

8 March 2019

Emeritus Professor Peter Coaldrake AO
Higher Education Provider Category Standards Review
Higher Education Standards Panel
Department of Education and Training

Email: PCSReview@education.gov.au

Dear Emeritus Professor Coaldrake AO

The University of Queensland welcomes the opportunity to make this submission in response to the *Review of Higher Education Provider Category Standards* discussion paper.

The Provider Category Standards (PCS) play an important role in a higher education environment characterised by significant disruption and change, by reinforcing the high quality of tertiary education in Australia and maintaining the excellent reputation of Australian universities.

UQ endorses the Go8 submission and provides the following brief comments. Two issues are particularly critical: firstly, the linkages between the PCS Review, the AQF review, and general funding of universities, and secondly, the importance of quality assurance given the low level of recognition of Australian Universities overseas.

The PCS review provides a timely opportunity to reconsider the purpose of the PCS and its definition of a university.

UQ is in favour of PCS that meet the following principles:

- Promote excellence and a student-centred approach;
- Are robust, transparent, and easily understood;
- Ensure rigorous quality assurance;
- Are not overly bureaucratic in terms of compliance or record-keeping and instead, to the extent possible, use information already available through other government sources;
- Protect the strong reputation of the Australian higher education sector; and
- Encourage and support a more diverse higher education sector, provided this is consistent with preceding principles.

Universities must both educate the next generation and undertake research so the teaching-research nexus does underpin what it means to be a university.

UQ considers that the purpose of having PCS is to define, and protect use of, the term “university”. The definition in Section B1.2 is sufficiently broad in that the standards do not prescribe the disciplinary areas in which universities might choose to specialise, although the standards could include a specific link between the undergraduate and postgraduate coursework which a University teaches and the research it undertakes.

However, it does not follow that all universities should be treated the same. The work of universities is, or can be, very different. UQ therefore supports specialisation, although this may not necessarily include teaching-focussed universities, the introduction of which would have to be considered very carefully.

The standards should recognise that funding and other external circumstances will impact a university and how it chooses to operate. Geographic location is also a key factor.

Since the PCS were established, much has changed in Australian higher education. Access and participation in higher education have been opened up to a greater diversity of student cohorts, pedagogy and delivery of teaching include more technology-enabled devices, and access to information is more widespread.

This last point reinforces the role of universities in supporting students to become critical consumers of knowledge. What has changed significantly, and will continue to change, is the way in which learning is consumed. The focus on delivery is not prohibited by the standards.

The PCS protect reputation and brand. It should not be easy to set up as a university. The barriers to entry should be rigorous, transparent, and easily understood. They should reflect student and community expectations of what a university is and does. The standards also need to align with the Australian Qualifications Framework, to reinforce the value proposition of a university qualification, and with the funding of universities, to support allocation of scarce resources.

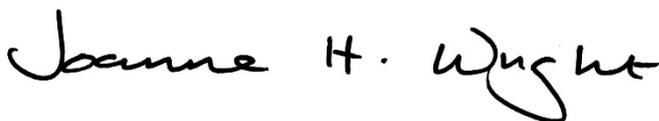
Some consideration must be given to the way universities are funded, to provide greater transparency and also to encourage diversity and specialisation. It would be preferable to change deficiencies in the current model, in which research is not appropriately funded.

Australia has universities to be proud of, and its university sector has strength in diversity. To be recognised as a bona fide university under the PCS, an institution must undertake research leading to new knowledge and original creative endeavour. This is where the different strengths of Australian universities become very pronounced.

However, the funding system is almost blind to this diversity in the sector. Strength in research is of immense benefit for students, who can learn directly from leading researchers and take advantage of their university's national and global standing. However, research funding is inadequate as it does not cover the full cost of projects. The system provides the same funding per-student to research-intensive universities as it does for research-light universities. There is no current mechanism to adjust this funding according to research volume or performance, nor to ensure that the share we assume should go towards quality research indeed does so. As a result, students at a small group of universities that conduct a lot of expensive research are contributing disproportionately to the national investment in research.

I trust these few comments will be useful to your deliberations. If you require any further information or clarification, please contact my office (email dvca.office@uq.edu.au or telephone 07 334 67754).

Yours sincerely



Professor Joanne Wright
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