



## **University of Wollongong (UOW) response to the Review of the Higher Education Provider Category Standards – Discussion Paper**

### **UOW response to discussion questions:**

#### **1. What characteristics should define a ‘higher education provider’ and a ‘university’ in the Provider Category Standards (PCS)?**

UOW supports the current categories and definitions for university providers. In particular, we support the continued differentiation between Australian universities and overseas universities and between universities that offer courses and undertake research across a broad range of fields and ‘Universities of Specialisation’ that offer courses across a narrow range of fields (defined as two or less).

UOW strongly supports the continued conceptualisation of a ‘university’ as a place for both teaching and research and the continued allocation of greater autonomy to institutions so classified (noting that non-universities can apply (and some have been granted) self-accrediting status). The requirement that a university undertake original research in at least three broad fields of study in which higher degrees by research are awarded should also remain in place.

The discussion paper refers to the fact that the Provider Category Standards do not define the quantity or quality of research required *within* each broad field of study to justify ‘university’ status. UOW believes that the issue of quality of research is best addressed by application of the Higher Education Threshold Standards rather than through the PCS. Defining the quantity of research within each field would be overly prescriptive.

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

The University considers that, on the whole, the PCS are fit for purpose. The discussion paper questions whether the PCS need to take account of varying levels of activity and quality of a single provider (for example, where the provider offers courses across different locations). UOW believes that this is more appropriately regulated, again, by the application of the Higher Education Threshold Standards to all delivery locations rather than through the PCS.

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

UOW supports the notion of differentiating more between the 127 non-university high education providers, all of which currently fall under the generic “higher education provider” (HEP) category. This is a large category and there is room for further delineation in a meaningful way in order to give greater clarity as to how the sector is constituted.

We note, for example, that TEQSA in some of its reporting, distinguishes between TAFE higher education providers and for-profit and not-for-profit providers within this category. It is also noted that, unlike in the university category, there is no attempt to distinguish between providers that specialise in one or a small number of fields and those providers that offer courses over multiple fields of education. Nor is there any means of delineating an online-only provider. Such delineations may be helpful from both a students’ and regulator’s perspective.



The discussion paper raises the question of the utility of the two unoccupied categories - Australian University College and Overseas University of Specialisation. UOW supports further examination of the utility of these categories.

The discussion paper also raises the question of whether or not pathway colleges linked to a university and offering AQF level 5-6 courses should be classified as a stand-alone category. UOW believes this question is worth exploring further. UOW College (a pathway college owned and operated by UOW) falls under this category. Such providers could be viewed as lower risk providers within the broader HEP category and a separate category would signal this differentiation to students. Additionally, aligning the re-registration process of pathway colleges with that of their 'home' university would provide the opportunity for greater efficiencies and better alignment of quality assurance processes.

The paper refers to the fact that the PCS contains no provision for 'greenfield' universities to operate on a provisional basis without having to meet all the higher education standards from the outset. The suggestion is that a newly approved 'greenfield' university could operate in compliance with a subset of standards as they scale up to full operation. UOW supports the concept of a 'high front gate' for new entrants to the higher education sector as a way to protect Australia's reputation as a provider of quality higher education. UOW therefore believes this question needs careful consideration. If a 'greenfield' category is to be introduced, careful consideration is needed as to what standards need to be met from the outset and what standards could be achieved over time.

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

Other than as detailed above, no.

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

Further delineation of the HEP category would assist prospective students and other stakeholders understand broad differences between the providers that fall within this category. Any changes to this category should be explored in consultation with the non-university (HEP) providers.

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