

# Submission on the Review of Higher Education Provider Category Standards

Please find below comments from the Regional Universities Network (RUN) in response to issues raised in the Higher Education Provider Category Standards discussion paper.

## **What characteristics should define a “higher education provider” and a “university” in the PCS?**

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

The Regional Universities Network (RUN) sees no need to change the definitions of “university” and “higher education provider” in the Provider Category Standards (PCS).

The PCS describe a “university” in terms of the teaching and research that it delivers and its self-accrediting status. The definition has served the Australian system well, which is recognised internationally as providing high quality education and research. Further, the term “university” is broadly used and recognised around the world as applying to an institution that conducts both teaching and research.

In Australia, the definition “university” is designed for the purpose of establishing a classification to underpin regulatory activity. The development of regulatory approaches over recent years has been driven by the need to safeguard quality in the provision of higher education in an environment where different types of higher education providers, which are not universities, have emerged.

In reality, universities are more complex than as described in the PCS. They are established by legislation as autonomous bodies with complex responsibilities and accountability requirements. The functions set out in universities’ establishing legislation include teaching, research, the advancement of knowledge, the promotion of scholarship and free inquiry, working with industry to develop and promote new knowledge, exploiting commercial applications of knowledge, and a range of community and cultural services.

Australians generally share an understanding of the term “university” as being much more than a teaching institution that awards degrees. “University” has a particular meaning and value, and the continued integrity and quality of Australian universities has contributed to the good reputation of Australia’s education and training system both domestically and internationally. Moving away from this meaning of “university” to allow higher education providers which deliver teaching only to badge themselves as universities will cause confusion and undermine the reputation of Australian universities in the market.

RUN considers that the Australian University category should be protected. It is fit for purpose and does not require change.

Regional universities have a particular role in their communities, which is served by their teaching and learning, research and innovation, and broader civic functions. They are anchor institutions for their regions, and make a major contribution to regional economic and social development, productivity and cultural and civic life in regional Australia.

Research is crucial to regional universities. It enriches teaching and learning, particularly where teaching staff are also involved in research. Research activities and the advancement of knowledge enrich the intellectual life of a university and contribute to an environment where academic excellence and independent inquiry are encouraged. Much of the world-class research in RUN universities is of particular relevance to regional communities and industries e.g. agriculture, environmental studies etc., and would not otherwise be done by metropolitan universities. Further, the research conducted by regional universities contributes to the international links that makes the institutions the most internationally-connected organisations in their communities.

There is a particular dimension to the “research-teaching” nexus in regional universities. As well as providing research-informed teaching, teaching-research academics and higher degree by research students at regional universities provide undergraduate students, many of whom are first in family to go to university, with exposure to career options and endeavours that they would otherwise not see. It provides inspiration for regional, rural and remote students to pursue higher degrees by research. It is therefore important that “universities” in the regions should deliver both undergraduate and postgraduate research degrees.

The introduction of “teaching-only universities” would, in effect, be a return to the binary system of higher education which Australia rejected decades ago. A two-tier system would fuel the perception of “superior” and “inferior” higher education providers, and run the risk that the regions would be dominated by teaching-only education provision which would be perceived as inferior. Teaching-only institutions alone cannot provide the breadth and depth of contribution to the regions that regional universities make.

The HEP category already allows for diversity in approach to higher education teaching and allows HEPs to undertake research. If HEPs wish to become universities, they should be required to meet the same requirements as existing universities.

**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? How?**

The HEP category contains 147 providers that are not differentiated from each other. As the purpose of the PCS is to underpin the regulatory approach, it is not clear how further dividing the HEP category, for example by separately identifying pathway colleges, would add clarity or be of benefit. Some HEPs may apply for self-accrediting status; this could be an organising principle if one is needed.

The cost associated with establishing a new university is probably more of a barrier to new entrants rather than the lack of provider categories.

New campuses are being established by existing universities, and innovations such as study hubs, serviced by existing universities, are facilitating the delivery of higher education in regional communities.

However, there may be value in reconsidering the requirements set out in the Australian University College category for the establishment of a new university. A more graduated pathway from commencing to operate as a university-like organisation towards achieving sustainable and demonstrated performance at university standard could be considered e.g. a transitional category for institutes – for example, existing HEPs or research institutes - that want to develop into universities.

The overseas universities categories appear to be functioning well, as a number of relevant, well-respected universities have established operations in Australia over the last decade or so.

RUN does not support any further prescription of the minimum amount of research that an Australian University needs to undertake.

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

The PCS are broadly fit for the purpose of underpinning regulatory approaches to higher education. They form part of the regulatory architecture and there is no compelling need to overhaul them.

Change to the research requirement for universities, as set out in the discussion paper, could have far reaching consequences for universities, students, industry and regional communities.

Regional universities, their students and communities would be adversely affected by the introduction of teaching-only universities. Potentially, increased competition for public funding would put more strain on the system. Base funding for universities, which includes some recognition of the research and the civic/regional development role of the institutions, as well as teaching, is important for regional communities, many of which rely on universities as anchor institutions.