

PROVIDER CATEGORY STANDARDS

RESPONSE TO DISCUSSION PAPER

The Sydney College of Divinity (SCD) welcomes the opportunity to respond to the Review of the Higher Education Provider Category Standards Discussion Paper. SCD believes that it is a highly significant issue for Australia's profile and influence in the national and international Higher Education scene. It is also a matter of critical importance for SCD itself, as set out briefly below ahead of our responses to the five questions.

The SCD Position

SCD was granted **Self-Accrediting Authority** on 22 June 2016 and is currently preparing to apply for **Australian University of Specialisation (AUS)** status, in conversation with TEQSA, as soon as we believe the application would be viable when measured against the current PCS and TEQSA Guidance Notes. This might be in about 2-3 years.

SCD was incorporated in 1983 when the NSW Higher Education Board directed that theological institutions seeking degree-giving status should rationalize resources and establish a degree-supervision authority administered by the institutions on the model of the Melbourne College of Divinity (MCD). In 2011 MCD became the University of Divinity (UD), the first and so-far only Australian University of Specialisation, so instituted by the Victorian Government on the basis of the National Protocols just as the Higher Education Standards and TEQSA were being introduced.

AUS status has been an essential, documented strategic goal for SCD since 2013. Despite differences in ownership and membership arrangements between SCD and UD – noting especially that approximately 20% of SCD's ETFSL is located in two centrally managed Schools (Graduate Research School and Korean School of Theology) – SCD's constituency and profile are very similar to that of UD in most respects, including the value we both place on the highest levels of academic achievement. As well as extensive informal benchmarking with Australian Universities, SCD has a formal benchmarking agreement with UD, in a group that includes as its third member the Australian College of Theology. We believe it is reasonable for SCD to aspire to AUS status in the reasonably near future.

RESPONSES

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

A HEP delivers undergraduate and/or postgraduate academic awards, which may or may not include research degrees, endorsed by the national Government as on a par with academic awards elsewhere in the developed world. A HEP maintains scholarship that keeps its coursework awards up-to-date and, in some cases, research as a sub-set of scholarship, enabling it to undertake research training. Whether it engages in other research that has no direct connection with its teaching beyond a common concern with the overall discipline(s), is optional.

A university is a sub-set of HEP that necessarily includes amongst the awards it delivers research degrees. It thus maintains research that enables it to undertake research training, but it is also expected to engage in

research for wider social and cultural purposes. In Australia, most universities receive public funding, including for research training and other research activity.

SCD endorses the current expectation that, in matters of learning and teaching and the accompanying requisite scholarship, HEPs and universities should meet the same standards. It is the research factor that distinguishes the two, although some HEPs may engage in some university-level research activity. There should continue to be provision for such HEPs to apply for university status.

The increase in teaching-only universities with demonstrable scholarship but not systemic research — for example, in the UK — poses what is probably the main issue with which this review is grappling. HEPs generally would probably find it a significant marketing tool to be permitted to include the word ‘university’ in their name. For SCD, this would indeed be useful in dealings with international entities for whom this is the norm, for example, Korea. At the same time, however, SCD would see this as a devaluing of the currency that would mean the achievement of short-term practical advantage without deeper, longer-term significance for the benefit of academe more broadly or the reward of greater self-worth.

On balance, SCD leaders value the maintaining of the research definition of ‘university’ over the convenience of a looser definition and find the concept of a ‘teaching-only’ university strange. Accordingly, SCD still values the practice of research-led teaching as a significant part of Higher Education generally as well as a regulatory specification for the university sector. We appreciate that this may not be the common view amongst HEPs, or the view that the Panel will reach. Of course, SCD will continue to fit in with the decisions of the Panel.

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

SCD has concerns in two main areas:

- (i) The account of ‘University College’, for which see 3 (ii) below.
- (ii) Some lack of clarity (a) in the current account of research productivity as it affects AUS status and (b) as it is related to access to public funding of research training and research grants. While (b) lies outside the brief of the Panel, it arguably presents a challenge for the present task of the Panel.
 - (a) SCD will have ongoing conversations with TEQSA that should provide the necessary clarification. At this stage, however, it is not quite clear how the assessment of research productivity in a HEP aspiring to AUS status will reflect the conduct of the ERA exercise in funded universities. There would be appropriate for transparency in this regard in the revised PCS.
 - (b) There is a question about access to the RTS and ARC for any new university or university college, since there is no process for applying for this, and there is, of course, nothing in the PCS about the word ‘university’ providing such access automatically as part of the characterization of a university. We believe it would be both unfair and illogical for SCD, for example, to be given AUS status without equal treatment with UD and other universities in this regard. UD, the only AUS to date, has such access for historical reasons dating back to its HEP days as MCD. At this stage there has been no test case of a new university for TEQSA to address. We draw attention to this matter because it colours the context in which any AUS application would be assessed, namely, the PCS.

The existing inequity whereby the small number of HEPs engaged in serious research that is expected to match research in funded universities seems marked to continue for Government

budgetary reasons. For the situation not to change in the event that a HEP becomes a university would be truly extraordinary.

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

- (i) The fact that there are at present **no Overseas Universities of Specialisation** does not mean that the category should be eliminated. While the **Australian University of Specialisation** concept continues to exist, it seems logical to preserve the matching Overseas category. The fact that the AUS category has already been implemented for even one Australian institution (UD), means, logically, that the AUS category should continue.

If the AUS category were to be eliminated, UD would presumably have to be offered a superior categorization. This would, however, create a highly controversial dimension to the category of Australian university, which conventionally has always referred to a multi-discipline institution, and it would also create an unrealistic divide between UD and at least two other very similar institutions (SCD and ACT). We understand that a fourth institution is also preparing to apply for AUS status in the future (Moore Theological College).

It is no coincidence that all three aspiring institutions, like UD, deliver awards under ASCED narrow code 0917, Philosophy and Religious Studies. As is well known they have always operated, like UD, as para-university institutions established to supply the long-enforced absence of Theology in the Australian university sector, in contrast to its position in universities of British and European heritage.

Moreover, as explained above, SCD has geared its strategy for the last six years to aiming for this goal. To have this potential status eliminated would greatly disturb and distress the SCD community and its stakeholders, who include many community leaders. SCD will always strive for the highest actual standards regardless of possible categorizations, but to remove the AUS possibility would be an unnecessary blow that would seem to add nothing to the Australian Higher education profile.

- (ii) The fact that there are at present **no University Colleges** is more telling. We are aware of at least two institutions that include Theology in a wider raft of disciplines and have been applying for this status, without success to date (Avondale and Alphacrucis), and we believe other institutions are also looking at this possibility. It would seem reasonable to continue to have some such category to aspire to.

If retained, the present category would, however, need fundamental remedial attention and revision: see 4 below.

- (iii) With the very large number of HEPs of differing capacities, including re delivery of research training and faculty research productivity, a question arises around the possibility of distinguishing amongst them.

One simple clarification might be to preface 'HEP' with the epithet 'Self-Accrediting' where relevant, instead of omitting this distinction in the PCS and on the National Register, which is consulted by many for a range of reasons and is strangely silent on this detail. The historical Self-Accrediting HEPs aside, at least five amongst the younger generation with Self-Accrediting Authority (SAA) regards this status as opening the way to possible higher status (AUS or University College). There are presumably other HEPS performing well that may apply for this status before long, and we understand that TEQSA would like to encourage more to reach the point where it would be viable to apply for SAA.

With or without introducing this simple distinction, however, a problem not addressed is that all but one of the younger-generation HEPs to date offer research degrees and engage in serious research to some or other extent, yet their approximation to universities in this respect is not signalled in any way in the PCS. It is still common to hear at TEQSA conferences and in other Higher Education contexts the misunderstanding that HEPs are distinguishable from universities primarily in that they do not do research. This situation is exacerbated for those that do research by the lack of competitive access to public research funding, on which see 2 (ii) (b) above.

SCD does not favour a division of HEPs through the introduction of a new category such as ‘teaching-only university’ that would be inappropriate for SCD because it takes research seriously but allows use of the magic word ‘university’ for institutions that do not take research seriously.

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

The **University College** category is unsatisfactory as it stands and it is hardly surprising that there have not yet been any successful applications. In the past, tradition would have meant that an institution with the expected multi-discipline capacity, a history of delivering Higher Education at a recognized appropriate standard, and a growing capacity for research raining and research productivity might be called a university college for as long as it might take to reach full university capacity, probably under the mentorship of an existing university. In the Australian and UK world, this would have been a publicly funded institution and the availability of public funding would almost certainly have ensured the intended achievement in due course.

It is a different situation with private providers, where the private funding to purchase the extensive skills and other necessities is unlikely to be as readily available regardless of potential. In the end, as well as appropriate inspiration and strategic planning, it is funding that enables the purchase of whatever human and other resources are needed, along with adequate time to get it all into place. It would take most private institutions a long time to acquire the continuing funds for a viable application for University College status with demonstrable certainty of reaching Australian University status within just five years. Again, such an institution would presumably have to arrange for its own mentorship by a university and would find it difficult to gain more than occasional input through, say, committee memberships or specific consultancies.

If the category is to be retained, there would seem to be two theoretically possible ways forward:

- (i) There is simply no way for assessors to be certain that a potential University College will have reached University standard five years on. One solution from this point of view might be to **remove the five-year limit** and let the institution keep trying until it succeeds (or clearly fails). The situation might better be determined at the seven-year registration mark. It would be possible then, if the institution had not reached the desirable standard, to categorize downwards to HEP or to allow a short extension of time (two or three years?) with specific conditions to be met.

There is currently a mismatch of five and seven years in this context. We note, too, the introduction of extensions of the seven years’ registration period that may become available to low-risk providers in general, and which may become wider-spread than at present as TEQSA continues to refine its regulatory priorities. This kind of extension would align with a similar extension that might be available in some cases for a University College needing, say, ten years rather than seven to achieve its goal.

SCD would support a longer period of testing provided that the initial capacities were not lowered and that any institution given University College status would have a promising record with regard to research and otherwise high standards across its whole operation.

- (ii) There has been sector discussion for some years about the desirable meaning of 'university college'. While one approach has been the traditional one, more or less as outlined above, another view has gained some momentum, namely, that the term might be used for a high-achieving institution that does not engage with research in a systemic way - perhaps just enough to allow for Research Essays to be adequately supervised, but not more substantial projects, and with just a minimal number of faculty engaged in research. This might be one approach to instituting teaching-only universities, distinguished from full universities by adding the word 'college'. On the other hand, the public at large is unlikely to discern a difference unless, perhaps, a family member is choosing where to study. On balance, SCD does not favour this approach, as using the word 'university' runs counter to SCD's understanding of research as the essential distinctive for universities.

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

This response takes a minimalist approach that prefers to maintain the existing categories and existing expectations as far as possible, especially with regard to retaining research as the distinctive for any category of 'university'. **SCD does not favour a division of HEPs through the introduction of a new category such as 'teaching-only university' that would be inappropriate for SCD because it takes research seriously but allows use of the magic word 'university' for institutions that do not take research seriously.**

The changes SCD would support are:

- (i) Modification of the University College category by extending the period of testing to seven years, in alignment with registration, and also allowing a short extension of this period in suitable cases, with conditions, in alignment with the new registration extension policy, before either promotion to Australian University status or return to HEP (or Self -Accrediting HEP). This would allow a more realistic timeframe for the necessary achievement. Naturally, it would be expected that the University College at least maintained the standards that initially gained it University College status across the whole period of testing. This would make University College no less challenging to achieve in terms of quality but allow a more realistic process. This in turn would mitigate unconstructive attitudes amongst providers and waste of public money.
- (ii) Clarification of the research requirements for AUS and University College in the revised PCS. This would support greater transparency for TEQSA and providers and obviate a waste of time for both.
- (iii) Creation of a sub-division of HEP status by prefacing 'Higher Education Provider' with 'Self-Accrediting' in relevant cases. This would facilitate transparency for the whole community.
- (iv) Inclusion of the issue of access to the RTS and ARC for relevant Eps not on Table B in the broader considerations of the Panel. This might lead to drawing the attention of the relevant Government

Department to an inequity and illogicality that prevents the best outcomes for the national research product overall.

Diane Speed
Dean and CEO