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Office of the Deputy Vice-Chancellor and Vice-President (Academic)

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Emeritus Professor Peter Coaldrake AO
Reviewer, Higher Education Provider Category Standards
PCSReview@education.gov.au

Dear Peter,

Western Sydney University welcomes the opportunity to provide input to the review of the Higher Education Provider Category Standards.

As the primary regulator of Australian higher education, TEQSA is guided by the Higher Education Standards Framework which contains the Provider Category Standards. The criteria used for higher education providers in the provider categories pre-date TEQSA. It is important that TEQSA's status as a regulator and its relationship with the HESF is kept in mind when considering the provider categories. The criteria for recognition as a higher education provider in Australia provide assurance that a qualification awarded by an Australian higher education provider is of high quality and meets a minimum standard. It is important to protect the reputation of the Australian Higher Education sector and what it means to be a university.

The regulation of Australian higher education should take into account an institution's capacity and capability to provide quality higher education. Universities and the community need quality, clear information about each provider rather than detail about the category.

We support consideration of the contemporary relevance of the title 'university'. However, there is no defensible argument to support moving away from the current interpretation. The defining characteristic of universities in Australia is the creation of new knowledge through research, and research-informed teaching.

It is noted that some of the provider categories are currently not in use, or seldom used. This suggests there is potential for reducing the number of categories.

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In addition, we believe it is important that this review is not diverted into a consideration of funding of higher education.

Western Sydney University's responses to the discussion paper questions are attached. If you or the Department have any questions concerning this submission, please do not hesitate to contact Mr. Tony Lazzara on (02) 9678 7016 or via email to t.lazzara@westernsydney.edu.au.

Yours sincerely,



Professor Denise Kirkpatrick

Deputy Vice-Chancellor and Vice-President (Academic)



REVIEW OF THE HIGHER EDUCATION PROVIDER CATEGORY STANDARDS

Response to discussion paper released December 2018

Western Sydney University welcomes the opportunity to provide input to the review of the Provider Category Standards.

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

The current criteria for recognition as a higher education provider in Australia are comprehensive and generally fit for purpose. They provide assurance that a qualification awarded by an Australian higher education provider is of high quality and meets a minimum standard. The assurance provided to students in Australia and overseas is of paramount importance and must not be weakened by any changes considered.

The category 'Australian University' is the second largest category of providers in terms of numbers. The current categorisation of universities and higher education providers in Australia is well recognised internationally and this suggests that any changes considered could have significant implications for the standing of Australian higher education.

No case has been made that the characteristics of an Australian university should be changed or relaxed to allow more providers to meet the criteria. There is no evidence to support moving away from the Bradley Review finding that creation of new knowledge through research and research-informed teaching are defining characteristics of universities in Australia. Research is a fundamental element of disciplines which informs best practice and quality teaching. The separation of research from teaching would weaken the ability of universities to deliver curriculum that is informed by research and responds to industry and community needs.

The paper asks whether specialised research institutes should become eligible for university status. Western Sydney University does not consider that research institutes, or research institutes that offer doctoral training, would meet public or international expectations of what a university is in Australia. Again, the research-teaching nexus across a broad range of activities is an inherent feature of a university in Australia. An Australian University is currently required to deliver undergraduate and postgraduate courses across a range of broad fields of study, including research masters and doctoral courses in at least three of the broad fields of study.

The discussion paper asks whether universities should be able to specialise in only undergraduate or postgraduate, with or without research. Western Sydney University would not support the separation of research from teaching across all levels, as noted above, but there may be merit in considering whether specialisation in postgraduate courses might be of benefit. In the current capped environment a change to allow graduate-only universities is attractive. However, care would be needed to ensure research concentration and research funding is not preferentially given to graduate schools thereby reducing the resources and capabilities of the broader sector.

There could be merit in re-considering the definition to provide that an Australian University is a higher education provider established by an Act of Parliament, rather than stipulating the number of fields in which the full range of courses needs to be delivered. It is noted that such a change would not prohibit the foundation of private sector universities. Overseas providers registered under a separate category would not be affected by any change.

Any changes to the Australian University category would need to be matched by consideration of consequential public and private funding implications.

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

The PCS have assured the quality of the higher education sector in Australia. However, there are a number of areas where amendment could be considered to meet changing needs.

It is noted that some of the categories are either not currently in use, or seldom used. This suggests that there is potential for streamlining them. Categories not in use could be deleted.

There seems to be no compelling argument to retain the two categories covering overseas universities.

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

There is potential for streamlining the number of categories. It is noted that some of the categories are not in use, or seldom used, and this creates an opportunity for reduction in the number of categories.

4. Do specific categories need to be revised?

No comments in addition to the above.

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

No comments in addition to the above.

6. Concluding comments?

As noted above, the current categorisation of universities and higher education providers in Australia is well recognised internationally. In particular, an “Australian University” is recognised as providing research and teaching. The separation of research from teaching would be to the detriment to the provision of high quality education.