

Review of the Higher Education Provider Category Standards

University of the Sunshine Coast
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Thank you for the opportunity to provide comment on the discussion paper 'Review of the Higher Education Provider Category Standards'.

These standards have been somewhat problematic since the introduction of the Higher Education Standards Threshold Standards where they are not standards as such, but rather a set of criteria describing the different categories of approved providers in the higher education sector. This review provides an opportunity to consider whether the categories are appropriate and reflective of the sector in practice and, where this is not the case to consider potential alternatives.

The current characteristics for a higher education provider remain appropriate. It is of utmost importance that both providers and their courses are registered and accredited by a recognised and proven authority. Anything less than this opens the door to possible Greenwich University type situations reoccurring.

It is vital that a university maintain the need to engage with, support and deliver both teaching and research. The requirements of the category would not appear to be onerous and there is diversity within how universities approach the current requirements. Within the constraints of the category some have moved to have more teaching-focused academic staff and also more research-focused staff. The reputation of Australian higher education has been largely formed on the basis that our universities undertake both teaching and research activity.

While the category of Australian University College could perhaps be dispensed with, as there are currently no providers in this category, it is important to recognise that a number of current HEP category providers do aspire to university status. The current name of this particular category is probably confusing to most stakeholders and the general public, and perhaps a name more clearly reflective of the status of the institutions qualifying for this category would be more helpful.

Universities of Specialisation is also a category with limited uptake (only 1). If the requirements for research to be an Australian University are to remain, then this category needs to stay although it is unlikely that there will ever be many providers in it.

The discussion paper also raises the matter of Greenfield universities. Australia is well serviced in the higher education sector. While we may not have as many universities as similar countries there would not appear to be any unmet demand. Many of our universities are much larger than those overseas and we have a substantial private provider component in the sector. Current data shows that students are still overwhelmingly attending universities and rather than new universities being established, existing universities are expanding their operations. Given the costs in establishing a new university from the ground up, it is highly unlikely that we will see any proposals in the next few years.

The overseas universities categories are functioning well. A number of well-respected overseas universities have established operations in Australia over the years. Some have withdrawn after a period of time. Indications are that Australian students are happy with Australian higher education providers. Most overseas universities have established small, limited course operations here. As a market that is well served domestically, overseas providers need to be offering something that our students do not believe they can obtain from one of our high-quality institutions. Australian students

who wish to study with a highly reputable overseas university or other higher education provider, generally travel overseas to do so.

As stated in the discussion paper Australia has an enviable reputation for high quality higher education, that has been fostered and sustained over many years. Any changes to provider categories or the requirements for entry to these categories must be very carefully considered.

The sector has been very successful in responding to the highly evolving environment of the twenty first century and in integrating innovative methods of teaching with new technologies. The ongoing demand for Australian higher education by both domestic and international students is evidence of this success.

The categories for being a higher education provider in Australia, and the criteria for each of these, must continue to maintain the quality of Australian higher education and in doing so give confidence to students and stakeholders, and not create any situation for unintended reputational risk to the sector.

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