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Higher Education Standards Panel Executive
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ACPET Response Higher Education Standards Panel - Call for Comment

The Australian Council for Private Education and Training (ACPET) welcomes the opportunity to respond to the Higher Education Standards Panel *Call for Comment (Number 2, 28 May 2013)*.

ACPET is the peak body representing private education and training providers in Australia, with approximately 1,000 members in all States and Territories. ACPET has approximately 100 members delivering higher education throughout Australia. According to the recent Grattan Institute analysis of higher education, in Australia there are approximately 59,000 equivalent full time students currently enrolled in non-university higher education courses.

Non university higher education providers form a very diverse group of specialised institutions. ACPET's higher education members deliver degrees in the fields of theology, business, information technology, natural therapies, hospitality, management, teaching, health, law, design, accounting, multi-media, music and public safety. Approximately half of Australia's non self accrediting institutions are approved under the *Higher Education Support Act 2003* as FEE HELP providers.

ACPET has long advocated for the revision of the Threshold Standards and for streamlining both the style and content of the standards statements in order to avoid unnecessary duplication and complexity, and provide relevant supporting information and guidance to providers in interpreting the standards effectively and appropriately. ACPET advocates that providing simple and clear information is the most effectual means of supporting providers meet and maintain the required standard level, and for regulators in interpreting the required standard level.

In response to the *Call for Comment*, ACPET has consulted widely with its members, and is pleased to offer the following general comments relevant to the three proposed draft Standards.

Q1. Do you broadly support the proposed draft Standards for Research, Research Training, and Learning Outcomes (Research Training)? If not, why not?

ACPET broadly supports the three proposed draft Standards. ACPET welcomes the consistent, succinct way in which the standards are written, and the avoidance of duplication of standards statements for coursework, where formal coursework is associated with research.

ACPET is aware that the Higher Education Standards Panel is aiming for quality and consistency in these three areas across the Australian public and private higher education providers. In the proposed standards, there appears to be, however, an underlying assumption that all institutions are similar. ACPET stresses the importance of acknowledging that diversity is important, and needs

to be supported in particular in relation to niche providers, and that diversity does not necessarily signify non compliance.

ACPET acknowledges the wide range of responsibilities for a provider associated with the conduct of research, including the skills of staff, the academic governance framework, the maintenance of a research repository, and the reporting and analysis of research output. This wide range of responsibilities will inevitably lead to increased business costs to institutions, impacting heavily on small institutions. Getting the balance right with the effectiveness of the standards which aim for achieving and maintaining quality, and not overly burden small niche providers is critical.

ACPET acknowledges that the proposed standards are developed to provide guidance to both providers and regulators. In view of the diversity of higher education providers in Australia ACPET strongly recommends that the standards provided for research should be written in a manner that provides for a fit for purpose interpretation by the regulator.

Additionally, ACPET advocates that an appropriate time needs to be provided to private higher education providers to prepare strategically for the introduction of the new standards.

Q2. Do you wish to make any suggestions in relation to the specific content of the standards?

Across all three proposed standards, there is emphasis on the importance of ‘international comparators’. The proposed draft Standards for Research for example, state:

“6. Research performance is:

[...] b. Analysed by reference to national or international comparators, [...]”

Universities are part of groupings (eg Universities Australia) or systems that facilitate this comparative process, and are generally supported by the government. For example, the Excellence in Research for Australia (ERA) exercise is conducted and funded by a government agency that compares the research outputs of all Australian universities across a broad range of discipline areas. Private providers are not included in this exercise, and receive no funding to undertake these processes. Currently, a parallel system to the ERA is not available for private providers.

National and international comparisons of Australian universities across a range of criteria, including research, are currently undertaken also by agencies such as the *QS World University Rankings*, the *Times Higher Education World University Rankings*. Once again, non university private higher providers are not included in these international comparisons. ACPET stresses the need for the Standards Panel, and later for TEQSA, to understand and appreciate the diversity of Australian providers, and recommends that the standards, which may be easily applicable to the universities, need to be written in a way that recognises that the Australia’s higher education sector comprises of more than just universities and that therefore the standards must be fit for purpose and not university centric.

ACPET welcomes the opportunity to provide this feedback to the Higher Education Standards Panel.

Yours sincerely,

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