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Dear Peter

### **Review of the Higher Education Provider Category Standards**

Thank you for the opportunity to provide feedback in response to the discussion paper for the Review of the Higher Education Provider Category Standards.

UTS acknowledges the importance of the Higher Education Standards Framework in supporting the quality of Australian higher education and we are of the view that the current provider categories have served the sector well. However, the category standards could be improved by reducing the number of categories to two – higher education provider and university; simplifying the criteria by removing duplication with the Higher Education Standards; and more clearly articulating the sector leadership requirements of universities.

#### **Retention of teaching and research model**

UTS strongly supports the retention of the current system that provides for teaching and research as core activities of universities and as critical functions for the generation of new knowledge for our nation. We do not support the establishment of teaching only or research only universities.

While some surveys show that students' *perceptions* of the value of a research environment to their degree may be under appreciated, strong evidence points to the overwhelming benefits of the research environment in economic terms through fulltime employment, progress rates, and retention rates.<sup>1</sup>

Australia has an enviable higher education. While the number of universities may be modest relative to other nations, the quality of our system is strong. We have a world leading research capacity characterised by specialised focus across our institutions according to their missions. Any dramatic change to this model – ie, breaking the nexus between research and teaching - would be a highly retrograde step.

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

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<sup>1</sup> [Do excellent research environments produce better teaching and learning outcomes?](#), Barrett. G, Milbourne, R

The key characteristic of a higher education provider is that it delivers teaching and learning in accordance with the Higher Education Standards. The provider may undertake other activities described in the standards but this is the fundamental requirement.

Beyond meeting the Higher Education Standards, the key characteristic of a university is its leadership role in Australian higher education. Leadership must be demonstrated across all activity areas prescribed by the Higher Education Standards Framework including, teaching and learning, research, dissemination of knowledge and higher education practice, engagement with communities and commitment to social responsibility. Leadership must be demonstrated in all these areas so that the development of knowledge and its transmission to the community are fundamental to the ethos of our leading higher education institutions. The breadth of these responsibilities and their delivery provides a national network of quality leadership that engages all parts of Australian society and the economy.

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

The retention of the Provider Category Standards is appropriate as they delineate the threshold and leadership requirements for the provision of higher education. We believe a simple system that directly connects the threshold operational requirements to the Higher Education Standards and places additional responsibilities on universities as sector leaders will provide a clear guide for the sector and other stakeholders.

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

With some adjustments to the criteria, we believe that only two provider categories are required – higher education provider and university. These two categories reflect the threshold entry requirements and leadership requirements for higher education in Australia.

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

The current criteria for the higher education provider category significantly overlap the current higher education standards - the second part of criterion 2 and criteria 3 and 4 are already covered in the higher education standards and do not need to be replicated in the provider category standards. These criteria can be deleted from the provider category standards with the criteria for the higher education provider category being relatively straightforward, specifically:

1. The higher education provider has a clearly articulated higher education purpose;
2. The higher education provider meets the requirements of the Higher Education Standards Framework;
3. The higher education provider offers an Australian higher education qualification and/or an overseas higher education qualification.

In our view, university is the only other required category and its criteria should reflect the broad leadership role universities are required to play in the Australian higher education sector, specifically:

- The university meets the criteria of the higher education provider category;
- The university demonstrates leadership in teaching and learning through sustained scholarship and the development of good practice that has the potential for national dissemination;
- The university conducts research that advances knowledge and contributes to the nation through its impact;
- The university demonstrates engagement with its local and regional communities and demonstrates a commitment to social responsibility in its activities;
- The university has systematic, mature internal processes for quality assurance and the maintenance of academic standards and academic integrity;
- The university's establishment is supported by the relevant Commonwealth, State or Territory government.

The characteristics of the overseas university and overseas university of specialisation categories can be subsumed within the higher education provider or university categories as the criteria for those categories provide the option of delivering an Australian and/or overseas qualification.

The Australian university of specialisation and the Australian university college categories are not required as their primary purpose appears to be identification of operational scale. The higher education provider category is able to cover a wide range of scale and maturity characteristics with the university category distinguished not by scale but by sector leadership.

Prescribing the number of disciplines, as a proxy for scale of operation, is not necessary. It would be acceptable for a university to have a relatively narrow disciplinary focus so long as it can demonstrate the national leadership qualities required of a university.

Self-accrediting requirements can be omitted as these are dealt with in section B2 of the higher education standards framework. Given the leadership characteristics required of a university the expectation is that they would meet the self-accreditation standards but it does not need to be a provider category criterion.

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

Two provider categories will delineate the threshold requirements that all providers must meet and the national leadership responsibilities that come with being designated a university. This structure will be clear, transparent and assessable by TEQSA. It will allow stakeholders to easily understand the difference between quality threshold operations and sector leadership.

As it is now, use of the name university would be restricted to those organisations that meet the leadership criteria. All other higher education providers are able to use names, including college and institute, that communicate their focus to the market.

It is critical for the Australian higher education sector to continue to improve and evolve and to do that requires sector leadership that is specifically recognised. Stakeholders already look to universities for national leadership in higher education and this structure would confirm that role and remove any confusion other categories may currently create.

Further, the criticality of the nexus between research and teaching must be maintained in order to continue to provide the rich generation of knowledge, world leading research and strong employment and economic outcomes for graduates.

Kind regards



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