

15 March 2019

Emeritus Professor Peter Coaldrake AO
C/o Chair
Higher Education Standards Panel
Department of Education and Training

Via email: PCSRReview@education.gov.au

Dear Professor Coaldrake

Swinburne University of Technology welcomes the opportunity to make a submission to the Australian Government's *Review of the Higher Education Provider Category Standards* discussion paper.

Swinburne commends the Government for reviewing the Provider Category Standards (PCS), as periodic appraisals of the PCS and its effectiveness as a framework for higher education delivery make eminent sense.

Swinburne offers the following feedback to the questions raised in the discussion paper:

What characteristics should define a 'higher education provider' in the PCS?

The current definition of a university under the PCS is an institution that delivers teaching and learning, research, and which enjoys a self-accrediting status. Swinburne University does not see the need to amend this basic definition. While these qualities alone do not capture the depth and breadth of the role public universities have in the higher education landscape in Australia, these criteria are sufficient to distinguish universities from other provider types.

Swinburne submits that any alteration to this definition would essentially water down what is a uniquely Australian notion of a university. Further, public universities are established under State legislation which embeds public good and community service obligations. Broadening the definition in a significant way risks eroding the good standing of public universities and may lead to market confusion with providers that deliver teaching only with no research.

Further, the research undertaken by all public universities in Australia, while varying in scale and volume, all contributes significantly to the quality, international connectedness and relevance of the teaching and learning delivered at these universities.

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

As a dual-sector provider, Swinburne is strongly supportive of a diverse higher education sector in Australia. However, it is not clear that the current PCS are so rigid as to demand homogeneity in the sector, and the current diversity of provider missions is testament to this. Swinburne therefore believes that the current PCS remain fit for purpose and we do not support any significant change at this time.

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However, a more seamless linkage between the vocational education and training (VET) and higher education sectors should be given due consideration in both the Australian Qualifications Framework (AQF) and PCS reviews currently underway. It would be a missed opportunity if these consultations are not conducted in lockstep and do not give due regard to the respective findings of each.

Swinburne does not believe that a third or otherwise hybrid sector is required, but rather greater coherence in policy and funding settings in order to foster greater collaboration between the sectors and open more seamless pathway opportunities to students.

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

Swinburne believes that given no providers are currently registered under the Australian University College and Overseas University of Specialisation that these categories could reasonably be eliminated. In the case of the Australian University College, there is the additional concern that the eligibility criteria for this category when compared with the Australian University category are mismatched if the purpose is to provide a stepping stone to full university status.

While Swinburne accepts that the leap from Higher Education Provider (HEP) to Australian University in the PCS is significant, we believe the limited self-accreditation authority in certain fields of study open to HEPs once a reliable history is demonstrated is sufficient to reduce regulatory burden on those HEPs with proven track records.

4. Do specific categories need to be revised?

Swinburne does not believe there is a need for significant revision of the current PCS categories at this time. As noted by the Regional Universities Network (RUN) in their submission to this consultation, the overseas universities category appears to be operating well, given the good reputations of the international universities that have commenced operations in Australia in recent years.

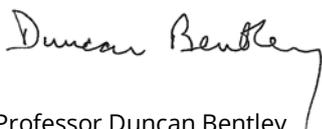
5. How would the needs of providers, students, industry, regulator and broader public interest be served by your suggested changes to the Provider Category Standards?

As stated above, Swinburne's assessment is that the PCS remain fit for purpose and continue to provide a sound underpinning for regulation.

Swinburne does not support any significant changes to the research requirements under the PCS for public universities, nor do we support the establishment of teaching only universities. Changes of these natures could diminish the quality of the student experience and could potentially jeopardise the excellent global standing of Australia's universities.

Thank you again for the opportunity to make a submission to this consultation, and I would be pleased to discuss these matters with you further.

Yours sincerely



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