

Professor Peter Coaldrake, AO  
via: [PCSReview@education.gov.au](mailto:PCSReview@education.gov.au)

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

Dear Peter,

Monash University welcomes the opportunity to respond to the review of the Provider Category Standards (PCS), and notes the timeliness of this review in line with that of the Australian Qualifications Framework.

Monash considers that the PCS are effective and appropriate and there is no need for major changes to the architecture. The PCS provides the basis for the accreditation of higher education institutions, which has been the means of ensuring the reputation of the Australian higher education sector internationally. We do not see that these categories are in need of revision.

Monash also notes that the Review 'will not seek to reframe the Australian tertiary system and its broader policy and regulation', but anticipates questions raised within the Review may identify issues that are broadly outside the intent and purpose of the Category Standards. Monash cautions the Department from attempting to address those issues through a restructure of the PCS.

Comments aligned to the broad principles of the Review are as follows:

### *University categories*

- Monash does not recommend any changes to the existing categories for University providers, with the exception of the University College category that should be removed for the reasons broadly outlined by the Review Panel.
- Monash recommends that the PCS be structured in a way that removes the ability for 'discretionary' category appointments to be made. In addition, providers should be required to maintain the obligations of their particular category standards, for instance, University College, London, retains its registration as an Overseas University despite having ceased delivering courses in Australia.

### *Higher Education Provider (HEP) category*

- Monash sees value in providing limited variation within the existing HEP category so that the sector continues to promote diversification and is best able to meet the needs of students and industry.
- For instance, the introduction of a polytechnic/community college/institute of technology category would allow for a higher education institution to demonstrate evidence of scholarly depth in its teaching staff, without the requirement to meet the research standards required by a University. This category might be charged to deliver degrees at Associate and Bachelor level, but not at Masters and Doctoral level, and may provide for established vocational education providers to create a clearer and more distinctive presence in the tertiary education sector.

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- While issues of funding would need to be addressed through legislation, Monash notes that the introduction of such a category would benefit the significant number of existing third-party arrangements between TAFEs and some universities.<sup>1</sup>

*Self-accrediting authority (SAA)*

- Monash does not believe that a category for NUHEPs with unlimited self-accrediting be introduced, and notes that while the Threshold Standards makes unlimited SAA available to NUHEPS, that no provider with this status currently exists.
- Instead, Monash strongly supports that TEQSA's current assessment of applications for SAA be determined by the strength, efficacy and demonstrated ability of a provider to meet its corporate and academic governance arrangements.

Monash would be pleased to speak further with the Review Panel if you feel that would valuable.

Yours sincerely,

Professor Margaret Gardner, AO  
President and Vice-Chancellor  
Monash University

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<sup>1</sup> Batchelor Institute of Indigenous Tertiary Education may be a test case for the Review Panel to consider here.