form of research) as being a core driver for knowledge dissemination and advancement in learning and teaching in higher education.

New criteria and characteristics for a more diverse and current higher education provider category could include:

- Courses embed scholarship and research learning and innovations drawn from their fields, and learning and teaching scholarship more generally, as a matter of course in their program delivery
- Academic staff engage in a scholarship of learning and teaching practice that ensures quality HE learning and teaching
- Industry led and based problem solving activities (potentially applied research but a more flexible output criteria) shared and worked on with industry partners as core research
- Student and industry satisfaction measures for courses and the organization
  - Current and graduate outcome based surveys
- Scholarship output and scholarship participation including industry engagement, forums and publications being valued

- Success in higher education of disadvantaged and marginalised cohorts, career-changers and industry based students
- Industry engagement in course delivery and recognition of higher education courses meeting an industry need and delivering graduates to this need
- Aligned with relevant threshold standards.

## ITEM 2: PCS FIT FOR PURPOSE FOR CURRENT AND EMERGING NEEDS OF STUDENTS, INDUSTRY AND COMMUNITIES

The current PCS are not fit for purpose.

### **Not meeting student need: Students disadvantaged in the higher education market**

Currently, despite a few exceptions, domestic students who actively choose to study at a TAFE provider that are registered with TEQSA as a Higher Education Provider are denied access to Commonwealth Supported Places. This is despite these TAFE HEP's meeting the same regulatory requirements including meeting the same standards for registration and course development and delivery as other providers with access to CSPs.

Many students that enroll in higher education program at TAFE's are mature age, from disadvantaged cohorts, are career changers and/or are deeply connected to their industry specialisation. These students are economically disadvantaged by the current PCS and related legislation that does not allow them access to CSP's despite legislation that provides a more 'open' higher education market. This policy position significantly compounds disadvantage for many of TAFE students who carry more significant debt than their University student colleagues as well as actively limits any real choice students have to choose between provider types.

### **Not meeting broader education needs: TAFE HEPs disadvantaged in the higher education market**

TAFE's, as educational organisations that are founded on a responsiveness to industry and with strong links to industry across all aspects of educational delivery, are uniquely placed to develop and offer higher education programs that are embedded in industry and respond to industry skill shortage needs. TAFE's key focus is to contribute to economic reform and growth and enhance the foundation skills and/or employment outcomes of its graduates. In moving into higher education provision, TAFEs have been able to more strongly support learning and study pathways and deliver to industry highly skilled and competent higher education graduates in vocational occupations. This is of benefit to the economic growth of our communities and industries however the need for a provider of this type is not acknowledged or valued in the current PCS and their criteria.

TAFE's are disadvantaged in their delivery and growth of HE provision due to:

- Hurdles in receiving course registration and moving towards course and organisation self-accrediting status
  - This means that course development is slower and we are less responsive to industry need to develop and deliver courses in a timely way that responds quickly to current and emerging need.
- Denial of Commonwealth Supported Places
  - This means that we can only rely on full fee paying students in a market place where domestic students can study elsewhere and get financial advantages not available to them if they choose to study HE at TAFE.

**Not meeting industry current and emerging needs: Industry disadvantaged in the current PCS categorization.**

Industry groups have noted across a number of years that the typical higher education graduate is ill-equipped to work productively in the workplace and do not have the skills and attitudes

needed to be immediately successful in their roles (for a sample of this commentary refer <sup>1 2 3 4</sup>). TAFE's, in their long history of designing and delivering qualifications that respond directly to industry current and emerging needs, and their skill and expertise in delivering highly applied education programs, are uniquely placed to develop and deliver programs that industry need and are asking for. TAFEs are already engaged with industry in the delivery of vocational qualifications and have begun initial higher education delivery based on the same industry aligned underpinnings. By constraining the growth of TAFEs in this delivery and restricting CSP and research funding to non-industry aligned HEPs, industry cannot capitalize on its strong partnerships with TAFEs to grow their own innovation agendas and to support staff to upskill.

## ITEM 3: ADDING A NEW PCS CATEGORY AND OUTLINING ITS FEATURES

We believe that there is a real need to add a new Provider Category that represents the industry applied and aligned nature of TAFE educational delivery. We believe this category could be a Polytechnic category that highlights the value and features of a highly applied, industry aligned and responsive vocational higher education provider that has access to funding for students and funding for applied research designed with industry partners.

This new provider category would recognize the unique position of Australian TAFEs with their public ownership and rigorous governance and corporate requirements.

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<sup>1</sup> Lowden, Hall, Elliot & Lewin, 2011, Employers Perceptions of the Employability Skills of New Graduates. Edge Foundation, London.

<sup>2</sup> Carr. A Third of Employers are unhappy with graduates attitude to work. The Telegraph, 11<sup>th</sup> July 2017 (accessed 5<sup>th</sup> March 2019), <https://www.telegraph.co.uk/education/2017/07/11/third-employers-unhappy-graduates-attitude-work/>

<sup>3</sup> Burke. Generation unprepared: The school and university leavers with 'no skills to work at all'. News.com.au, July 14, 2015 (accessed 5<sup>th</sup> March 2019). <https://www.news.com.au/finance/work/at-work/generation-unprepared-the-school-and-university-leavers-with-no-skills-to-work-at-all/news-story/0e91ba570511643e5e223910aecf9616>

<sup>4</sup> The Australian Industry Group, September 2016, Graduate Employability, accessed on 5<sup>th</sup> march 2019, [http://cdn.aigroup.com.au/Submissions/Education\\_and\\_Training/2016/infographics/Infographic\\_graduates.pdf](http://cdn.aigroup.com.au/Submissions/Education_and_Training/2016/infographics/Infographic_graduates.pdf)

The features of this new category would include:

- Recognition of a strong engagement and alignment with industry as core to its work and development and delivery of programs and its scholarship and applied research work. This would include opening access to government research funding for projects that are connected with solving industry based problems.
- Commitment to integrated and supported educational pathways across vocational and higher education with an expected improvement in employment of graduates into industry sectors related to course offerings.
- Recognition that applied learning and the application of theory and skill in the delivery of higher education programs is a specialization in and of itself and that TAFEs are uniquely placed in delivering education that is founded on applied learning principles.
- Acceptance that quality learning and teaching practices include knowledge dissemination and translation of new and innovative theory as connected to discipline as a matter of course.
- Further includes characteristics outlined at Item 1 above .