



**Queensland University of Technology**

2 George Street GPO Box 2434  
Brisbane Qld 4001 Australia  
Phone +61 7 3138 8086 Fax +61 7 3138 4061  
Email [vc@qut.edu.au](mailto:vc@qut.edu.au) [www.qut.edu.au](http://www.qut.edu.au)

**Professor Margaret Sheil AO**  
**Vice-Chancellor and President**

8 March 2019

Emeritus Professor Peter Coaldrake AO  
Higher Education Standards Panel  
Department of Education and Training  
GPO Box 9880  
Canberra ACT 2601

Email: [PCSReview@education.gov.au](mailto:PCSReview@education.gov.au)

  
Dear Professor Coaldrake

**Review of the Higher Education Provider Category Standards - Discussion Paper**

Thank you for the opportunity to contribute to the *Review of the Higher Education Provider Category Standards Discussion Paper*. I am pleased to attach a submission outlining QUT's response.

I look forward to discussing this with you further at the consultation on Wednesday 13 March.

Yours sincerely

A handwritten signature in black ink, appearing to read 'Margaret Sheil AO'.

**Professor Margaret Sheil AO**  
**Vice-Chancellor and President**



## Queensland University of Technology

### Response to the Review of the Higher Education Provider Category Standards discussion paper

#### Introduction

QUT welcomes the opportunity to provide our views on considerations and questions raised in the review discussion paper.<sup>1</sup>

The Australian Higher Education Provider Category Standards have served the nation well. They are a pillar of the outstanding quality assurance regime of Australian higher education, which in turn underwrites Australia's spectacular success as an education destination and as a global source of reliable research expertise and capable, work-ready graduates.

The PCS were constructed with care and have been implemented intelligently and with sensitivity to the need to balance regulatory rigour with institutional autonomy and diversity. They are still eminently fit for purpose, and the tolerances built in to the existing framework are adequate to accommodate current and emerging needs. Further, there is no evidence of any significant inadequacy in the PCS, nor of any urgent national need for structural change.

While minor adjustments may be deemed appropriate from time to time to serve genuinely novel emerging needs, tinkering and experimentation must not be indulged, as this will place at risk the reputational and actual capability of the PCS to assure quality across the system.

It is therefore QUT's considered recommendation that the Higher Education Provider Category Standards should not be altered at this time. However consultation should commence on developing more closely defined threshold requirements for teaching activity and for research quantity and quality.

#### Considerations

##### Australia's conceptualisation of a 'university'

##### *International comparison*

The stunning success in absolute terms of Australia's higher education sector is even more remarkable when viewed in light of our relatively young age and modest national population. Australia has the third strongest higher education system in the world, ranking behind only the United States and the United Kingdom in the QS *Higher Education System Strength Rankings 2018*. This domestic performance – along with our high quality research contribution to global knowledge – drives Australia as a globally competitive destination for international students, now attracting the second largest cohort of foreign students, having overtaken the United Kingdom. Education is Australia's third largest export sector, driven significantly by higher education. The linchpin of this performance is our rigorous national quality assurance regime, of which the PCS is one pillar.

---

<sup>1</sup> Coaldrake, P. *Review of the Higher Education Provider Category Standards Discussion Paper*. Canberra: Department of Education and Training, December 2018. <https://docs.education.gov.au/node/51731>

While use of the protected title 'university' is more restricted in Australia than in other jurisdictions, that in itself is no argument for loosening the definition: we should define this title to suit ourselves, in the first instance, and with an eye on effects in our international markets, in the second instance.

In the former case, the title 'university' has a settled meaning in Australia: as the discussion paper points out, "Australia has come to conceptualise universities as places for both teaching and research."<sup>2</sup> The PCS is the technical expression of that conceptualisation. There is no apparent appetite among students, employers or graduates at large to undergo another upheaval of the application of the title along the lines of the significant shifts initiated by the Dawkins reforms of the late 1980s.

In the latter case, there does not seem to be any imperative to ease our focused use of the title 'university' for international marketability. It would appear that Australia's specific application of the title is well understood abroad, and serves as a differentiator from the largely unregulated use of the word in certain other markets. It would not be unreasonable to infer that this factor is a contributor to the perception of quality in the international marketplace that fuels our university sector's success.

Even if our usage is not an active pull factor, opening up the title to teaching-only institutions or to smaller, largely unknown providers would certainly risk undermining a confidence built up over decades in what it means to be an Australian university in terms of scope, depth, quality and reliability. The introduction of such instability would increase the perceived risk coefficient for those considering university study in Australia, to the potential detriment of our entire higher education sector.

### ***Teaching-research nexus and rethinking the research requirement***

As the discussion paper notes

To be a 'university' under the PCS, an institution must undertake research that leads to the creation of new knowledge and original creative endeavour, and demonstrate sustained scholarship that informs teaching and learning. The 'Higher Education Provider' category requires providers to be active in research only when engaged in research student supervision and requires academic staff to be active in scholarship that informs their teaching.<sup>3</sup>

In other words, the PCS requires a university to sustain active scholarship in all areas of coursework teaching and learning, and active research in any area in which research training is taking place.

In effect the latter requirement codifies the widely understood meaning in Australia of a university as a place where higher degree by research (HDR) supervision takes place. The PCS link between active research and the conduct of that research training goes to competence to supervise HDR students.

Arguments about the extent, relevance and even existence of the teaching-research nexus have abounded in Australia and globally for decades, with the Productivity Commission's somewhat instrumentalist contribution<sup>4</sup> being only the most prominent in recent years. Some arguments both in favour and against are ideological, others empirical, with most a blend of both, and it is unlikely the debate will be resolved any time soon. Fortunately, the utility of that debate for the purpose of the present discussion is negligible.

As the PCS discussion paper notes in the passage cited above, the *Higher Education Standards Framework 2015* does not rely upon a putative teaching-research nexus. The PCS require only active and sustained scholarship – not research – to underwrite coursework teaching: and require research specifically to establish competence to supervise research training. It is hoped that even the Productivity

---

<sup>2</sup> PCS Discussion Paper, p.11.

<sup>3</sup> PCS Discussion Paper, p.11.

<sup>4</sup> *Shifting the Dial: 5 Year Productivity Review*. Report no. 84. Canberra: Productivity Commission, August 2017. <https://www.pc.gov.au/inquiries/completed/productivity-review/report>

Commission would endorse the existence and necessity of both a scholarship-teaching nexus and a research-research training nexus. They are all the PCS require.

We therefore come back to the common understanding currently in circulation in Australia of what a university is; to a judgement about whether the PCS captures that understanding; and to the practical question of whether there are any reasons the nation might wish to change that commonly understood meaning by means of a broadening of the PCS.

A distinguishing characteristic of a university in Australia is that it is a place where research takes place alongside learning and teaching; where a dynamic institutional culture fosters both knowledge production and knowledge sharing. This is discovery in its two aspects: the global discovery of research and the individual discovery of student learning. A teaching-research nexus is not a pre-requisite for the existence of such a culture, although there are sound arguments that alignment of these spheres of activity would help it to flourish.

We agree with the PCS discussion paper that the broad understanding in Australia is that a university is a place where teaching is informed by scholarship, where research takes place, and where higher degrees by research are supervised and awarded. This understanding is largely independent of the extent of any teaching-research nexus

The PCS requirements are well aligned with this understanding, by virtue of its connections outlined above, so there is no impetus to change the PCS for that reason.

### **Signalling differentiation**

There is considerable virtue in approaching the effectiveness of the PCS through the lens of the expression of differentiation within Australia's extensive higher education sector. Manifestly, differentiation is signalled most clearly by ensuring that each significant and distinct category has a name that is distinct from and avoids confusion with other categories.

For this reason, we strongly advocate the preservation of the current meaning and application of the title 'university', with the resolution of perceived requirements for differentiation in other categories by means of the use of other titles. In particular, the application of the title 'university' beyond its current meaning by introducing new forms of institutions with that title will only obscure differentiation, rather than signalling it.

The discussion paper considers in various places the desire to create new categories: of particular interest are the proposal to permit teaching-only universities, and to allow research institutes to use the title 'university' (and issue research degrees, a question beyond the purview of the present review). QUT is opposed to both these proposals in respect of their use of the title 'university' but would support the creation of new categories to describe such institutions with greater specificity under different titles should demand to do so be forthcoming.

It is argued the PCS might seek to highlight institutions explicitly oriented towards high quality higher education learning and teaching informed by scholarship, but not engaged in research or issuing research higher degrees. American liberal arts colleges operating on this model rightly enjoy enviable reputations for quality and make a genuine contribution to higher education in that country. In Australia, such an institution would not fit within the broadly held understanding of a university, but that should not prevent the creation of a category – with a different title – if a need for this reform is demonstrated. QUT would have no objection to the creation of a category describing such an institution, with the absolute exception of its use of the title 'university.'

Similarly, but from the other direction as it were, should research institutions be granted the right to issue higher degrees, they should not be entitled to be styled universities if they are not undertaking coursework instruction. This, too, would deviate from the widely held understanding in Australia of what a university *is*. A new category might be countenanced for such an institution, using a descriptive title other than 'university', should the need arise. (Further, and for the sake of completeness, research institutions without students of any kind should not be permitted to use the title 'university'.)

## **Optimising the PCS**

### ***Progression categories***

The discussion paper makes a case for the reform of the Australian University College category, pointing to inconsistencies in requirements that make the transition difficult to achieve. QUT would not be opposed to the careful reform of this category into a progression category, probably with the use of stepped tiers within it to signal achievement of milestones. This category should not feature the word 'university' anywhere in its title, except where the institution has an explicit relationship with an existing university willing to guarantee the former's standards.

### ***'Greenfield universities'***

Any new entrant to Australian higher education would require a massive investment and a long term view in relation to any potential return to establish from scratch a university of a scale and quality comparable to universities currently in operation. Should a new player appear, however, with a serious long-term interest in contributing to Australian higher education at the university level, it is reasonable that the Australian community requires it to show willingness by establishing its higher education provider credentials and working its way through a progression of steps towards full University status. There are simply too many open questions that would be left unresolved in the case of immediate anointment, including questions of academic standards (across teaching and learning as well as research), policy and regulatory capability and financial sustainability. Haste to bestow the title 'university' on an unknown quantity would create unacceptable levels of reputational risk to the entire sector, both internationally and domestically.

### ***Overseas universities***

There is a plethora of reasons an overseas university may not pursue the option to establish an operation in Australia within this category, most of which precede and overwhelm the regulatory considerations. Clearly the current universities within this category have not found the regulatory aspects insuperable.

The discussion paper implicitly asks whether the PCS might be one barrier to 'high quality' and 'reputable' overseas universities setting up in Australia: of far greater interest to the integrity and standing of our sector is the extent to which the PCS constitute a barrier to those of lesser quality or reputation.

The current criteria for overseas universities are well calibrated and should not be changed.

### ***Criteria for self-accreditation***

The authority to self-accredit is a great privilege bestowed on behalf of the Australian community through TEQSA, only in the presence of hard-earned trust. It should not be loosened in any way, including in its limited form.

The discussion paper raises difficulties of regulatory supervision of unlimited self-accreditation arising from the prospective nature of many of the criteria specific to this level. These challenges can be addressed by focussing on the integrity of the processes under examination, and making an empirical assessment of the success of these processes in the past to produce outcomes of the required standards. In any case, this implementation challenge should not bring any influence to bear on the PCS themselves, as it would be folly to dilute their rigour or scope simply to make them easier to apply.

### **Quantity and quality of research**

As the discussion paper notes, under the PCS the research requirement is satisfied by activity within as few as three broad areas of research, although that numerical threshold is comfortably exceeded in nearly every instance nationally.

The PCS also does not stipulate any thresholds for activity, either in quality or quantity. (This lack of a defined threshold of activity is reflected also on the coursework side.) It is safe to say that any institution meeting only the bare minimum requirements in any one of these criteria would not be meeting community expectations. Demonstrably, institutions are encouraged by many other means beyond the PCS to teach and research at a high quality across a range of fields. Nevertheless, the PCS should be reformed to reflect the de facto community expectation of minimum quantum and quality of activity in research (and teaching and learning). Detailed technical consultation specifically on this issue should be conducted before changes to the PCS are drafted.

The scholarship criterion is harder to verify directly from the outside, when separated from research, but it is an ongoing responsibility of academic boards in self-accrediting institutions to satisfy itself about the currency of the knowledge of its teaching staff, as a contributing guarantor of quality of instruction. Evidence of the existence and application of processes to confirm the sustenance of scholarship are the means by which TEQSA may satisfy itself on this point. The conduct of academic research necessarily entails the conduct of scholarship within the meaning of the PCS, so demonstration of research in a field satisfies the scholarship requirement by definition.

### **Discussion questions**

The answers below distil the foregoing responses to the considerations raised in the discussion paper, and should be read in tandem with those responses.

#### **1. What characteristics should define a 'higher education provider' and a 'university' in the PCS?**

In broad terms, the current PCS definitions and characteristics of 'higher education provider' and 'university' should be maintained. Entitlement to use the title 'university' should not be expanded, nor should the criteria be diluted.

The title 'university' should be more closely defined with improved characterisation around what constitutes qualifying research activity, in terms of breadth of field, quantity of activity and quality of output, as well the threshold quantum of teaching activity at undergraduate and postgraduate levels. The stipulation of three broad fields of research seems to be well accepted and should remain. A broad field should be defined at the two-digit level within the Australian and New Zealand Standard Research Classification. Further sector consultation should be undertaken to determine specific threshold criteria for research quantity and quality, and for teaching activity.

As the discussion paper proposes, there may be benefit to introducing new nomenclature to support further differentiation within the broad, variegated cohort of non-university higher education providers. Implementation will be challenging, however, as creating new categories of protected titles will involve significant negotiation with providers already titled or branded with terms earmarked for restriction under a new paradigm (for example, nouns like college, polytechnic, institute, academy and school are already in wide and varied use, and existing usage is most unlikely to map neatly onto any new taxonomy).

#### **2. Are the PCS fit for purpose in terms of current and emerging needs? Why?**

With the above caveat about closer definition of threshold criteria around research and coursework instruction, QUT holds that the PCS are fit for purpose, because no specific evidence of current or emerging needs that the PCS are ill-adapted to address has been adduced.

The discussion paper 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. (p.4)

The higher education sector is well positioned to meet this challenges within its current settings, including with the application of the PCS as currently configured.

There are at present no grounds for overhauling the overall design of the PCS. If there are emerging needs and challenges to the sector, they must first be established clearly and concisely, so that the need for reform can be agreed and the nature of the proposed reform negotiated. Absent the proven existence of actual fundamental impediments, any proposal to alter the PCS is a solution without a problem.

**3. Should some categories be eliminated or new categories be introduced? What should be the features of any new categories?**

Arguably there could be introduced a category to describe a 'liberal arts college' style institution, with a new title to specify the offering, although it is not clear there is a pressing need for it. There is no harm in leaving un- or modestly-utilised categories intact. There may be some utility for non-university higher education providers in aligning under more specific rubrics, but reservation of protected titles will prove challenging.

**4. Do specific categories need to be revised? How?**

The 'Australian University College' category could be reshaped as a progression category, and incorporate the probationary stages of any prospective greenfield universities. Some of the requirement inconsistencies alluded to in the discussion paper could be resolved.

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

The PCS regime works very well right now, as a fundamental pillar of our world-leading higher education system. While the discussion paper has addressed a few technical vulnerabilities around the definition of a university, even these are not problematic in practice because other quality-assurance pillars are bearing the load – institutions' defence of their reputations, the high standards of academic boards at self-accrediting institutions, the rigour of academics and the diligence of professional staff. Our recommendation is to fix those technical matters in specific detailed consultation with the sector, and otherwise leave alone a bulwark of our world-class higher education sector, lest we compromise its effectiveness.