

What's in a Name?

Review of the
Higher Education Provider
Category Standards

FINAL REPORT
SEPTEMBER 2019

EMERITUS PROFESSOR PETER COALDRAKE AO

Final Report

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List of Acronyms and Abbreviations

ABS	Australian Bureau of Statistics
ANZSRC	Australia and New Zealand Standard Research Classification
AQF	Australian Qualifications Framework
ASCED	Australian Standard Classification of Education
ASIC	Australian Securities and Investments Commission
ASQA	Australian Skills Quality Authority
Bradley Review	Review of Australian Higher Education 2008
CGS	Commonwealth Grant Scheme
CRICOS	Commonwealth Register of Institutions and Courses for Overseas Students
CSP	Commonwealth Supported Place
ERA	Excellence in Research for Australia
HELP	Higher Education Loan Program
HERDC	Higher Education Research Data Collection
HESA	<i>Higher Education Support Act 2003</i>
HESP	Higher Education Standards Panel
IHEA	Independent Higher Education Australia (formerly Council of Private Higher Education (COPHE))
ITECA	Independent Tertiary Education Council Australia (formerly Australian Council for Private Education and Training (ACPET))
National Protocols	<i>National Protocols for Higher Education Approval Processes</i>
PCS	Higher Education Provider Category Standards
Provider	Higher education provider
QILT	Quality Indicators for Learning and Teaching
SAA	Self-Accrediting Authority
TAFE	Technical and Further Education
TEQSA Act 2011	<i>Tertiary Education Quality and Standards Agency Act 2011</i>
TEQSA	Tertiary Education Quality and Standards Agency
Threshold Standards	<i>Higher Education Standards Framework (Threshold Standards) 2015</i>
VET	Vocational Education and Training

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The Hon Dan Tehan MP
Minister for Education
Parliament House
Canberra, ACT 2600

10 September 2019

Dear Minister

In October 2018, you announced my appointment to undertake the **Review of the Higher Education Provider Category Standards** (PCS) to ensure they are fit for purpose against Australia's changing higher education landscape, comparable to international benchmarks, and accommodating to innovative and changing practice.

I am pleased to present my Final Report to you in your capacity as Minister for Education.

All interested parties were encouraged to participate and share ideas with the Review. Some 67 public submissions were received and extensive consultations were held across Australia with a wide range of higher education stakeholders and experts.

Underlying this Review is a cognisance of the changing nature of the Australian higher education landscape. Institutions will continue to evolve to meet different needs and pathways of students, burgeoning and shifting demand by industry, and new and innovative connections and partnerships among institutions, employers and communities. The PCS do not, and should not, inhibit our institutions from differentiating themselves and their missions in pursuing these opportunities and meeting these challenges.

The recommendations of this Report will enable opportunities to build the cachet of all higher education providers across the sector and support their aspirations and growth. In particular, the recommendations seek to boost the utility and recognition of categories and bolster requirements that support high quality higher education. Above all, the recommendations seek to protect both the interests of students as consumers, and Australia's international reputation for higher education.

I would like to thank the members of the Higher Education Standards Panel for their prudent oversight and support during this Review. I also thank all interested parties who contributed to this important activity, particularly the stakeholders who gave up their time to prepare submissions and participate in consultations.

I thank you for the opportunity to conduct this Review and commend this Final Report for your consideration.

Yours sincerely



Emeritus Professor Peter Coaldrake AO

Executive Summary

The purpose of the Review of the Higher Education Provider Category Standards (PCS) is to ensure that, as a discrete component of the national regulatory framework, the PCS are, and will remain, fit for purpose. This involves assessing the historical and current utility of the PCS to students, providers, employers, the regulator and the government of the day. In other words, the essential purpose of regulating the nomenclature of providers is consumer protection; students and potential students, and the broader community, should be able to understand the roles and expectations of the different categories of educational providers.

The Review recommends the simplification and rebalancing of the current categories of higher education providers. This involves reducing the overall number of higher education provider categories from six to four, by merging and rationalising the university-related categories from five to two, and increasing from one to two the number of categories catering to those higher education providers which are not universities. The latter addresses an issue of under-differentiation of such providers in the current PCS.

While universities will continue to predominate higher education enrolments, much of the jobs and skills growth over the coming years will occur in areas spanning university, broader higher and professional education, and the vocational sector. The recommendations of the Review seek to improve the visibility and utility of the PCS as part of the national regulatory framework, and do so through a lens to the future.

Recommendations

Recommendation 1

There should be a simplification of the current provider categories. Our universities are currently over-categorised, while all other higher education providers are grouped in a single undifferentiated category. The current five university categories should be reduced to two categories and the current single category for other higher education providers (that are not universities) should be increased to two categories.

Current Categories	Proposed Revised Categories
Higher Education Provider Australian University Australian University College Australian University of Specialisation Overseas University Overseas University of Specialisation	Institute of Higher Education National Institute of Higher Education Australian University Overseas University in Australia

Recommendation 2

In line with Recommendation 1, the current 'Higher Education Provider' category should be renamed 'Institute of Higher Education' category to build distinctiveness and to avoid confusion with the broad definition of 'higher education provider' under the *Tertiary Education Quality and Standards Agency Act 2011*.

Recommendation 3

In line with Recommendation 1, a new category titled 'National Institute of Higher Education' should be created to serve aspiration, destination, or progression purposes. This category will be reserved for the highest performing higher education providers which are not universities. National Institutes of Higher Education will be recognised for meeting additional criteria to those required of other higher education providers outside the universities and will have a significant measure of self-accrediting authority status.

Item	Related Action
'National Institute of Higher Education' category	The Australian Government should consider policy arrangements that may support high quality providers that meet the standards of the proposed 'National Institute of Higher Education' category.

Recommendation 4

The Higher Education Provider Category Standards must enable providers to transition to other categories and grow their course and research offerings. This should be complemented by a guidance framework developed by the Tertiary Education Quality and Standards Agency. This will better assist providers in their successful transition to other categories and will both encourage and support excellence, differentiation, and innovation.

Recommendation 5

Along with teaching, the undertaking of research is, and should remain, a defining feature of what it means to be a university in Australia; a threshold benchmark of quality and quantity of research should be included in the Higher Education Provider Category Standards. This threshold benchmark for research quality should be augmented over time.

Recommendation 6

Requirements related to industry engagement, civic leadership, and community engagement should be introduced or bolstered in the university categories of the Higher Education Provider Category Standards. Industry engagement requirements should also be part of the proposed 'National Institute of Higher Education' category.

Recommendation 7

To ensure Australia's higher education sector is positioned to support innovation, population growth, and demand for higher education in the future, the *Tertiary Education Quality and Standards Agency Act 2011* should be amended to allow for 'greenfield' universities.

Recommendation 8

The criteria for seeking self-accrediting authority should be amended to simply and clearly articulate the types of self-accrediting authority (limited and unlimited) that can be authorised by the Tertiary Education Quality and Standards Agency and the requirements to be demonstrated by providers seeking self-accreditation status.

Recommendation 9

The essential purpose of regulating the nomenclature of institutions via the Higher Education Provider Category Standards is consumer protection. There should be, therefore, greater transparency and awareness-raising of the Higher Education Provider Category Standards, including the requirements expected of providers by different category type. This will be for the benefit of potential students, industry, and employers, both domestic and international.

Item	Related Action
The National Register of Higher Education Providers	To enable consumers to be better informed of the requirements expected of providers registered under different categories, the Tertiary Education Quality and Standards Agency should provide more descriptive information on the National Register of Higher Education Providers.
Tertiary Education Quality and Standards Agency Provider ID and provider category	To assist in transparency for consumers, all registered higher education providers should feature their Tertiary Education Quality and Standards Agency Provider ID and provider category on relevant public material.
Communications strategy	To build understanding and recognition of the different categories of higher education providers in Australia, a concerted communications strategy should be actioned with national and international audiences in mind.

Recommendation 10

The recommended changes to Part B of the *Higher Education Standards Framework (Threshold Standards) 2015* (as set out in [Appendix D](#)) should be referred to the Higher Education Standards Panel for deliberation. The HESP will then advise the Minister for Education on further required actions.

Chapter 1

Context and Changing Landscape

1.1 Context

The Higher Education Provider Category Standards (PCS) are a discrete and important part of the *Higher Education Standards Framework (Threshold Standards) 2015*. The Threshold Standards set the high standards required to operate as a higher education provider in Australia. The PCS describe the different categories of higher education providers, and requirements expected of them, for registration by the Tertiary Education Quality and Standards Agency (TEQSA).

A key driver for this Review has been to ensure that the PCS remain fit for purpose against Australia's evolving higher education landscape, accommodate innovative and changing practice, and are comparable to international benchmarks. This is important given that Australia's model for categorising higher education has remained fundamentally unchanged for almost twenty years, and over this period the higher education system has experienced significant change.

In undertaking this Review, the PCS have been examined with a range of stakeholders in mind: higher education providers, the regulator, students as consumers, employers, and the broader public interest.

Some significant considerations have been examined. These include the way in which Australia continues to define its higher education providers and universities, encourages aspiration and excellence, signals and supports differentiation across the sector, and optimises the PCS to best meet the full range of stakeholder needs.

The terms of reference for this Review are set out in [Appendix A](#). The Review process is outlined in [Appendix B](#).

1.1.1 Australia's Higher Education Quality Assurance Framework

Australia's higher education sector has established a reputation as an education leader globally. This enviable position is supported by Australia's higher education quality assurance framework. This framework is comprised of a national regulatory body for higher education (TEQSA) underpinned by strong Threshold Standards. All higher education providers, including universities, must be registered with TEQSA in order to offer higher education courses in Australia.

TEQSA was established in 2011 by the *Tertiary Education Quality and Standards Agency Act 2011 (TEQSA Act 2011)* and became operational in 2012. TEQSA protects the quality of Australia's higher education through its assessment of compliance with the Threshold Standards. While TEQSA reports some operating challenges, such as improving processing times for applications,¹ the agency is generally well regarded within the sector and internationally.

¹ Tertiary Education Quality and Standards Agency (TEQSA). (2018). *TEQSA Annual Report 2017-2018*. pp. 2-3. Retrieved from: <https://www.teqsa.gov.au/sites/default/files/teqsa-annual-report-2017-2018.pdf?v=1539560088>.

A review of the impact of the *TEQSA Act 2011* on the higher education sector was completed in 2017.² That review was positive about the establishment of TEQSA as the national regulator and noted that the *TEQSA Act 2011* is broadly operating effectively and as intended. The review did not recommend changes that would significantly alter the regulatory framework or the role of TEQSA.

TEQSA's assessment of compliance with the Threshold Standards requires evidence of the ongoing academic quality and integrity of higher education operations. The protection of the quality of students' educational experience is of prime importance amongst the objects of the *TEQSA Act 2011* and is central to the Threshold Standards.

The Threshold Standards cover different areas of educational experience, including:

- student participation and attainment;
- learning environment;
- teaching;
- research and research training;
- institutional quality assurance;
- governance and accountability; and
- representation, information, and information management.

The Threshold Standards inform students and other interested parties of the expectations of higher education providers regarding the delivery of higher education in or from Australia. The Threshold Standards ensure that the barrier to entry into the higher education sector is set sufficiently high to underpin and protect the quality and reputation of the sector as a whole. These standards also establish a baseline for operational quality and integrity from which all providers can continue to build excellence and differentiation. The Threshold Standards set out the Australian Qualifications Framework (AQF) qualifications offered in higher education; the AQF is the national policy for regulated qualifications in Australian education and training.³

Part B of the Threshold Standards includes the PCS (see [Appendix C](#)). Part B also includes the *Criteria for Seeking Authority for Self-Accreditation of Courses of Study*, which TEQSA use as the basis for granting self-accrediting authority⁴ to higher education providers.

1.1.2 Original Purpose of the PCS and this Review

The PCS are based on the earlier *National Protocols for Higher Education Approval Processes* (National Protocols) which were first adopted by State and Territory governments in 2000, and then updated in 2007. The National Protocols were used by States and Territories for the regulation and accreditation of higher education prior to the establishment of TEQSA in 2011.

The purpose of the National Protocols was to assure students and the community that higher education institutions in Australia met identified criteria and were subject to appropriate government regulation. The National Protocols were designed to ensure consistent criteria and standards across Australia for the recognition of new universities, the operation of overseas higher education institutions in Australia, and the accreditation of higher education courses to be offered by non self-accrediting providers. Their development followed the attempt by new entrants of uncertain quality to operate in Australia, and the interest to protect the reputation of Australian higher education and its established public universities.

² See: Deloitte Access Economics. (2017). *Review of the Impact of the TEQSA Act on the Higher Education Sector – Final Report*. Australian Government Department of Education. Retrieved from: <https://docs.education.gov.au/documents/review-impact-teqsa-act-final-report>.

³ The AQF is currently under review. See [Appendix G](#) for more information.

⁴ Providers with self-accrediting authority have the ability to accredit and deliver courses of study within their institution without relying on external accreditation processes, namely that of the higher education regulator, TEQSA. Limited or unlimited self-accrediting authority is conferred upon providers who have met the criteria in Part B2 of the PCS. For more information see [Section 2.6](#).

In particular, the short-lived and controversial establishment of Greenwich University as a distance educator on Norfolk Island in the late 1990s highlighted the absence of an agreed national approach to higher education approvals and, in particular, a lack of protection of the term 'university'. Therefore, around the same time, the Government amended the *Corporations Act 2001* and associated regulations, to protect the title 'university' in Australia (see [Section 2.4.1](#)).

In 2008, the Australian Government initiated a Review of Australian Higher Education (Bradley Review) to consider the future direction of the higher education sector. The Bradley Review focussed on three key themes – access and participation, expanding the number of graduates from Australian universities to meet future needs, and establishing a national regulatory framework for higher education.⁵ A key recommendation was to focus on ensuring the quality of the higher education sector and the education it delivers. The Bradley Review identified that Australia must enhance its capacity to demonstrate outcomes and appropriate standards in higher education to remain internationally competitive. It called for the establishment of arrangements to assure the quality of Australian higher education and governance structures to be put in place to assist in meeting access and participation goals.

In consequence, the Bradley Review recommended the establishment of a national quality assurance and regulatory agency to support the adoption of a new regulatory framework for higher education accreditation and quality assurance. In 2009, the Government responded to the Bradley Review recommendation by announcing the establishment of TEQSA as a single national regulatory and quality assurance agency for higher education. With the establishment of TEQSA came new Threshold Standards that were tabled in Parliament in 2011. These initial Threshold Standards were largely based on the National Protocols that were already in existence at the time and comprised four separate sets of standards made under Section 58(1) of the *TEQSA Act 2011*:

- the Provider Registration Standards;
- the Provider Category Standards;
- the Provider Course Accreditation Standards; and
- the Qualification Standards.

The *TEQSA Act 2011* established the Higher Education Standards Panel (HESP) to advise and make recommendations to the Minister for Education in setting and varying the Threshold Standards. The first task of the HESP was to review the initial Threshold Standards, an activity which took place between 2012 and 2014. The PCS element of the Threshold Standards (Part B1) was not included in the 2012-2014 review.⁶ The HESP at that time concluded that provider categorisation is as much a matter of public policy as it is of standards for higher education and, as such, necessitated a separate piece of work. That examination is the focus of this PCS Review. Part B2: *Criteria for Seeking Authority for Self-Accreditation of Courses of Study* was included in that earlier review; however, it also has been included in this Review to ensure it encompasses the entirety of Part B of the Threshold Standards.

⁵ Bradley, D. (2008). *Review of Australian Higher Education: Final Report*. p.xiii. Retrieved from: <http://hdl.voced.edu.au/10707/44384>.

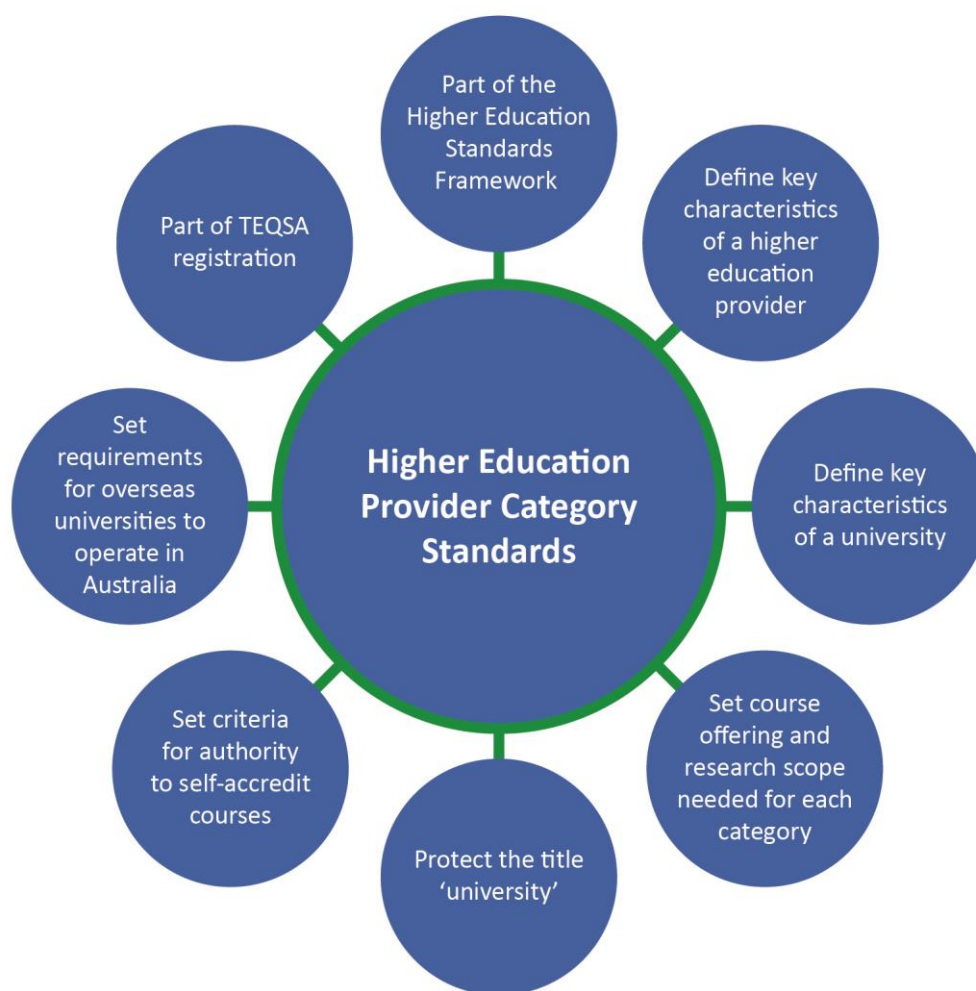
⁶ See: Higher Education Standards Panel. (2014). *Independent Review of the Higher Education Standards Framework*. Retrieved from: https://docs.education.gov.au/system/files/doc/other/report_on_the_independent_review_of_the_hes_framework_-_no_logo.pdf.

The revised Threshold Standards were introduced in October 2015 by the then Minister for Education and Training, Senator the Hon Simon Birmingham, and came into effect from 1 January 2017. The three sets of standards addressed in the initial review were significantly streamlined and restructured into a single unified framework that reflected the lifecycle of a typical provider's operations. Significant effort was made to remove all duplication that had existed in the initial Threshold Standards.

1.1.3 Current Role of the PCS

The PCS play a key role in safeguarding Australia's international reputation for high quality higher education. The PCS currently fulfil a range of functions, including to define the requirements of different types of providers in Australian higher education. They are also a regulatory tool for TEQSA during a provider registration or re-registration process. As part of the Threshold Standards, the PCS help to set the high standards required to operate as a higher education provider or university in Australia. Figure 1.1 sets out the various functions of the PCS.

Figure 1.1: Functions of the PCS



In the current PCS, all providers of higher education that gain registration by TEQSA through meeting the Threshold Standards become a higher education provider. This title signals to the public that they are a provider of quality higher education in Australia. Those providers that meet additional criteria may seek approval from TEQSA to be registered in one of the university categories.

There are currently six categories under the PCS which define expectations by provider type.

Table 1.1: Current PCS Category Descriptions

Provider Category	Criteria Overview
Higher Education Provider	The provider (Australian or overseas) meets Part A of the Threshold Standards and offers at least one accredited higher education qualification. The provider must have a clearly articulated higher education purpose and commitment to free intellectual inquiry and scholarship. The provider is not required to be engaged in research within its fields of study ⁷ unless offering higher degrees by research. The provider can apply for authority to self-accredit some or all of its courses.
Australian University	The provider meets the requirements of the 'Higher Education Provider' category, is self-accrediting, conducts research, and delivers undergraduate and postgraduate courses of study across a range of broad fields of study, including Masters Degrees (Research) and Doctoral Degrees (Research) in at least three of the broad fields of study it offers.
Australian University College	The provider meets the requirements of the 'Higher Education Provider' category, has realistic plans to meet the criteria for the 'Australian University' or 'Australian University of Specialisation' categories within five years, conducts research, and delivers undergraduate and postgraduate courses of study across a range of broad fields of study, including Masters Degrees (Research) and Doctoral Degrees (Research) in at least one of the broad fields of study it offers.
Australian University of Specialisation	The provider fulfils the same requirements as an 'Australian University', but is only required to offer qualifications and conduct research within one or two broad fields of study.
Overseas University	The provider must be recognised as a university by its home country and meet criteria equivalent to the 'Australian University' category.
Overseas University of Specialisation	The provider must be recognised as a university by its home country and meet criteria equivalent to the 'Australian University of Specialisation' category.

1.1.4 Shape of the Current System

Australia's higher education sector currently comprises 175 TEQSA registered providers, the majority of which are registered in the 'Higher Education Provider' category. Table 1.2 sets out the numbers of providers by provider category.⁸ Provider numbers fluctuate from time to time based on new, expired, or cancelled TEQSA registrations.

⁷ The terms 'field of study' and 'field of education' are used in this report to refer to the broad (2-digit), narrow (4-digit) and detailed (6-digit) fields defined by the Australian Standard Classification of Education (ASCED). See [Section 2.4.3](#) for more information about the terms, and the [Glossary and Definitions](#) for a full list of the broad fields.

⁸ Tertiary Education Quality and Standards Agency (TEQSA). (2019). *National Register Summary Table*. Retrieved 03/09/2019 from: www.teqsa.gov.au/national-register.

Table 1.2: Higher Education Providers by PCS Category

Provider Category	SAA ^(a)	Non-SAA	Total Providers	Student Numbers
Higher Education Provider	11	120	131	132,951 ^(c)
Australian University	40	0	40	1,396,633 ^(b)
Australian University College	1	0	1	1,343 ^(b)
Australian University of Specialisation	1	0	1	1,569 ^(b)
Overseas University	2	0	2	310 ^(b)
Overseas University of Specialisation	0	0	0	0
Total	55	120	175	1,532,806

Source: Tertiary Education Quality and Standards Agency (TEQSA). (2019). *National Register Summary Table*. Retrieved 03/09/2019 from: www.teqsa.gov.au/national-register.

Notes:

- SAA = self-accrediting authority (a provider can self-accredit some or all of its courses).
- Student numbers equate to a headcount of all students based on the latest available full year data. (Source: Australian Government Department of Education. (2017). *Selected Higher Education Statistics – 2017: Student Summary Tables*. Retrieved from: <https://docs.education.gov.au/node/51301>).
- As of 3 September 2019, there are 131 providers registered by TEQSA in the 'Higher Education Provider' category, however, the student numbers for this category are based on latest available data from the 133 providers active in 2016. The student numbers for this category include Avondale College of Higher Education (which became an 'Australian University College' in August 2019). (Source: Tertiary Education Quality and Standards Agency (TEQSA). (2018). *Statistics Report on TEQSA Registered Higher Education Providers 2018*. p.7. Retrieved from: <https://www.teqsa.gov.au/latest-news/publications/statistics-report-teqsa-registered-higher-education-providers-2018>).

Providers in the university categories include:

- 37 public universities;
- two private not-for-profit universities (University of Notre Dame Australia and Bond University);
- one for-profit university (Torrens University Australia);
- one university of specialisation (University of Divinity);
- two overseas universities (Carnegie Mellon University and University College London, although the latter neither has a dedicated campus nor offers courses in Australia);
- one university college (Avondale College of Higher Education); and
- zero overseas universities of specialisation.

Providers in the 'Higher Education Provider' category are diverse in their characteristics. They vary in size and disciplines offered, from very small niche providers to larger providers with breadth of offerings. Providers in this category include:

- not-for-profit providers including semi-autonomous Government bodies;
- for-profit providers (either Australian or overseas-owned), some with related vocational education and training (VET) provider companies;
- Technical and Further Education (TAFE) providers, where they offer higher education qualifications;
- faith-based colleges, some of which are standalone and others which are affiliated in a consortium;
- providers that specialise in one field of education and providers that have multiple fields of education;
- predominantly online providers; and
- providers that offer AQF Level 5 or 6 qualifications only and have a relationship with a university, or multiple universities, through articulation and credit recognition arrangements.

1.1.5 International Comparison of Regulatory Categories

There are no clear established international norms for the categorisation of tertiary providers and, consequently, individual countries adopt their own approaches. Some categorisation structures which embrace a tertiary approach encompass both higher education and VET, whereas others, like Australia, focus on higher education. Some countries utilise multiple categories for universities; others prefer just one. Some systems have categories for providers that specialise in specific types of education such as maritime studies, military instruction, or First Nations education; others only have categories for comprehensive providers. Some countries have systems where institutions can self-assert the 'university' title in the absence of regulatory authority, while others have the title granted by an education regulator or ministry of education as part of the process of classifying institutions.

In analysing selected systems globally, it is interesting to note that, with six categories, Australia – for the size of its population and sector – has one of the more prescriptive and complex regulatory frameworks for categorising higher education providers (see [Appendix F](#)).

Hence, there is capacity for Australia to consider a more simplified and streamlined approach to its PCS, while taking steps to ensure that the quality of the higher education sector remains high. There are some advantages in a simplified framework, especially in the context of adopting a pragmatic 'fit for purpose' approach. These include optimising the PCS by rationalising any underutilised or inefficient categories and supporting greater clarity and ease of understanding for consumers, both within and outside Australia. Chapter 2 sets out additional rationale in favour of simplifying the PCS.

1.1.6 Current Funding Arrangements

While the PCS are separate to funding, there is an appreciation that any changes to the PCS will need to entertain the possibility of future changes in policy settings, including funding implications.

The majority of higher education funding is administered under the *Higher Education Support Act 2003* (HESA). Funding set out under HESA includes:

- the Commonwealth Grant Scheme (CGS) through which the Australian Government subsidises tuition costs for domestic higher education students via Commonwealth Supported Places (CSPs);
- the Higher Education Loan Program (HELP) which provides income contingent loans to help students meet their study costs through programs including HECS-HELP,⁹ FEE-HELP,¹⁰ SA-HELP,¹¹ and OS-HELP;¹² and
- research block grants which provide block funding to eligible higher education providers for research and research training.

The following Table 1.3 provides an overview of provider access to funding under HESA. A more detailed list is available at [Appendix E](#).

⁹ HECS-HELP is a loan that helps students pay for their tuition fees if the student is enrolled in a CSP.

¹⁰ FEE-HELP is a loan that helps students pay for all or part of their tuition fees if they are full fee-paying students at an approved higher education provider.

¹¹ SA-HELP is a loan that helps students pay for all or part of their annual Student Services and Amenities Fee (SSAF).

¹² OS-HELP is a loan for students enrolled in a CSP who want to study some of their course overseas.

Table 1.3: Provider Access to Funding under HESA

Provider category	Number of providers in provider category ^(a)	Number of providers that currently receive CGS ^(b)	Number of providers currently approved to offer FEE-HELP ^(c)	Number of providers allocated research block grants ^(d)
Higher Education Provider	131	5	94	1
Australian University	40	38*	40	40
Australian University College	1	1	1	0
Australian University of Specialisation	1	0	1	1
Overseas University	2	0	2	0
Overseas University of Specialisation	0	0	0	0

Note:

* The two universities that do not currently receive CGS are Bond University and Torrens University Australia.

Sources:

- Tertiary Education Quality and Standards Agency (TEQSA). (2019). *National Register Summary Table*. Retrieved 03/09/2019 from: www.teqsa.gov.au/national-register.
- Higher Education Support Act 2003, Commonwealth Grant Scheme Guidelines 2012* and Australian Government Department of Education 2019 *Higher Education Provider's 2018-2020 Commonwealth Grant Scheme Funding Agreements*. Retrieved from: <https://docs.education.gov.au/node/49011>.
- Higher Education Support Act 2003* and Australian Government Department of Education 2019.
- Higher Education Support Act 2003, Other Grants Guidelines (Research) 2017, Commonwealth Scholarships Guidelines (Research) 2017*, and Australian Government Department of Education. (2019). *2019 Research Block Grant Allocations*. Retrieved from: <https://docs.education.gov.au/node/51901>.

While the share of Australian Government funding to higher education is weighted towards universities, this is a consequence of public policy choice and the current way in which higher education funding is administered, rather than the method in which providers are categorised within the PCS.

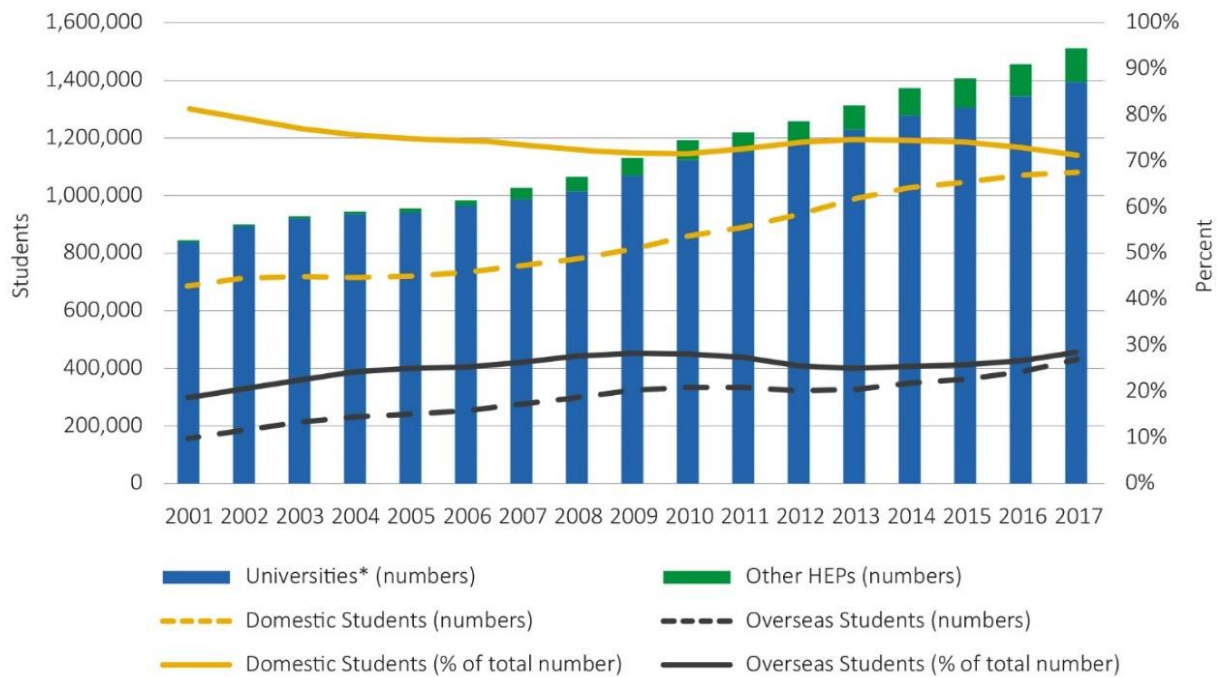
1.2 Changing Landscape

Since the establishment of the National Protocols in 2000, Australia's higher education sector has experienced significant change to the landscape in which it operates.

Over the last 20 years, there has been an almost doubling of the number of students in higher education in Australia, with an overwhelming majority studying at universities (see Figure 1.2). In 2000, fewer than 16 per cent of Australians aged 15-64 held at least a Bachelor qualification. In 2018, that figure is more than 31 per cent.¹³

¹³ Comparison of Australian Bureau of Statistics (ABS) Survey of Education and Work data from 2000 to 2018. Retrieved from: <https://www.abs.gov.au/ausstats/abs@.nsf/mf/6227.0>.

Figure 1.2: Student Numbers by Provider Type¹⁴



* Includes Table A, B and C providers under the Higher Education Support Act 2003.

International education is now Australia’s fourth largest export, worth \$35.2 billion to the economy in 2018¹⁵ and supporting over 240,000 jobs nationally.¹⁶ International students currently make up around a quarter of all higher education students in Australia;¹⁷ in 2000, there were just over 95,000 international students studying in higher education in Australia,¹⁸ today, that number has more than quadrupled to just over 431,000.¹⁹ The largest international student source countries (China and India) represent two important and rapidly growing bilateral partners for Australia.²⁰ Much of that international student presence is concentrated in business-related disciplines, an interesting quality and risk issue in its own right.

Over the last twenty years, technology and its application, the changing nature of work and industries, global connection and mobility, shifting demographics, and the preferences of consumers have all continued to influence new and different approaches to higher education as the sector has responded to emerging needs, challenges, and opportunities. Concepts such as massive open online courses (MOOCs), micro-credentials, and degree apprenticeships did not exist 20 years ago. The demand for higher education qualifications by employers has become a global phenomenon as countries increasingly shift to knowledge-based economies. Massification of higher education has also increased competition for Australia as other countries also position themselves to cater to the global appetite for higher education.

¹⁴ Australian Government Department of Education. (2018). *Selected Higher Education Statistics – 2017 Student Summary Tables*. Retrieved from: <https://docs.education.gov.au/node/51311>. (Latest publicly available full year data).

¹⁵ Australian Bureau of Statistics. (2018). *International Trade: Supplementary Information, Financial Year, 2017-18*. Retrieved from: <https://www.abs.gov.au/AUSSTATS/abs@.nsf/Lookup/5368.0.55.003Main+Features12017-18?OpenDocument>.

¹⁶ Australian Government Department of Education. (2018). *Jobs Supported by International Students Studying in Australia*. Retrieved from: https://internationaleducation.gov.au/research/Research-Snapshots/Documents/RS_Job%20supported.pdf.

¹⁷ Australian Government Department of Education. (2018). *Selected Higher Education Statistics – 2017 Student Summary Tables*. Retrieved from: <https://docs.education.gov.au/node/51311>. (Latest publicly available full year data).

¹⁸ Australian Government Department of Education. (2014). *Higher Education Students Time Series Tables – Selected Higher Education Statistics 2000*. p.37. Retrieved from: <https://docs.education.gov.au/node/35519>.

¹⁹ Australian Government Department of Education. (2018). *Selected Higher Education Statistics – 2017 Student Summary Tables*. Retrieved from: <https://docs.education.gov.au/node/51311>. (Latest publicly available full year data).

²⁰ Australian Government Department of Education. (2019). *Student Numbers*. Retrieved from: <https://internationaleducation.gov.au/research/DataVisualisations/Pages/Student-number.aspx>.

About two-thirds of the projected national employment growth over the next five to ten years will occur in the fields of health care and social assistance, construction, education and training, and professional, scientific, and technical roles.²¹ Of all those, roles providing pastoral and personalised care to our young, our sick, our elderly, and our disabled will be especially important areas of contribution to employment growth. Some roles across the above areas will require university-level education; for example, many of those in big data analysis, software applications, artificial intelligence, cybersecurity, and digital transformation. But the number of those IT-related jobs is likely to be dwarfed by the labour force needs of nursing, applied health care (especially for dementia and disability), teaching, and early years learning.²² It is also the case that providing for those employment needs, and delivering services to the community, will pose very different challenges in different parts of the nation. We already experience significant challenges in attracting and retaining professional expertise in regional centres and remote communities. For example, there is already a significant digital divide between city and country, reflected in lower levels of home-based work and lower levels of take-up of online government services in rural areas compared with larger urban centres.²³ Australia's higher education sector will need to continue to strengthen and innovate as it responds to these emerging needs and challenges.

To support these efforts, it is critical that the structures set in place for Australia's higher education sector enable, rather than impede, innovation while also maintaining a high expectation of quality. This all assumes a need for a PCS framework that will be fit for purpose and be helpful to the sector as it seeks to equip students and communities for a changing future.

1.2.1 Student Pathways

While this Review focusses on a discrete element of the tertiary landscape in Australia – the categorisation of higher education providers – it is important to be cognisant of the full range of consumer options that prospective students could consider upon entering post-school education.

In addition to a strong higher education sector, Australia has a substantial VET system. There are currently around 5,000 Registered Training Organisations (RTOs) in Australia including TAFE providers, adult and community education providers, private providers, community organisations, industry skills centres, and commercial and enterprise training providers.²⁴ Students studying an approved VET course may be eligible for a Commonwealth income contingent loan through VET Student Loans (which replaced the VET FEE-HELP scheme on 1 January 2017). Students may also be eligible for State-level subsidised funding.

The higher education (universities and other higher education providers) and VET sectors in Australia serve students in different and complementary ways. It is important that students have the full range of choices presented to them with all the benefits and differences evident; these include course costs, differences in outcomes and teaching styles, and the range of prospects that are fit for purpose for each individual student's needs.

²¹ Australian Government Department of Jobs and Small Business. (2018). *2018 Employment Projections for the Five-Years to May 2023*. Retrieved from: <http://lmip.gov.au/default.aspx?LMIP/EmploymentProjections>.

²² *ibid.*

²³ Australian Bureau of Statistics. (2018). *8146.0 - Household Use of Information Technology, 2016-17*. Retrieved from: <https://www.abs.gov.au/AUSSTATS/abs@.nsf/Lookup/8146.0Main+Features12016-17?OpenDocument>.

²⁴ Australian Skills Quality Authority (ASQA). (2019). *About RTOs*. Retrieved from: <https://www.asqa.gov.au/about/australias-vet-sector/about-rtos>.

“The difference between higher education and VET is becoming less distinct overtime. While VET may once have been focused on competency based training in relation to traditional trades and higher education associated with preparing graduates for the professions, there is little doubt that as we move into the 4th industrial revolution, the distinction between the two sectors is diminishing”.

National Tertiary Education Union submission to the PCS Review 2019, p.3

While higher education has typically been more curriculum based and VET more competency based, this distinction is becoming increasingly blurred as providers seek to meet the needs of students and employers, including through dual sector provider models.²⁵ Both lead to recognised Australian qualifications within the AQF and can have strong graduate outcomes.

However, there exists a sharp public focus and recognition of the advantages of university education. More than 50 per cent of young people who seek to undertake post-secondary education initially aspire to go to university.²⁶ This university-centred mindset will need to shift if Australia is to meet its future workforce demands and economic potential. As such, the tertiary pathway perspective for students needs to be reframed, from one where universities are viewed by many to be, essentially, the 'only game in town', to one where the roles, advantages, and likely outcomes of different pathways for students across Australia's tertiary education landscape are seen clearly and more complementarily.

This PCS Review, while focussing on the higher education sector, will seek to address the need for a shifting perspective of post-school options among students and the broader community.

1.3 Relationship with Other Reviews

This PCS Review has been conducted in proximity to a number of other important reviews, including the:

- Review of the Australian Qualifications Framework, led by Professor Peter Noonan;
- *Strengthening Skills: Expert Review of Australia's Vocational Education and Training System*, led by the Honourable Steven Joyce;
- *Independent Review into Regional, Rural and Remote Education*, led by Emeritus Professor John Halsey;
- *Performance-Based Funding for the Commonwealth Grant Scheme*, led by Professor Paul Wellings CBE; and
- *Independent Review of Freedom of Speech in Australian Higher Education Providers*, led by the Honourable Robert French AC.

While the PCS constitute a discrete part of the regulatory standards for the Australian higher education sector, the PCS cannot be viewed sensibly in isolation from this other work and the respective findings. This will ensure that the PCS are complementary to other efforts and reform. A summary of these Reviews and their potential interactions with the PCS Review are set out in [Appendix G](#).

²⁵ A dual sector provider is registered with both TEQSA and the Australian Skills Quality Authority (ASQA) (or in some cases a state regulator) and offers both higher education and vocational education courses.

²⁶ Australian Government Department of Education. (2017). *Longitudinal Surveys of Australian Youth, 2009 cohort (version 8.0)* Retrieved from: <https://dataverse.ada.edu.au/dataset.xhtml?persistentId=doi:10.4225/87/6BW27V>.

Chapter 2

Key Issues

The public submission and consultation process for this Review ([Appendix B](#)) demonstrates that the majority of Australian universities are comfortable with the current PCS. Other higher education providers, however, are distinctly less so. The discomfort from those in the 'Higher Education Provider' category predominantly relates to perceptions of a lack of prestige and differential regulatory requirements, including student funding matters. Overall, stakeholders acknowledge the contribution of the PCS in safeguarding Australia's high quality education system and international reputation. Most stakeholders support refinements to the current PCS to improve their utility and operation.

"Any revision to the PCS must be framed around enhanced quality. It is critically important to maintain Australia's excellent international reputation for quality higher education".

Group of Eight submission to the PCS Review 2019, p.3

This chapter outlines the key issues raised through the public submission and consultation process, and puts forward recommendations in response to these concerns. Key issues broadly fall into the following themes:

- **Fit for purpose** – ensuring the categories are fit for purpose for all stakeholders, including students, the regulator, and the education sector, both now and into the future;
- **Lifting cachet and reputation** – lifting the cachet of all higher education providers, creating greater differentiation of provider types; and
- **Brand protection** – protecting the international reputation of 'brand Australia' and confirming the roles and functions of universities in Australia.

Chapter 3 will then provide an overview of the proposed revised PCS model and examine how the PCS will serve the needs of students, the regulator, the sector, and the broader community, thus ensuring the PCS are 'fit for purpose' into the future.

2.1 Simplification of the PCS

The PCS currently comprise six categories encompassing 175 TEQSA registered higher education providers.²⁷ The majority of these providers are concentrated in two of the provider categories – the 'Australian University' category (40 providers) and the 'Higher Education Provider' category (131 providers).²⁸ The other four categories have been underutilised, suggesting a lack of obtainability or relevance due, in part, to technical issues. Additionally the 'Higher Education Provider' category is too undifferentiated given the large number and diverse nature of providers in that category. Comparison of Australia's categorisation of higher education providers internationally demonstrates that, for the size of its population and sector, the Australian categorisation is overly complex (see [Appendix F](#)).

²⁷ Tertiary Education Quality and Standards Agency (TEQSA). (2019). *National Register Summary Table*. Retrieved 03/09/2019 from: www.teqsa.gov.au/national-register.

²⁸ *ibid.*

2.1.1 'Australian University College' Category

Historically in the Australian context, university colleges were institutions that did not generally have degree conferring powers and functioned as arms of an established university. The expectation was that these institutions could, in time, become fully-fledged universities.²⁹ Indeed, many of Australia's current universities began as university colleges under this model. The earliest example is the University of New England which was originally established in 1938 as the New England University College, a college of the University of Sydney, before becoming a fully independent university in 1954.³⁰ Similarly, the institution which became James Cook University in 1970 began as an annex of the University of Queensland.³¹ A more recent example is the Sunshine Coast University College, which opened in 1996 before transitioning to full university status as the University of the Sunshine Coast in 1999.³²

Under the PCS, the 'Australian University College' category is a transitional category for a higher education provider with realistic and achievable plans to become an 'Australian University' within five years. Providers are required to self-accredit and deliver undergraduate courses across a range of broad fields of study. This includes postgraduate (coursework) courses in three broad fields of study and higher degrees by research in at least one broad field (as opposed to three broad fields as required in the 'Australian University' category). At present, the category only has one registered provider, Avondale College of Higher Education. TEQSA approved Avondale College's application for category change in late August 2019, the first and only successful application to the 'Australian University College' category since TEQSA's establishment in 2011.³³

The underutilisation of the 'Australian University College' category and its continued utility and necessity has been a topic of some contention throughout this Review. A small number of stakeholders believe that, with amendments to the criteria, there is value in retaining the category, particularly given:

- the historical context of university colleges in Australia;
- the domestic and international recognition of the term 'university college' as a degree conferring institution;
- the intended transitional nature of the category; and
- the ability for those successful in meeting the category requirements to adopt the 'university' title.

However, most stakeholders supported the removal of the 'Australian University College' category altogether, for a range of reasons explored below.

The current 'Australian University College' category requires providers to have "realistic and achievable plans to meet all the criteria in the 'Australian University' category within five years of its approval to use the title 'Australian University College'".³⁴ There is a general consensus that providers are highly unlikely to achieve the transition within the five year timeframe unless they are already mostly meeting the requirements of the 'Australian University' category at time of entry to the 'Australian University College' category. Therefore, there is a perceived level of redundancy with the category itself.

²⁹ Coaldrake, P. and Stedman, L. (1998). *On the Brink: Australia's Universities Confronting Their Future*. University of Queensland Press: St Lucia, QLD, p.11.

³⁰ University of New England. (2019). *About UNE*. Retrieved from: <https://www.une.edu.au/about-une>.

³¹ James Cook University. (2019). *History of JCU*. Retrieved from: <https://www.jcu.edu.au/about-jcu/history>.

³² University of the Sunshine Coast. (2019). *History and Growth*. Retrieved from: <https://www.usc.edu.au/explore/vision/history-and-growth>.

³³ Tertiary Education Quality and Standards Agency. (2019). *TEQSA approves application for an Australian University College*. Retrieved from: <https://www.teqsa.gov.au/latest-news/articles/teqsa-approves-application-australian-university-college>.

³⁴ Higher Education Standards Framework 2015. Part B1.3.1. Retrieved from: https://www.legislation.gov.au/Details/F2015L01639/Html/Text#_Toc428368878.

Furthermore, this timeframe requirement acts as a disincentive for providers, as failure to achieve 'Australian University' status may potentially result in perceived 'relegation'. Such an outcome would represent "substantial reputational risk for any provider considering this path".³⁵

Stakeholders also argue that the gap between achieving unlimited self-accrediting authority as a provider in the 'Higher Education Provider' category and applying for the 'Australian University College' category is too large. It is a challenge for higher education providers to meet the increased research benchmarks required by the 'Australian University College' category. This is particularly the case considering there is an expectation that aspiring higher education providers demonstrate a research profile of achievement and performance that compares favourably against existing Australian universities.

The difficulties are compounded when those seeking to enter the 'Australian University College' category (or indeed, any other university category) are precluded from accessing public research funding in order to help boost their research profiles. Although other sources of funding are available, it is difficult for a higher education provider to be "able to mount a credible bid for a university category, except in fields of education that do not require mobilising significant amounts of capital for research infrastructure".³⁶ This is because university research is "typically not self-financing [and] public research funding is primarily awarded according to past research performance, which makes it hard for new universities to build research output".³⁷ Therefore, the lack of access to research funding for providers in the current 'Higher Education Provider' category can make it challenging for providers to compete on the same scale or to the same quality as universities. Some stakeholders suggest that the category should be amended to require research and scholarship appropriate to institutional size and mission.

"The expectation that aspiring higher education providers can demonstrate research that benchmarks favourably against existing universities is unrealistic given vastly different operating contexts and funding arrangements".

Alphacrucis College submission to the PCS Review 2019, p.7

In an Australian context, the term 'college' can be used to represent a range of provider types including high schools, residential facilities, and existing institutions in the 'Higher Education Provider' category. Internationally, the use of the term 'college' can range from extremely prestigious higher education institutions to more community-based tertiary education providers. There are also concerns from some stakeholders that the title has "the potential to dilute the value of the term 'university'",³⁸ particularly if requirements for the category are loosened to enable it to be more accessible for providers.

This Review is mindful that, during the submission and consultation process, a number of providers indicated their intent to apply for 'Australian University College' status, highlighting the importance of maintaining some form of transitional category for providers who aspire for higher recognition and to one day become an 'Australian University' in their own right.

³⁵ Independent Higher Education Australia submission to the PCS Review. (2019). p.8. Retrieved from:

<https://submissions.education.gov.au/Forms/HEPCS/Documents/Independent-Higher-Education-Australia.pdf>

³⁶ Tertiary Education Quality and Standards Agency (TEQSA) submission to the PCS Review. (2018). p.14. Retrieved from:

<https://submissions.education.gov.au/Forms/HEPCS/Documents/Tertiary-Education-Quality-and-Standards-Agency.pdf>.

³⁷ Norton, A., Cherastidham, I., and Mackey, W. (2018). *Mapping Australian Higher Education 2018*. Grattan Institute. p.13.

Retrieved from: <https://grattan.edu.au/wp-content/uploads/2018/09/907-Mapping-Australian-higher-education-2018.pdf>.

³⁸ Edith Cowan University submission to the PCS Review. (2019). p.1. Retrieved from:

<https://submissions.education.gov.au/Forms/HEPCS/Documents/Edith-Cowan-University.pdf>.

In carefully considering the views of all stakeholders, this Review supports removing the 'Australian University College' category in favour of an overall rebalanced categorisation structure (two categories for universities and two categories for higher education providers which are not universities). This Review supports strong protection of the established reputation and cachet of universities in Australia, while also seeking to lift the identity and recognition of other higher education providers. It is proposed that this approach is supported through the establishment a new category for high-achieving higher education providers, enabling institutions to differentiate themselves through meeting higher standards and having the option to transition to university status at their own pace (see [Section 2.2.5](#)).

It will be important that the one recent entry to the 'Australian University College' category, Avondale College, is not disadvantaged by the changes recommended in this Review. This is also important for any higher education providers that may successfully enter the 'Australian University College' category prior to any changes to the PCS being adopted. This may require the legislative instrument giving effect to the recommendations of this Review to provide for appropriate transition arrangements.

2.1.2 'Australian University of Specialisation' Category

The 'Australian University of Specialisation' category is reserved for providers that fulfil the same requirements as an 'Australian University' but only deliver qualifications and conduct research within one or two broad fields of education.

At present, the category only has one registered provider, the University of Divinity. Some of the reasons stakeholders propose for the lack of uptake of this category (and, indeed, the 'Australian University' category) include:

- the challenge for an existing provider in the 'Higher Education Provider' category to confer Doctoral degrees for at least five years with self-accrediting authority;
- a lack of mentoring mechanisms available to new players in the market; and
- the requirement to compare prospective universities of specialisation against the same benchmarks (including research) as existing and publicly funded Australian universities.

A further complication with the 'University of Specialisation' category is that applicants for the category must only offer courses in one or two broad Australian Standard Classification of Education (ASCED) fields of education. This requirement "effectively limits the term 'specialisation' to pre-defined Australian Bureau of Statistics (ABS) reporting fields as opposed to equally valid alternative determinants".³⁹ This may restrict some potential applicants from applying and receiving 'University of Specialisation' status. For example, it may be challenging for a First Nations university to meet the requirements given that Indigenous research could be conducted across all broad fields of education. One suggestion is to add a field of education code for Aboriginal and Torres Strait Islander research, but "it would be unreasonable for an entity to have to wait for such an alignment in order to move forward with university aspirations, particularly in circumstances where all other specialisation criteria are being met".⁴⁰

Some stakeholders believe, too, that the 'Australian University of Specialisation' category should be removed as the requirement for research in only one or two broad fields is not viewed as adequate or broad enough to warrant the title 'university'.

³⁹ Batchelor Institute submission to the PCS Review. (2019). p.2. Retrieved from: <https://submissions.education.gov.au/Forms/HEPCS/Documents/Batchelor-Institute.pdf>.

⁴⁰ *ibid.*

However, there is merit in continuing to have available a suitable category for those providers wishing to specialise in one or two broad fields of education and also attain university status. Universities of specialisation can offer an extra layer of diversity to Australia's higher education landscape and can be leaders in teaching and research. Internationally, there are a number of highly regarded universities with a specialised focus in a range of fields including fine arts, performing arts, sport, and law. These include, for example:

The Rockefeller University in the United States which specialises in biomedical science, chemistry, and physics, and whose scientists have won a collective 25 Nobel Prizes;⁴¹

The London School of Economics and Political Science, one of the foremost social science universities in the world; and the University of the Arts London. The latter focusses on fashion, design and communication.

During the public consultation and submission process, a number of providers in the current 'Higher Education Provider' category indicated their intent to apply for 'University of Specialisation' status. As such, it can be argued that the category has the potential to grow in the future and, therefore, is still fit for purpose, despite its current underutilisation.

However, the continuing provision for universities with a specialised focus does not necessarily warrant a discrete category for such providers. As the University of Divinity advocates, "both applications for university status and TEQSA audits of universities should be against the same accountability and quality standards, irrespective of the entity's number of specialisations or broad fields of study".⁴² Universities with a specialised focus could therefore be incorporated into the 'Australian University' category, thereby simplifying the PCS and ensuring that the same standards apply to all universities.

This Review recommends that the criteria for the 'Australian University' category be amended to incorporate universities which TEQSA deem to have a specialised focus. For such universities, requirements relating to course offerings and research will be capped at either one or two broad fields of education and self-accrediting authority will be likewise limited. As such, Section 45(1) of the *TEQSA Act 2011* which sets out self-accrediting authority for Australian universities, will require amendment to accommodate universities with a specialised focus.

The proposed 'Australian University' category will consist of all the current Australian universities, both public and private, and the current university of specialisation. The criteria in this category will include provision for universities with a specialised focus to broaden their fields of education in consultation with, and guidance from, TEQSA.

2.1.3 'Overseas University' and 'Overseas University of Specialisation' Categories

Since the inception of the PCS, there have been only two registered 'Overseas University' providers: Carnegie Mellon University; and University College London, although the latter neither has a dedicated campus nor offers courses in Australia. An 'Overseas University of Specialisation' provider, on the other hand, has never been registered.

Some reasons for the lack of uptake by overseas universities to operate in Australia may include:

- different funding entitlements for Australian public universities and overseas universities, including access to public research grants;
- the relatively small Australian student population and a level of comfort by prospective students with the quality of Australian universities; and
- the costs and risks associated with running an overseas campus.

⁴¹ The Rockefeller University. (2019). *Awards and Honours*. Retrieved from: <https://www.rockefeller.edu/about/awards/>.

⁴² University of Divinity submission to the PCS Review. (2019). p.2. Retrieved from: <https://submissions.education.gov.au/Forms/HEPCS/Documents/University-of-Divinity.pdf>.

To operate in Australia, an overseas university must be recognised as a university by its home country and, in addition, meet criteria equivalent to the 'Australian University' category. There was consensus among stakeholders that these requirements are appropriate.

Some stakeholders suggest that the overseas university categories could be merged with the 'Australian University' category. However, the overseas university categories remain useful in helping consumers to differentiate those providers that have their primary operations overseas. Furthermore, that the PCS have discrete categories for overseas universities projects an important signal to the world, namely, that Australia is willing and confident to open its doors and work alongside (and in competition with) the best in the world.

However, following a similar streamlining and simplification approach as the 'Australian University' category, it is recommended that there be a single overseas university category that also includes provision for those that wish to have a specialised focus. To provide appropriate transparency, it is proposed that this category be designated 'Overseas University in Australia'.

Considering the sum of the issues with the current complex set of university categories, there is a strong case to simplify the PCS to ensure all categories are transparent, usable and fit for purpose. The Review proposes the current five university categories be replaced with two categories for universities: 'Australian University' and 'Overseas University in Australia'.

Recommendation 1

There should be a simplification of the current provider categories. Our universities are currently over-categorised, while all other higher education providers are grouped in a single undifferentiated category. The current five university categories should be reduced to two categories and the current single category for other higher education providers (that are not universities) should be increased to two categories.

Current Categories

Higher Education Provider
 Australian University
 Australian University College
 Australian University of Specialisation
 Overseas University
 Overseas University of Specialisation

Proposed Revised Categories

Institute of Higher Education
 National Institute of Higher Education
 Australian University
 Overseas University in Australia

2.2 The Undifferentiated Nature of the Current 'Higher Education Provider' Category

In the current PCS, 75 per cent of Australia's higher education providers are grouped into a single category, while the remaining providers – universities – may occupy five different categories. With 131 registered providers, this one 'Higher Education Provider' category represents the much larger share of providers, despite the vast majority of higher education students attending universities.⁴³ The 'Higher Education Provider' category encompasses a large range of institutions which vary in breadth, size, and quality (see [Section 1.1.4](#)). The variety of these institutions assists in meeting different student and industry needs.

Although it is the case that universities currently dominate higher education enrolments in Australia, and will likely continue to do so, this imbalanced categorisation structure provides a somewhat idiosyncratic representation of the sector. Providers in the 'Higher Education Provider' category also operate under different policy and funding arrangements to universities, which can pose competition challenges. A sharp focus on university-level education and research is both appropriate and understandable. However, the university 'verse' should not be (as it largely has become) the only one in Australia's post-secondary song sheet.

The characteristics of providers in the 'Higher Education Provider' category vary significantly. For example, some providers specialise in only one or two fields of education, while others offer qualifications across a broad range of fields. Providers are diverse in size, ranging from fewer than 50 students to more than 4,000.⁴⁴ Some providers have established research programs and offer qualifications up to Doctoral level (currently AQF Level 10), whereas others focus on teaching and learning across lower AQF levels. There are currently ten higher education providers that have limited self-accrediting authority and one with unlimited self-accrediting authority.⁴⁵ In addition to TEQSA, some providers seek third-party approval or endorsement of their courses, for example, from professional accreditation bodies. Around half of the providers in the 'Higher Education Provider' category are dual sector providers, registered with both TEQSA and the Australian Skills Quality Authority (ASQA) (or in some cases a state regulator) to deliver both higher education and VET.⁴⁶ Providers in the 'Higher Education Provider' category are not required to undertake research; however, if a provider chooses to do so, that research must meet the standards in Domain 4: Research and Research Training of Part A of the Threshold Standards.

The missions of these providers are often also very different, particularly as they seek to cater to different student groups, address varying community and industry needs, and adopt diverse teaching and learning approaches. The "emergence of tertiary offerings outside the public university sector is indicative of student interest in greater choice. Some students want vocationally oriented courses, more flexible delivery, access to faith-based qualifications [and] programs focussed on a particular area of employment".⁴⁷ Such higher education providers often point to their performance – particularly in learning, teaching, and student outcomes – to compare themselves favourably with universities.

⁴³ Tertiary Education Quality and Standards Agency (TEQSA). (2019). *National Register Summary Table*. Retrieved 03/09/2019 from: www.teqsa.gov.au/national-register.

⁴⁴ Tertiary Education Quality and Standards Agency (TEQSA). (2018). *Statistics report on TEQSA registered higher education providers 2018*. p.7. Retrieved from: <https://www.teqsa.gov.au/latest-news/publications/statistics-report-teqsa-registered-higher-education-providers-2018>.

⁴⁵ The ten providers with limited self-accrediting authority are: Alphacrucis College, Australian College of Theology, Batchelor Institute of Indigenous Tertiary Education, Excelsia College, Moore Theological College, Navitas Professional Institute, Sydney College of Divinity, The College of Law, The National Institute of Dramatic Art and Top Education Institute. The Australian Film Radio and Television School has unlimited self-accrediting authority.

⁴⁶ Tertiary Education Quality Standards Agency (TEQSA). (2018). *Key Financial Metrics on Australia's Higher Education Sector*. p.14. Retrieved from: https://www.teqsa.gov.au/sites/default/files/key-financial-metrics-dec-2018_0.pdf?v=1544561601.

⁴⁷ Davis, G. (2017). *The Australian Idea of a University*. Melbourne University Publishing Limited: Melbourne. pp.109-110.

There is a significant level of discomfort with the current PCS expressed by higher education providers who are not universities. The discomfort covers areas such as access to Commonwealth funding, market perception of disadvantage, costs to students, and differential regulatory requirements, specifically:

- access to CSPs being largely restricted to public universities (see [Section 2.2.1](#));
- the 25 per cent administration loan fee which providers may perceive as signalling to the market that the government views such providers as being of lesser quality and higher risk (see [Section 2.2.2](#));
- the perception of an overly arduous course accreditation process for most higher education providers compared to the self-accrediting authority held by universities;
- the lack of public knowledge about providers in the 'Higher Education Provider' category and consequent limited careers advice to students about these providers;
- the lack of access to the university title and the undeniable cachet it holds (see [Section 2.2.3](#));
- the undifferentiated nature of the single category for higher education providers which "fails to accord consideration to specialisation, excellence, maturity, reputation, or risk" (see [Section 2.2.4](#));⁴⁸ and
- a focus on broad minimum requirements rather than differentiation and excellence in the current 'Higher Education Provider' category (see [Section 2.2.4](#)).

While some of these matters are not directly within the remit of this Review, the Review does note the concerns. The recommendations seek to address some of these issues. It is important to note that some of the discomfort may reflect self-interest and does not necessarily mean that the public policy settings are unsound. However, the concerns are sufficiently noisy as to justify being unpacked in the following sections.

2.2.1 Access to Commonwealth Supported Places (CSPs)

One of the strategic goals of the 2008 Bradley Review was that there should be "an entitlement to a CSP for all domestic students accepted into an eligible, accredited higher education course at a recognised higher education provider".⁴⁹ However, with the exception of a few higher education providers with CSPs are still largely restricted to public universities (see [Appendix E](#)).⁵⁰ This means that students attending providers in the 'Higher Education Provider' category are required to meet the full costs of an unsubsidised place.

Some stakeholders believe that this could affect student choices about where to undertake higher education. Students may make choices based on course costs instead of a provider's particular specialisation, resources, or location even when such providers may place that student in a better position for graduate outcomes and career success.

⁴⁸ Holmesglen Institute submission to the PCS Review. (2019). p.2. Retrieved from: <https://submissions.education.gov.au/Forms/HEPCS/Documents/Holmesglen-Institute.pdf>.

⁴⁹ Bradley, D. (2008). *Review of Australian Higher Education: Final Report*. pp.6-7. Retrieved from: <http://hdl.voced.edu.au/10707/44384>.

⁵⁰ Australian Government Department of Education. (2019). *National Priority Areas*. Retrieved from: <https://heimshelp.education.gov.au/resources/glossary/National%20Priority%20Areas>.

2.2.2 FEE-HELP Loan Fee

Students enrolled in higher education courses can receive different types of funding to help cover the costs of their education depending on the types of providers they attend. If an undergraduate student attends an institution that is not eligible to offer CSPs, or the student is not offered a CSP, the student will be in a full fee paying place. The majority of these students attend providers in the current 'Higher Education Provider' category and may be eligible for a FEE-HELP loan to pay all or part of their tuition fees.

However, FEE-HELP students who are studying undergraduate courses must pay a 25 per cent loan fee (unless they are studying at a Table B provider).⁵¹ As a consequence, undergraduate students with FEE-HELP loans can end up paying 125 per cent of their course costs, plus indexation on the debt. This can create a cost difference between the same course of study offered by providers in different categories.

"Non-university higher education providers (NUHEPs), such as TAFE Queensland, while expected to participate in the same field as a university, do so without the same financial support and benefits for students".

TAFE Queensland submission to the PCS Review 2019, p.2

The disparity is evident when considering that there is no loan fee applied to HECS-HELP loans, the financial loan scheme for domestic students enrolling in a CSP place (the majority of whom are at universities). The FEE-HELP loan fee therefore may drive student volume towards universities, thus affecting student choice and the competitiveness of providers in the current 'Higher Education Provider' category. Hence, "a non-university student is arguably disadvantaged twice, that is, no CGS funding and incurrence of additional debt to obtain a student loan".⁵² For example, the total cost of a Bachelor of Business Studies at both a fictional Table A 'Australian University', 'Seamore University', and a fictional 'Higher Education Provider', 'Victoria Business and Management School', may be \$10,000. A domestic undergraduate student studying their first degree at Seamore University with a CSP would have some government subsidy towards the total course cost and no loan fee. However, the same student at Victoria Business and Management School is unlikely to have access to a CSP, would be required to pay the total cost of the course with no government subsidy and would also be required to pay an additional \$2,500 to cover the cost of the FEE-HELP loan.

"The funding model applied to students of Higher Education Providers (including a 25 per cent Administrative Fee [loan fee]) is not recognised in the PCS but certainly reinforces differentiation of status. The market quite rightly assumes that this fee is a reflection of a real difference in the degree to which the government recognises the quality of what is on offer – it does not assume the difference is merely administrative".

Macleay College submission to the PCS Review 2019, p.3

⁵¹ Table B providers are currently Bond University, the University of Notre Dame Australia, Torrens University Australia and the University of Divinity.

⁵² TAFE Queensland submission to the PCS Review. (2019). p.2. Retrieved from: <https://submissions.education.gov.au/Forms/HEPCS/Documents/TAFE-Queensland.pdf>.

2.2.3 Nomenclature

All providers of higher education (including universities) that gain registration by TEQSA through meeting Part A of the Threshold Standards become a 'higher education provider', as set out in Section 5 of the *TEQSA Act 2011*. While the term 'non-university higher education provider' is not adopted in the *TEQSA Act 2011* or the PCS, it has become a vernacular label within the sector to help differentiate between higher education providers and universities.

"The term HEP [Higher Education Provider] is very generic and since universities are also HEPs, perhaps there needs to be a different term or terms used for non-university HEPs to distinguish them from universities".

Charles Darwin University submission to the PCS Review 2019, p.3

Perhaps unsurprisingly though, the label 'non-university' does not sit well with many stakeholders. The term is criticised for its potential to transmit a negative and subordinate connotation and one which emphasises the characteristics a provider does *not* have rather than those it does. Similarly, the once common use of the term 'private higher education provider' is now less preferred, with the sector increasingly favouring 'independent higher education provider'.⁵³

Some stakeholders believe the label 'higher education provider' also fails to resonate well internationally, leading to difficulties for providers in both attracting international students and having their qualifications recognised by overseas bodies. There are difficulties for some providers explaining to international markets that they can confer qualifications across all AQF levels, in the circumstance they are accredited to do so. There are also challenges domestically, with some prospective students and their parents unaware that there are providers beyond universities that can offer higher education qualifications.

In order to resolve these issues concerning nomenclature, a few stakeholders argue that all higher education providers should have access to the 'university' title. However, the majority of stakeholders favour continued stringent protection of the use of the 'university' title, noting that all providers have the right to apply to TEQSA to become an 'Australian University' if they meet the additional requirements expected of that category. The main purpose of regulating the nomenclature of institutions is consumer protection. Nevertheless, in categories that do not have access to the 'university' title, there needs to be an appropriate title that recognises and values the contributions such providers make to students who choose to attend these institutions.

This Review recognises the important and complementary role of both universities and other higher education providers within the sector. Perceptions of disadvantage due to nomenclature should be addressed to support and lift all provider categories in the sector. In doing so, it is important to be cognisant of how a new category title might avoid some of the existing challenges with the 'higher education provider' label and help to raise cachet within the sector. A new title will also help to promote providers domestically and internationally, and reflect the distinction between universities and other higher education providers in order to better inform student choices.

⁵³ This includes, notably, the choice of the two major peak representative bodies for providers in the 'Higher Education Provider' category to change their names in 2019: the Council of Private Higher Education (COPHE) has become Independent Higher Education Australia (IHEA), and the Australian Council for Private Education and Training (ACPET) has become Independent Tertiary Education Council Australia (ITECA).

The *TEQSA Act 2011* uses the term 'higher education provider' to encompass both universities and other higher education providers. This is confusing to the public when one provider category is also given the dedicated title of 'Higher Education Provider'. Each provider category should have its own distinctive title. Therefore, this Review recommends the title 'Institute of Higher Education' be adopted for the current 'Higher Education Provider' category. Given that about half of the current providers in that category already use the term 'institute' in their trading titles, 'institute' was deemed a natural distinguishing title above other considered alternatives including 'academy', 'institution', or 'college'.

The category title will not have an impact on existing provider trading names. However, it will allow providers to market themselves as registered by TEQSA as an 'Institute of Higher Education'. As an example, a fictional Canberra College of Design may wish to market itself as 'Canberra College of Design, a registered Institute of Higher Education'.

Recommendation 2

In line with Recommendation 1, the current 'Higher Education Provider' category should be renamed 'Institute of Higher Education' category to build distinctiveness and to avoid confusion with the broad definition of 'higher education provider' under the *Tertiary Education Quality and Standards Agency Act 2011*.

2.2.4 Differentiation

There is an almost unanimous view from respondents – universities and other higher education providers alike – that a single 'Higher Education Provider' category does not sufficiently represent the differentiation of providers in this category. Furthermore, "categorising all higher education providers together does not support providers to strive for excellence, merely providing a broad minimum category standard".⁵⁴

"Australia's growing independent higher education sector however is currently grouped into a single category. This fails to recognise the diversity of providers in the independent education sector. [...] Greater category diversification within the HEP category would be more transparent, more facilitative, and more encouraging of development".

Independent Higher Education Australia submission to the PCS Review 2019, pp.1,4

Multiple options to subdivide the current 'Higher Education Provider' category were identified, two of which found most support – differentiation by provider type and by accreditation status. These have been considered in light of the preference to simplify the PCS.

⁵⁴ Independent Tertiary Education Council Australia (ITECA) submission to the PCS Review. (2019). p.6. Retrieved from: <https://submissions.education.gov.au/Forms/HEPCS/Documents/Independent-Tertiary-Education-Council-Australia-formerly-Australian-Council-for-Private-Education-and-Training.pdf>.

Differentiation by Provider Type

Two current provider types are identified by stakeholders as relatively distinct – pathway providers and TAFEs – and one potential future provider type – polytechnics. These providers are recognised for their distinct missions and operating structures, student profiles, and accountability and regulatory oversight arrangements.

Pathway providers

There are 14 pathway providers currently registered with TEQSA in the 'Higher Education Provider' category.⁵⁵ Pathway providers serve an important function in offering diploma or foundational courses to help prepare students for entry into higher degrees, often into the second year of a university course. Generally, pathway providers have a relationship with a specific university through articulation and credit recognition arrangements, but others may admit students into multiple universities.

A number of stakeholders suggest a discrete category for pathway providers for several reasons, including:

- pathway providers' courses do not extend beyond the current AQF Level 6 (Advanced Diploma and Associate Degree) and are therefore distinct provider types in the higher education landscape;⁵⁶
- pathway providers are often low risk providers and "by virtue of both academic outcomes and brand association, a significant portion of academic risk related to pathways provision is borne by the destination or 'owning' university";⁵⁷ and
- pathway providers often have complex accountability and regulatory requirements requiring oversight from both their affiliated university and TEQSA.

TAFE providers

There are 11 TAFEs currently registered with TEQSA in the 'Higher Education Provider' category.⁵⁸ TAFEs are publicly funded, highly regulated institutions with strong links to industry. All 11 of these TAFEs are dual sector providers and, for most of them, higher education forms a small component of their total course offerings and a minor proportion of their enrolments.⁵⁹ As of July 2019, no TAFEs have applied to TEQSA for limited or unlimited self-accrediting authority.⁶⁰ This may be due to cost and time constraints given their small higher education focus. Many students who enrol in higher education programs at TAFEs are mature age and come from disadvantaged cohorts. They may be career changers or have strong connections to their industry.⁶¹ A key aim of TAFEs across Australia is to respond to industry skill shortage needs and produce highly skilled and employable graduates.

Advocates for a discrete TAFE provider category argue:

- the public ownership and rigorous governance and corporate requirements set TAFEs apart from other higher education providers;
- TAFEs are mature institutions with long histories of quality education provision; and
- TEQSA has begun to separate TAFE data analytics in recent reports, indicating that a TAFE category would be a natural demarcation.⁶²

⁵⁵ Information provided by TEQSA. (June 2019).

⁵⁶ Tertiary Education Quality and Standards Agency (TEQSA) submission to the PCS Review. (2018). p.5. Retrieved from: <https://submissions.education.gov.au/Forms/HEPCS/Documents/Tertiary-Education-Quality-and-Standards-Agency.pdf>.

⁵⁷ Monash College submission to the PCS Review. (2019). p.4. Retrieved from: <https://submissions.education.gov.au/Forms/HEPCS/Documents/Monash-College.pdf>.

⁵⁸ Information provided by TEQSA. (June 2019).

⁵⁹ Tertiary Education Quality Standards Agency (TEQSA). (2018). *Key Financial Metrics on Australia's Higher Education Sector*. p.14. Retrieved from: https://www.teqsa.gov.au/sites/default/files/key-financial-metrics-dec-2018_0.pdf?v=1544561601.

⁶⁰ Information provided by TEQSA. (June 2019).

⁶¹ Melbourne Polytechnic submission to the PCS Review. (2019). p.3. Retrieved from: <https://submissions.education.gov.au/Forms/HEPCS/Documents/Melbourne-Polytechnic.pdf>.

⁶² See, for example: Tertiary Education Quality and Standards Agency (TEQSA). (2018). *Statistics report on TEQSA registered higher education providers 2018*. p.6. Retrieved from: <https://www.teqsa.gov.au/latest-news/publications/statistics-report-teqsa-registered-higher-education-providers-2018>.

Polytechnics

There is no single accepted definition of a 'polytechnic' and, consequently, the term is neither currently well understood nor consistently conceptualised in Australia or internationally. In broad terms, however, a polytechnic is typically a dual sector institute of tertiary education, with most qualifications focussing on education around applied technology. Polytechnics typically serve their local communities and are closely aligned with industry and the professions. There are currently three providers registered with TEQSA using the polytechnic label⁶³ and others who may market themselves as polytechnics internationally.

Advocates for a new category for polytechnics argue the category could:

- capture the increasing number of providers who deliver across both higher education and VET in Australia;
- create more of a 'third sector' which would "allow for a higher education institution to demonstrate evidence of scholarly depth in its teaching staff, without the requirement to meet the research standards required by a university";⁶⁴ and
- incentivise the creation of new, quality providers to develop technical skills needed for the future.

It is the case that TAFEs and pathway providers are distinctive, play vital roles in Australia's higher education sector, and exhibit differences in scope, funding, and purpose from other higher education providers. However, the Review is not persuaded that there is a clear regulatory or marketing benefit in creating discrete categories for pathway providers, TAFEs, or polytechnics. Although there are no specific categories in the PCS for such providers, there are also no limitations on polytechnics, TAFEs (within the constraints of State legislation), or pathway providers being established, and the increasing number of dual sector providers in Australia confirms this reality. Furthermore, this Review has highlighted a desire to simplify the PCS by streamlining the number of categories listed in the PCS.

Differentiation by Self-Accreditation Status

There are presently 11 providers in the current 'Higher Education Provider' category with limited (ten) or unlimited (one) self-accrediting authority (see [Section 2.6](#)).⁶⁵ Many of these providers are well-known for their specialised and high quality higher education offerings. For example, the Australian Film Television and Radio School is a premier screen arts and broadcast institution in Australia, Sydney College of Divinity is a leading provider of studies in theology and ministry, and the College of Law is the largest provider of practice-focussed legal education in the country.

There is a level of agreement among stakeholders that accreditation status is an appropriate distinction to signal differentiation of higher education providers that are not universities. Achieving self-accrediting authority is a clear demonstration that a provider has established a track-record of trust, accountability, and compliance with TEQSA, and shows a particular level of institutional maturity and quality in governance and teaching.

Some self-accrediting providers may have aspirations to become a university, but others do not as they have built their reputations and value on their distinctive roles and missions. Understandably, they tend to be both proud and protective of their identities.

⁶³ Tertiary Education Quality and Standards Agency (TEQSA). (2019). *National Register Summary Table*. Retrieved 03/09/2019 from: www.teqsa.gov.au/national-register.

⁶⁴ Monash University submission to the PCS Review. (2019). p.1. Retrieved from: <https://submissions.education.gov.au/Forms/HEPCS/Documents/Monash-University.pdf>.

⁶⁵ See footnote 45 for a full list of providers with self-accrediting authority.

2.2.5 A New Provider Category Reflecting Standing and Excellence

In line with stakeholder views and to promote providers of high quality, the Review recommends the creation of a new provider category. This subsection explores the benefits of the proposed category, the requirements such providers would be expected to meet, the functions of the category, and the purpose of the proposed title to be attached to the category.

Requirements

Due to the high bar associated with self-accreditation, as explored in the previous subsection, the Review recommends that self-accreditation be one of the defining features of the proposed category. To enter this category, providers would be required to have self-accrediting authority for at least 70 per cent of the courses they deliver. This threshold would ensure that those in the category have a large majority of their courses having met additional quality criteria, thus demonstrating the high standing and maturity of the provider.

"Given the significant status that is associated with holding SAA [self-accrediting authority], and the practical consequences of not having to seek TEQSA accreditation of courses within SAA scope, and that SAA is a fixed stepping stone to gaining registration in a university category, it is proposed that SAA warrants inclusion as a separate HEP category."

Independent Higher Education Australia submission to the PCS Review 2019, p.5

Providers would also be expected to meet a range of quality benchmarks in addition to self-accrediting status, a number of which are the same as those expected of providers in the 'Australian University' category. This parity would further elevate the standing of the new category and recognise the ability of these providers to meet additional requirements.

The proposed additional criteria, set out in detail in [Appendix D](#), relate to:

- superior student outcomes;
- mature processes for course design, quality assurance and maintenance of academic integrity;
- systematic support for scholarship;
- depth of academic leadership;
- good practices for teaching and learning that can be shared with the sector; and
- genuine engagement with employers, industry and/or the professions to inform teaching and learning.

Functions and Purpose

The creation of a discrete category based on self-accrediting authority status and other quality criteria would recognise the achievements of high performing providers, elevate their standing, and build distinctiveness. For providers, the category would serve multiple functions:

- an **aspiration** category for providers to reach;
- a **destination** category for providers to remain within so long as they continue to meet the additional standards; or
- a **progression** category for those providers with plans to become a university in the future.

Unlike the existing 'Australian University College' category, which was originally designed for the last of those purposes, there would be no limitation on the length of time a provider may remain in the category and no requirement to indicate an intention to apply for university status. That the category would also function as a destination category in its own right is vital for those high performing higher education providers that have no desire to become a university.

"Many students enrol at AFTRS because we are *not* a university".

Australian Film Television and Radio School submission to the PCS Review 2019, p.2

The category could be useful for students by differentiating providers to enable them to make better choices about their post-school education options. The creation of a new category may also assist students in the international recognition of their qualifications. The proposed category would be a positive addition to the higher education landscape for students who choose to study with these high-performing providers.

While the threshold for institutions entering the category is high, it is envisioned that a number of different types of providers will be eligible to enter the category. For example, there are no requirements for breadth of courses, provider size, or AQF offerings. As such, specialised or comprehensive institutions offering postgraduate and/or undergraduate qualifications may be able to enter the category. There is also the possibility that universities may wish to partner with institutions in the category, or create subsidiary providers to be registered in the category, to increase their scope of delivery.

There also could be opportunities for Government to consider how it may best support and utilise providers designated in the proposed category. This includes how Government may wish to strategically target these providers to help meet policy objectives and stimulate differentiation, innovation, and excellence. This may be the case going forward in areas of regional or national need and job growth. Examples might include health care and social assistance, construction (including architecture and civil engineering professionals), education and training, and professional scientific and technical services. Almost two in every three new jobs created in the next five years will likely come from these four industries.⁶⁶

Category Title

It is essential that a category of such national standing attract a distinctive title that conveys a clear signal of national quality recognition. The Review has carefully considered a wide array of possible labels for this category, including the many put forward by stakeholders. Such titles included variations of terms such as polytechnics, advanced colleges, advanced institutes, national academies, and institutes of national standing. These options were not preferred for various reasons, the most common of which was that the terms were already being used, or have been used in the past, for different purposes in the tertiary sector. This Review took the view that some past associations of particular terminology was problematic.

⁶⁶ Australian Government Job Outlook. (2019). *Future Outlook*. Retrieved from: <https://joboutlook.gov.au/FutureOfWork>.

From the range of options considered, the title 'National Institute of Higher Education' was viewed as the most appropriate term to project and reflect the quality and standing of providers in the proposed category. The use of the term 'national', particularly, reflects the intended national standing of these providers, rather than their geographical location. The likeness of the proposed category name to the National Institutes Program⁶⁷ is noted, however, this Review is of the opinion that given the small-scale nature of that program, it should not be an issue of major concern.

The proposed title is not intended to replace the marketing or branding of the providers who would apply to enter the category. Providers may use the category title as they see fit in relation to their broader marketing strategy. As an example, a fictional 'Queensland Academy of Business' might retain the brand but promote itself as 'Queensland Academy of Business, a National Institute of Higher Education'.

There is a strong case for the title 'National Institute of Higher Education' to be a legally protected term. This would ensure consumer protection and prevent institutions that have not met the quality benchmarks of the category to use the title in a business or company name, or represent themselves as registered within the category if they are not. If the term 'National Institute of Higher Education' is not protected, there is a risk that the term could be devalued, and the benefits of the new category could be diminished. Protection of the term could be afforded through amending the *Business Names Registration (Availability of Names) Determination 2015*, the *Corporations Act 2001*, and associated regulations, similar to the protections currently in place for the 'university' title (see [Section 2.4.1](#)).

Other Considerations

There was consideration of creating an additional category for providers with self-accrediting authority who also conduct research. On balance, however, there were insufficient advantages to warrant creation of a third category of higher education provider. The recommended 'National Institute of Higher Education' category would have the flexibility to accommodate providers that may conduct research without requiring such providers to do so.

Consideration was also given to drafting the criteria to allow entry of providers that may not have self-accrediting authority, but otherwise meet criteria of a similar standing to self-accrediting authority. However, when considering the future architecture of the higher education system, a move towards more providers striving for self-accrediting authority is advantageous. Gaining self-accrediting authority signals that providers are progressing. That is to say, self-regulation carries a level of trust and understanding that a provider engages TEQSA where necessary, and TEQSA intervenes only when providers prove to be unable to meet their responsibilities.⁶⁸

⁶⁷The National Institutes Program is run by the Department of Education and delivers additional funding to four higher education providers in recognition of the role they play in facilitating key activities that are of national significance.

⁶⁸Lee-Dow, K. and Braithwaite, V. (2013). *Review of Higher Education Regulation Report*. p.25. Retrieved from: <https://docs.education.gov.au/node/33587>.

Recommendation 3

In line with Recommendation 1, a new category titled 'National Institute of Higher Education' should be created to serve aspiration, destination, or progression purposes. This category will be reserved for the highest performing higher education providers which are not universities. National Institutes of Higher Education will be recognised for meeting additional criteria to those required of other higher education providers outside the universities and will have a significant measure of self-accrediting authority status.

Item	Related Action
'National Institute of Higher Education' category	The Australian Government should consider policy arrangements that may support high quality providers that can meet the standards of the new 'National Institute of Higher Education' category.

2.3 Diversity and Expansion of the Higher Education Sector

The number of universities in Australia has stayed relatively static since the Dawkins reforms in the late 1980s. Over a similar period the number of other higher education providers has increased, but still represents only around 10 per cent of the total higher education student cohort.⁶⁹ The rate of growth of higher education providers has been significant over a relatively short period of time, with the number of providers almost doubling between 2008 and 2019.⁷⁰

Part of this Review's remit is to consider how the PCS will serve populations into the future. Although Australia already has a comprehensive and, many argue, diverse higher education sector, it is likely that Australia will continue to need an increased variety and range of offerings for the ever changing world of work. It is, and will be, critical that the higher education sector is comprised of higher education providers of different sizes, locations, and missions offering differentiated, innovative, and flexible higher education options to accommodate diverse student populations and communities. Such differentiation encourages and enables students to choose institutions that best suit their educational goals and abilities, stimulates social mobility, enables the higher education sector to meet labour market needs, and encourages competition which can help continuously lift performance of the sector.⁷¹

The previous discussion in [Section 2.2.5](#) introduced the proposal of a new 'National Institute of Higher Education' category to, in part, serve this purpose. In the future, there also may be the potential for the number of universities, specialised or comprehensive, to expand. The number of dual sector providers also may rise as students seek education that merges the benefits of both the VET and higher education sectors.

⁶⁹ Australian Government Department of Education. (2017). *Selected Higher Education Statistics – 2017: Student Summary Tables*. Retrieved from: <https://docs.education.gov.au/node/51301> (Latest publicly available full year data); and Tertiary Education Quality and Standards Agency (TEQSA). (2018). *Statistics Report on TEQSA Registered Higher Education Providers 2018*. p.7. Retrieved from: <https://www.teqsa.gov.au/latest-news/publications/statistics-report-teqsa-registered-higher-education-providers-2018>.

⁷⁰ Bradley, D. (2008). *Review of Australian Higher Education: Final Report*. p.145. Retrieved from: <http://hdl.voced.edu.au/10707/44384>; and Tertiary Education Quality and Standards Agency (TEQSA). (2019). *National Register Summary Table*. Retrieved 03/09/2019 from: www.teqsa.gov.au/national-register.

⁷¹ LH Martin Institute and the Australian Council for Educational Research. (2013). *Profiling Diversity of Australian Universities*. p.6. Retrieved from: https://research.acer.edu.au/cgi/viewcontent.cgi?article=1035&context=higher_education.

No matter the scenario, or choice of provider type, it is likely that the number of students seeking higher education qualifications will rise in the future. This is in part due to population growth, international reputation, and the continued importance of higher education qualifications for the workforce. This also has been historically the case, with the number of domestic higher education students increasing by more than 700,000 since the year 2000.⁷²

To prepare for the possibility of growth, support differentiation, innovation, and excellence, and to enable the higher education sector in Australia to maintain its strong reputation, TEQSA should develop a framework to guide providers who wish to change provider category. Such providers could include those seeking to enter the higher education sector, providers who wish to attain self-accrediting status and apply for registration in the proposed 'National Institute of Higher Education' category, or, indeed, for those providers seeking 'Australian University' status. In addition to TEQSA's current extensive range of guidance notes,⁷³ such a framework may assist providers with more transparent and clear directions on requirements and procedures. Such guidance could encourage new entrants, foster innovation, and ensure stakeholders are aware of TEQSA's processes.

Recommendation 4

The Higher Education Provider Category Standards must enable providers to transition to other categories and grow their course and research offerings. This should be complemented by a guidance framework developed by the Tertiary Education Quality and Standards Agency. This will better assist providers in their successful transition to other categories and will both encourage and support excellence, differentiation, and innovation.

2.4 'Australian University' Category

There are currently 40 providers registered in the 'Australian University' category, which account for over 90 per cent of higher education student enrolments.⁷⁴ The PCS framework sets out the established norm of what it means to be a university in Australia. The requirements to be registered in the 'Australian University' category include teaching, research, sustained scholarship, community engagement, and mature quality assurance processes.

As with providers in the current 'Higher Education Provider' category, Australia's universities exhibit a range of characteristics. Some universities are set in regional areas, others in metropolitan centres. Most are publicly funded. Universities are diverse in size ranging from fewer than 1,000 students to more than 60,000 students with 90 per cent of providers enrolling more than 5,000 students.⁷⁵ The number of PhD completions per university varies from more than 700 to fewer than 20 a year.⁷⁶ All universities are self-accrediting and most also seek external accreditation or recognition, for example, from professional bodies. There are 15 dual sector universities that also cater to VET students, while other universities focus on higher education alone.⁷⁷

⁷² Comparison of Australian Bureau of Statistics (ABS) Survey of Education and Work data from 2000 to 2018. Retrieved from: <https://www.abs.gov.au/ausstats/abs@nsf/mf/6227.0>.

⁷³ TEQSA's current range of guidance notes are available here: <https://www.teqsa.gov.au/guidance-notes>.

⁷⁴ Tertiary Education Quality and Standards Agency (TEQSA). (2018). *Statistics report on TEQSA registered higher education providers 2018*. p.5. Retrieved from: <https://www.teqsa.gov.au/latest-news/publications/statistics-report-teqsa-registered-higher-education-providers-2018>.

⁷⁵ Australian Government Department of Education. (2018). *Selected Higher Education Statistics – 2017 Student Summary Tables*. Retrieved from: <https://docs.education.gov.au/node/51311>. (Latest publicly available full year data).

⁷⁶ Australian Government Department of Education. (2017). *Higher Degrees by Research Completions Time Series*. Retrieved from: <https://docs.education.gov.au/documents/hdr-completions-time-series>.

⁷⁷ Tertiary Education Quality Standards Agency (TEQSA). (2018). *Key Financial Metrics on Australia's Higher Education Sector*. p.14. Retrieved from: https://www.teqsa.gov.au/sites/default/files/key-financial-metrics-dec-2018_0.pdf?v=1544561601.

2.4.1 The 'University' Title

The term 'university' is highly protected and regulated in Australia. Under Section 108 of the *TEQSA Act 2011*, only providers registered in one of the current university provider categories are eligible to use the title 'university'. Furthermore, under the *Business Names Registration Act 2011*, the *Corporations Act 2001*, and associated regulations, an application to register a business or company name with the Australian Securities and Investments Commission (ASIC) that includes the word 'university' must be accompanied with the consent of the Minister for Education. Stakeholders overwhelmingly support continuing stringent protections for the title 'university'.

"The term 'university' is emblematic of the reputation for excellence that our higher education system enjoys. To an external audience, the term 'Australian University' represents the sum of the elements of all Australian universities – student-centric regulated high-quality research-informed higher education. It is well understood and trusted".

University of Canberra submission to the PCS Review 2019, p.1

There is a distinct market advantage for use of the 'university' title. The term is well understood internationally and is "synonymous with high quality tertiary-level education".⁷⁸ The title 'university' carries connotations of high quality, high status and a strong reputation.

This reputation draws both domestic and international students, facilitates recognition of qualifications, and helps raise the employability of graduates from Australian universities. In Australia, as is mostly the case internationally, the term 'university' is also associated with the dual functions of teaching and research.

2.4.2 Teaching and Research in Universities

The university cachet derives from the valued international reputation of our universities and the common international association of universities as places in which teaching, and the creation of new knowledge are pursued (notwithstanding some international exceptions).

"At universities in Australia and around the world, research informs teaching and contributes to the educational environment of the institution. This means that university teaching is up-to-date with the latest knowledge and findings in the field. It also supports the open-ended, critical, enquiry-based learning that is fundamental to university teaching and learning, and to the university student experience".

Universities Australia submission to the PCS Review 2019, pp.1-2

⁷⁸ Edith Cowan University submission to the PCS Review. (2019). p.1. Retrieved from: <https://submissions.education.gov.au/Forms/HEPCS/Documents/Edith-Cowan-University.pdf>.

In Australia, a requirement for providers that hold the 'university' title is to conduct teaching and research. This is a requirement under the PCS and the majority of State and Territory legislation establishing universities. It is also an expectation of students and the broader community. The rationale for this requirement includes:

- the positive and long-lasting impact research can have on transforming society and industry through strong collaboration with community and industry;
- the enhancement of the global competitiveness and prestige of Australia's universities through strong performance in international rankings;
- the creation of quality pedagogical practices and teaching based on current research;
- the importance of creating up-to-date and innovative knowledge and ensuring students are educated with this latest knowledge;
- the exposure of students to leading researchers which can, in turn, equip students with the ability to conduct their own research and discovery;
- the contribution of research to Australia's economic and social prosperity; and
- the connection between research, quality teaching and positive student outcomes (commonly known as the teaching-research nexus).

Among the many justifications for conducting teaching and research in universities is the 'teaching-research nexus', that is, the principle that "close proximity to world-class researchers makes students more engaged, develops their critical thinking, aids their research skills, and keeps them up to date with the latest research findings".⁷⁹ This principle attracted significant attention by stakeholders during this Review. While most stakeholders are supportive of the synergies between teaching and research, others point to contested empirical evidence to support the nexus in practice.

While the teaching-research nexus may sometimes be contested at the level of the individual academic, there was very strong support during the Review's consultations – from both the universities themselves as well as from other higher education providers – for the cachet of the term 'university' to be maintained and, indeed, strengthened. Specifically, there remains a strong view that a university should be a place of both teaching and research, nourishing a rich scholarly environment for students and for the benefit of the broader community.

"Research enriches teaching and learning, particularly where teaching staff are also involved in research. Research activities and the advancement of knowledge enrich the intellectual life of a university and contribute to an environment where academic excellence and independent inquiry are encouraged. [...] [It provides students] with exposure to career options and endeavours that they would otherwise not see. It provides inspiration for regional, rural and remote students to pursue higher degrees by research".

Regional Universities Network submission to the PCS Review 2019, p.2

Nevertheless, some associated views with our understanding of the term 'university' were aired during consultations. Those included the current lack of definitions for research quality and quantity, scholarship, and the link between research and student experience. This Review also invited views regarding the possibility of 'teaching-only' and 'research-only' universities in the future.

⁷⁹ Productivity Commission. (2017). *Shifting the Dial: 5 Year Productivity Review*. Report no. 84. Canberra. p.108. Retrieved from: <https://www.pc.gov.au/inquiries/completed/productivity-review/report>.

Teaching-Only and Research-Only Universities

The 2017-2018 Higher Education Budget Reform Package that included announcement of this Review indicated that teaching-only universities would be considered as part of this work. The overwhelming majority of stakeholders do not support the idea of a university that does not undertake research. Stakeholders appreciate that a large part of the strong international reputation of Australian universities lies with the role and impact of research. Almost all stakeholders are amenable to teaching-only providers existing in the higher education sector, as they currently do, but question such providers having access to the university title.

The limited number of stakeholders who do advocate for teaching-only universities point to the creation of universities that would be focussed on providing high quality teaching. These stakeholders argue that greater recognition and emphasis on teaching profiles within universities would boost Australia's international standing. Some stakeholders put forward the view that removing research requirements would allow universities to more closely focus on their other fundamental features such as teaching, community engagement, and student experience. However, this Review strongly supports the notion that universities should conduct both teaching and research.

This Review also considered the possibility of introducing research-only universities, that is, universities that would only be required to undertake higher degrees by research without teaching undergraduate students. There is very limited support for this concept; most argue that research institutes that only offer Doctoral degrees would not be able to provide a sufficiently supportive teaching environment that would extend outside of specific fields of research. Nor would this type of institute, that does not teach undergraduate students, satisfy community expectations of an Australian university.

2.4.3 Research Requirements

There are many definitions of research. For the purposes of the Threshold Standards, TEQSA defines research as "academic activities of a higher education provider that contribute to new knowledge through original investigation".⁸⁰ This definition points to a requirement that research be systematic, planned, and purposive. Research can be carried out in all academic disciplines and may involve a range of tools, methodologies, and media. TEQSA also has regard for the Higher Education Research Data Collection (HERDC) definition, which is supported by the Excellence in Research for Australia (ERA) assessment, of research being "the creation of new knowledge and/or the use of existing knowledge in a new and creative way so as to generate new concepts, methodologies and understandings".⁸¹

Overall, Australia performs well internationally in research. Australia has just 0.3 per cent of the world's population but produces 2.6 per cent of the world's published scientific research.⁸² In the latest ERA rankings, 89 per cent of Australia's university research areas were rated as at world standard or above.⁸³ Australia's "university research is skewed towards scientific and technological fields, with medical research a priority".⁸⁴ It is also worthwhile to note that over half (53 per cent) of research expenditure⁸⁵ is accounted for by the following four fields of research – Medical and Health Sciences, Engineering, Biological Sciences, and Studies in Human Society.⁸⁶

⁸⁰ Tertiary Education Quality and Standards Agency (TEQSA). (2018). *Guidance Note: Research and Research Training*. p.1. Retrieved from: https://www.teqsa.gov.au/sites/default/files/guidance-note-research-and-research-training-v1-3_0.pdf?v=1530748445.

⁸¹ *ibid.* p.1.

⁸² Universities Australia. (2019). *Australia's World Class University System: At a Glance*. p.5. Retrieved from: <https://www.universitiesaustralia.edu.au/wp-content/uploads/2019/06/Data-Card-2017-v25.pdf>.

⁸³ *ibid.*

⁸⁴ Norton, A., Cherastidham, I., and Mackey, W. (2018). *Mapping Australian Higher Education 2018*. Grattan Institute. p.41. Retrieved from: <https://grattan.edu.au/wp-content/uploads/2018/09/907-Mapping-Australian-higher-education-2018.pdf>.

⁸⁵ Here, research expenditure includes general university funds and Australian competitive grants.

⁸⁶ Australian Bureau of Statistics (2018). *8111.0 – Research and Experimental Development, Higher Education Organisations, Australia*. Retrieved from: <https://www.abs.gov.au/ausstats/abs@.nsf/mf/8111.0>.

Quality and Quantity of Research

There is great diversity in the quality and quantity of research outputs by Australian universities. Some universities conduct research and deliver higher degrees by research in most fields of education, others in relatively few fields. Some universities conduct research at or above world standard across their entire academic profile, others in relatively few. Although the requirement for universities to undertake both teaching and research is set out in the PCS, there are currently no definitions for the quality or quantity of research required, which partly accounts for this diversity.

Current Requirements

On narrowest interpretation, to achieve 'Australian University' status, a provider could demonstrate the research requirements by delivering a single undergraduate and postgraduate course, undertaking a single research project in each of the three required fields of education in a given year, and publishing at least one peer-reviewed paper from each project in any form at any level of quality. This possibility is concerning as such a level of research at an 'Australian University' would not meet any meaningful or reasonable threshold for research performance expected by TEQSA or the wider community.

"The PCS specify research activity across fields of research, but not the quantum of activity necessary to be identified as research active. This has implications for how universities approach research, the utilisation of intermediary university categories, and regulation of other providers".

Deakin University submission to the PCS Review 2019, p.2

Some stakeholders advocate for research requirements to remain unchanged as research activities are fluid and can be problematic to define. The Review accepts the complex nature of the issue, though is of the view that there is value in providing more specific requirements in the PCS relating to the quality and quantity of research. Doing so would assist in setting research benchmarks in Australian universities, alleviate confusion with, and ambiguity of, research requirements, and ensure universities are conducting research of a scale and quality that is in line with community and regulator expectations. Clearer guidance would also assist TEQSA in its regulatory decisions, while still providing flexibility in how research is measured.

The 'Australian University' category criteria currently require universities to offer Masters Degrees (Research) and Doctoral Degrees (Research) in at least three broad fields of study and undertake research that leads to the creation of new knowledge in at least those three broad fields. Most stakeholders are satisfied with these current quantity requirements as they help ensure appropriate scales of enterprise. However, given that most Australian universities are already comprehensive institutions delivering courses across a large number of fields of education, there is scope to increase the quantity requirements. Doing so would augment the synergies between research and student teaching and learning, enhance the global competitiveness of Australia's universities, and maximise student opportunities to engage with research expertise and experiences across a wide range of disciplines.

Proposed Revisions to Research Requirements

The Review proposes that universities be expected to deliver Doctoral Degrees (Research) in at least three, or at least 50 per cent, of the broad (2-digit) fields of education where courses are delivered, whichever is greater. This is an increase in requirements from the current PCS for larger universities. However, for such large universities, which may offer courses in a number of fields of education, undertaking research and offering Doctoral Degrees (Research) in more than three fields of education is a reasonable and worthwhile expectation. For smaller institutions that may only be offering, for example, three or four broad fields of education, the requirement remains as offering Doctoral Degrees (Research) in at least three broad fields of education.

There are currently no quality requirements for research in the PCS. To uphold the strong reputation of Australia's universities and research capabilities, it is proposed that universities conduct world standard research in at least three, or at least 30 per cent of the broad (2-digit) fields of education where courses are delivered, whichever is greater. This requirement is a reasonable expectation given that "it would be hard to defend the proposition that the level of research being undertaken in a university of any kind would be *below world standard*".⁸⁷

Over time, research requirements should be further augmented. It is strongly arguable, for example, that by 2030 all current universities should be required to undertake world standard research in at least three, or at least 50 per cent, of the broad (2-digit) fields of education where courses are delivered, whichever is greater. The scaling-up of requirements from 30 per cent to 50 per cent is to recognise that it may be difficult for some universities to meet this criterion without appropriate lead time to build capacity. It is a worthwhile endeavour for our universities to be working towards undertaking research across at least half of their operations to further nourish the scholarly university environment and assist in maintaining the international reputation of Australian universities as being places of both teaching and research. While ideally one would expect universities to conduct world class research in the all fields of education in which they offer Doctoral degrees, the reality is that some institutions will offer Doctoral degrees in disciplines where they are continuing to build research capacity. The PCS therefore needs to offer some flexibility to allow for such growth.

New entrants to the 'Australian University' category, now and in the future, would initially be required to undertake world standard research in at least three, or at least 30 per cent of the broad fields of education where courses are delivered, whichever is greater. Research requirements for these providers will be scaled up to at least three, or at least 50 per cent, of the broad fields of education where courses are delivered, whichever is greater, after ten years of registration in the 'Australian University' category.

Measurement of Research Quality

To be recognised, research should lead to the creation of new knowledge and original creative endeavour. The revised criteria set out in [Appendix D](#) provide TEQSA with the capacity to measure quality and quantity of research against a variety of measures that they deem acceptable. These may include benchmarking, peer review, and citation analysis. Benchmarking of providers in relation to research provides a useful tool for new entrants to the university sector; it enables providers to look to universities with a similar scale, scope, and fields of education as a model on which to build research capacity. This flexibility also allows TEQSA to account for any challenges associated with using established measurement tools, such as ERA.

⁸⁷ Tertiary Education Quality and Standards Agency (TEQSA) submission to the PCS Review. (2018). p.16. Retrieved from: <https://submissions.education.gov.au/Forms/HEPCS/Documents/Tertiary-Education-Quality-and-Standards-Agency.pdf>.

The terminology of 'world standard' is familiar to the sector for its current use in ERA assessments (referring to research rated a '3' or above on '1-5' rating scale) and is broad enough that it can be used by TEQSA based on different sources if need be.

Other Considerations

The recommended threshold for both quality and quantity of research may require some Australian universities to increase their research performance and output, or to specialise in their areas of strength. Analysis undertaken as part of this Review indicates that increased research requirements are likely to affect only a small number of universities with the proposed scaling-up of requirements. Those universities that find themselves below the recommended minimum benchmarks would need to work with TEQSA on an appropriate strategy to ensure successful re-registration as an 'Australian University'. The proposed minimum benchmarks are reasonable, and desirable, if Australia is to maintain the high standards and expectations of its universities and uphold the cachet associated with the protected 'university' title.

Recommendation 5

Along with teaching, the undertaking of research is, and should remain, a defining feature of what it means to be a university in Australia; a threshold benchmark of quality and quantity of research should be included in the Higher Education Provider Category Standards. The threshold benchmark for research quality should also be augmented over time.

Access to Research Funding

Some stakeholders argue that the research funding framework is inadequate as it creates perverse incentives for providers to focus on research fields which are more likely to produce higher citations and positive peer review. An analysis of Australia's three ERA rounds to date "have demonstrated very clearly that if a university aspires to increase its overall research standing, including international rankings, then an investment in science related disciplines is more likely to provide a better dividend than investment in the humanities and social science disciplines. This approach may not be in the national interest of preserving breadth and strength in course and subject offerings".⁸⁸

Furthermore, while "the proportional distribution of funding to universities through the research block grant process is relatively constant year to year, it is uneven across the sector, reflecting different levels of research activity in individual institutions".⁸⁹ This means that a small number of providers receive the bulk of Australian Government research funding. Additionally, access to research funding presents difficulties for those providers aspiring to become an 'Australian University' as research block grants are largely restricted to existing universities. Without Government research funding, it may be very challenging for institutions to build a research profile strong enough for entry to the 'Australian University' category (see [Section 2.1.1](#)).

⁸⁸ Larkins, F. (2019). *Anomalies in the Research Excellence ERA Performances of Australian Universities*. University of Melbourne, p.7. Retrieved from: https://melbourne-cshe.unimelb.edu.au/_data/assets/pdf_file/0009/3078099/FP-LARKINS_University-Performances-ERA-2018-12.pdf.

⁸⁹ Pettigrew, A. (2018). *The Profile of Research Excellence in Australia's Universities – The Missing Piece in the Policy Puzzle*. LH Martin Institute for Tertiary Education Leadership and Management, p.2. Retrieved from the University of Sydney submission to the PCS Review (2019): <https://submissions.education.gov.au/Forms/HEPCS/Documents/The-University-of-Sydney.pdf>.

Fields of Research/Fields of Study

Currently, and in the proposed criteria set out at [Appendix D](#), TEQSA must assess that a provider undertakes research in a given number of fields of study (hereby referred to using the more contemporary 'fields of education'). For the purposes of measuring research, the PCS criteria require an interaction between fields of education and fields of research, although this is not explicitly stated in the PCS.

The Australian Standard Classification of Education (ASCED) defines the subject matter of educational activity at various levels. There are 12 broad (2-digit) fields of education, under which fall 71 more specific narrow (4-digit) and 356 detailed (6-digit) fields of education.⁹⁰ The Australian and New Zealand Standard Research Classification (ANZSRC) categorises research activity according to research methodology. There are 22 divisions (2-digit) of research, 157 groups (4-digit) of research and 1238 fields (6-digit) of research.⁹¹ Fields of education and fields of research are used for a range of purposes including defining the scope of activity under the PCS, assessing research outputs through tools such as ERA, and higher education statistical measurement and sharing of statistical data.

For regulatory purposes and quality measurement (such as ERA), providers identify fields of research for their research outputs. These then can be correlated to fall within fields of education for the purposes of the PCS. Some stakeholders indicate that it can be a challenge to correlate fields of research and fields of education as there are a number of fields of research which, at the 4- or 6-digit levels, may fall under multiple fields of education. This potential concern is recognised; however TEQSA has the flexibility to examine particular instances on a case-by-case basis.

Table 2.1 is provided as a demonstration of how fields of research and education may correlate at the 2-digit level. Correlation between the classifications is imperfect, but acceptable at the broadest classification level. For example, the field of research 'technology' (denoted with an * in the table) is placed within two broad fields of education as there is a distinct split at the 4-digit level which cannot be easily incorporated under one field of education. In this case, and others that may exist, TEQSA will make a judgement on a case-by-case basis to determine the appropriate correlation.

⁹⁰ Australian Bureau of Statistics. (2001). *Australian Standard Classification of Education*. Retrieved from: <https://www.abs.gov.au/ausstats/abs@.nsf/Latestproducts/1272.0Contents12001?opendocument&tabname=Summary&prodno=1272.0&issue=2001&num=&view>.

⁹¹ Australian Bureau of Statistics. (2008). *Australian and New Zealand Standard Research Classification*. Retrieved from: <https://www.abs.gov.au/ausstats/abs@.nsf/Products/1297.0~2008~Main+Features~Chapter+3.Fields+of+Research?OpenDocument>.

Table 2.1: Interaction between ASCED Fields of Education and ANZSRC Divisions of Research

ASCED Fields of Education (2-digit)	ANZSRC Divisions of Research (2-digit)
Natural and Physical Sciences	Mathematical Sciences Physical Sciences Chemical Sciences Earth Sciences Biological Sciences Agriculture and Veterinary Sciences Technology*
Information Technology	Information and Computing Sciences Technology*
Engineering and Related Technologies	Engineering
Architecture and Building	Built Environment and Design
Agriculture, Environmental, and Related Studies	Environmental Sciences
Health	Medical and Health Sciences
Education	Education
Management and Commerce	Economics Commerce, Management Tourism and Services
Society and Culture	History and Archaeology Philosophy and Religious Studies Law and Legal Studies Studies in Human Society Psychology and Cognitive Sciences Language Communication and Culture
Creative Arts	Studies in Creative Arts and Writing
Food, Hospitality, and Personal Services	
Mixed Field Programs	

2.4.4 Scholarship

Scholarship is a fundamental component of higher education. There are many forms in which scholarship can take place, including the scholarship of discovery of new knowledge, integration, application, and teaching.⁹² TEQSA outlines that scholarship, in relation to the Threshold Standards, means “those activities concerned with gaining new or improved understanding, appreciation and insights into a field of knowledge, and engaging with and keeping up to date with advances in the field”.⁹³

Some stakeholders argue that scholarship is of more importance to teaching quality than research, and that the PCS should require the existence and necessity of synergies both between scholarship and teaching, and teaching and research. Such stakeholders call for the scholarship requirements to be raised in all categories under the PCS. However, some also suggest that the scholarship requirements in the PCS are repetitive in the context of the wider Threshold Standards and should be removed from the PCS to avoid duplication.

This Review is of the view that it is vital to set out scholarship requirements in the PCS so that “as a minimum, all teaching and learning in higher education is built on a foundation of advanced knowledge and inquiry, that all academic staff are active in scholarship that informs their teaching, and that supervisors of research students are active in research”.⁹⁴

⁹² Boyer, E. (1990). *Scholarship Reconsidered: Priorities of the Professoriate*. Carnegie Foundation. p.16. Retrieved from: <http://www.hadinur.com/paper/BoyerScholarshipReconsidered.pdf>.

⁹³ Tertiary Education Quality and Standards Agency (TEQSA). (2018). *Guidance Note: Scholarship*. p.1. Retrieved from: <https://www.teasa.gov.au/latest-news/publications/guidance-note-scholarship>.

⁹⁴ *ibid.* p.3.

Engagement in scholarship can be viewed at the level of individual activity (for example, as part of an individual's personal professional development, teaching or research) or across a provider as a whole (for example, policy frameworks, resource allocation or staff development).⁹⁵ Evidence of scholarly output may include publication of literature reviews or conference presentations, leadership of advanced professional development activities, or undertaking advanced specialised practice.⁹⁶

The difference between scholarship requirements in the current 'Higher Education Provider' category and university categories rests on one delineating word – that is, "sustained" scholarship.⁹⁷ TEQSA has indicated that regulating on the basis of one differentiating word is difficult, and that there is a lack of clarity in the current PCS as to what 'sustained' means.

These concerns have been considered in the development of scholarship criteria in the revised PCS (see [Appendix D](#)). Specifically, providers in the 'Institute of Higher Education' category will be required to be "active in scholarship that informs their teaching, supported by the provider", while the criteria for the 'National Institute of Higher Education' and the university categories will require providers to:

demonstrate systematic support for scholarship and demonstrate scholarly activities and outcomes that inform teaching, learning, and professional practice and make a contribution to the advancement and/or dissemination of knowledge;

TEQSA acknowledges that scholarship may take many different forms within and amongst different providers. Therefore, TEQSA will continue to work with providers to ensure scholarship activities are to the standard expected of them within their categories and contexts.

2.4.5 Student Experience

Student experience⁹⁸ was consistently raised in the submission and consultation process and centred around two main themes:

- the varying activity and quality of a single provider across different campuses; and
- the desire to see student experience more clearly articulated in the PCS to reflect strengths across the sector and introduce additional category delineating factors beyond research.

Many higher education providers in Australia offer courses at many different campuses. For example, a large university may host a smaller 'city building block' campus in the same city or another, while a smaller regional university may set up a small office block campus in a metropolitan city centre. These smaller campuses may be wholly owned and operated by the university or, in some cases, by a third party. The third party, who may or may not be a registered higher education provider in its own right, delivers the teaching on behalf of the higher education provider. In these cases, it is the responsibility of, and an onus upon, the registered provider to ensure that the quality of educational experience and outcomes offered by the third party provider matches that offered by the registered provider. Appropriately, TEQSA examines third party arrangements as part of assessing whether a provider meets the requirements of the Threshold Standards.

⁹⁵ Tertiary Education Quality and Standards Agency (TEQSA). (2018). *Guidance Note: Scholarship*. p.1. Retrieved from: <https://www.teqsa.gov.au/latest-news/publications/guidance-note-scholarship>.

⁹⁶ *ibid.* p.6.

⁹⁷ *Higher Education Standards Framework 2015*. Part B1.3.5. Retrieved from: https://www.legislation.gov.au/Details/F2015L01639/Html/Text#_Toc428368878.

⁹⁸ The Quality Indicators for Learning and Teaching (QILT) Student Experience Survey measures five key aspects of the student experience: skills development, learner engagement, teaching quality, student support, and learning resources.

Some stakeholders believe there is no clear basis for allowing a so-called 'city building block' campus to style itself as a university due to the differences in offerings. Others are of the opinion that while such campuses may offer a different experience, the students do still have access to equivalent quality teaching and experience as at a main campus. It is important to recognise that the Threshold Standards "cover all modes of participation and delivery, sites of delivery and all categories of students".⁹⁹ This implies that, from a regulatory point of view, students should have equivalent experiences no matter which campus of a single provider they attend.

Many stakeholders would like to see more stringent links in the PCS between student experience and the quality of teaching and learning. Some providers in the 'Higher Education Provider' category pointed to various other elements of higher education that comprise a quality student experience including small cohorts, personalised service, and quality infrastructure that are not currently incorporated in the PCS. Quality Indicators for Learning and Teaching (QILT) Student Experience Survey results suggest that providers in the 'Higher Education Provider' category often compare favourably with universities.¹⁰⁰ Obviously, though, QILT captures student experiences of teaching rather than research.

While acknowledging the concerns raised by some stakeholders, this Review does not recommend any major changes to the way in which student experience is articulated in the PCS. This is largely because student experience is a key focus of the broader Threshold Standards, criteria which all registered higher education providers must meet. In 2015 the Threshold Standards were revised and "structured to align with the student experience or 'student life cycle' i.e. as they progress from prospective students through to the award of a qualification".¹⁰¹ Specifically, Domain 1: Student Participation and Attainment focusses on the educational experience for students.

2.4.6 Industry Engagement, Civic Leadership, and Community Engagement

"Strengthened relations between universities and industry would enable effective life-long learning informed by the latest research and industry practice".

Australian Technology Network submission to the PCS Review 2019, p.2

Stakeholders are supportive of placing greater emphasis on industry engagement in the PCS to ensure providers are actively and effectively communicating with industry, creating value through high impact research, and producing the graduates that Australia needs for the future. A recent study undertaken by Ernst and Young shows that 83 per cent of undergraduate students expressed interest in participating in an integrated employment and education offering had one been available.¹⁰²

⁹⁹ Tertiary Education Quality and Standards Agency (TEQSA). (2017). *Contextual Overview of the HES Framework 2015*. p.10. Retrieved from: <https://www.teqsa.gov.au/contextual-overview-hes-framework-2015>.

¹⁰⁰ Quality Indicators for Learning and Teaching (QILT). (2019). *2018 Student Experience Survey: National Report*. p.11. Retrieved from: https://www.qilt.edu.au/docs/default-source/ses/ses2018/2018-ses-national-report75e58791b1e86477b58ff00006709da.pdf?sfvrsn=d733e33c_4.

¹⁰¹ Tertiary Education Quality and Standards Agency (TEQSA). (2017). *Contextual Overview of the HES Framework 2015*. p.6. Retrieved from: <https://www.teqsa.gov.au/contextual-overview-hes-framework-2015>.

¹⁰² Ernst and Young. (2018). *Can the universities of today lead learning for tomorrow? The University of the Future*. p.8. Retrieved from: <https://go.ey.com/2Z4Xxah>.

Although there are examples of strong industry-university engagements in Australia,¹⁰³ industry-university collaboration is not one of Australia's obvious strengths. However, "closer industry-university collaboration can be achieved without compromising the independence of universities or the important role they play in Australian society".¹⁰⁴ The intersection between higher education and industry should be encouraged to grow in the future, and it is important that such a close relationship be reflected in the PCS, in the university categories and the proposed 'National Institute of Higher Education' category.

"The key characteristic of a university is its leadership role in Australian higher education. Leadership must be demonstrated [...] so that the development of knowledge and its transmission to the community are fundamental to the ethos of our leading higher education institutions".

University of Technology, Sydney submission to the PCS Review 2019, p.2

Common practice and expectation strongly suggest that universities currently fulfil a civic leadership role, although this expectation is not explicitly codified in the PCS. Some stakeholders believe that the PCS should be adjusted to incorporate civic leadership requirements to be an essential element of what it means to be a university in Australia. Civic leadership involves leading the facilitation and adoption of positive contributions to, and change, within society. It includes understanding the needs and priorities of local communities, recognising the long-term benefits to society of university activities, including research and scholarship, and contributing to social transformation and development.¹⁰⁵ There are numerous examples of innovative civic leadership in Australian universities. One example is University of New England's SMART Farms initiative which showcases the latest technologies aimed at improving farming productivity, environmental sustainability and safety.¹⁰⁶ Another example is MultiLit, a practical reading program that has helped thousands of students struggling to read, based on original work from Macquarie University.¹⁰⁷

"The title of 'university' should carry with it the sense of a long-term and appropriately resourced commitment and a sense of public responsibility to reduce social inequality, advance the university's communities, progress environmental sustainability and, in other ways, promote the common good".

University of Divinity submission to the PCS Review 2019, p.1

¹⁰³ These include, for example, a collaboration between RMIT University and the Bureau of Meteorology to improve the accuracy of weather forecasting and a collaboration between the University of South Australia and industry partner SMR Automotive to provide the world's first light-weight, plastic automotive mirror.

¹⁰⁴ Australian Technology Network of Universities and AiGroup. (2015). *Innovate and Prosper: Ensuring Australia's Future Competitiveness through University-Industry Collaboration*. p.2. Retrieved from: <https://www.atn.edu.au/siteassets/publications/atninnovateprosper.pdf>.

¹⁰⁵ The UPP Foundation Civic University Commission. (2019). *Truly Civic: Strengthening the Connection between Universities and their Places*. p.36. Retrieved from: <https://upp-foundation.org/wp-content/uploads/2019/02/Civic-University-Commission-Final-Report.pdf>.

¹⁰⁶ University of New England. (2019). *SMART Farms*. Retrieved from: <https://www.une.edu.au/research/research-centres-institutes/smart-farm>.

¹⁰⁷ MultiLit. (2019). *About*. Retrieved from: <https://multilit.com/about/>.

Although PCS currently require universities to demonstrate engagement with local and regional communities and show a commitment to social responsibility, stakeholders argue these requirements should be bolstered to ensure that, in addition to teaching and research, community engagement is a core feature of universities in Australia. Australian universities already have strong community engagement strategies, collaborating with their communities and encouraging students “to make meaningful contributions beyond attending university classes and completing assignments”.¹⁰⁸ This includes a range of activities such as pro-bono legal community or environmental protection work, sponsoring local events, hosting public lectures or exhibits, and encouraging engagement between international students and local communities. Bolstered requirements relating to community engagement are included in the university categories in [Appendix D](#).

It is not the intention that the recommendations of this Review create a new industry of compliance. Requirements around industry engagement, civic leadership, and community engagement present difficulty in measurement and will require a degree of flexibility by the regulator. However, clarifying these requirements in the PCS assists the consumer in understanding what is expected of different types of providers. Therefore this Review encourages TEQSA to draw on much of the existing material providers are already reporting on in this space, rather than creating a new compliance regime. Notwithstanding this, all universities – no matter their individual mission or location – should be able to demonstrate their commitment to undertake these activities in strong and meaningful ways.

Recommendation 6

Requirements related to industry engagement, civic leadership, and community engagement should be introduced or bolstered in the university categories of the Higher Education Provider Category Standards. Industry engagement requirements should also be part of the proposed ‘National Institute of Higher Education’ category.

2.5 ‘Greenfield’ Universities

The PCS framework currently contains no provision for ‘greenfield’ universities, that is, for a newly established entity which has not been registered by TEQSA as a higher education provider and seeks to apply directly for university status. The National Protocols, which preceded the Threshold Standards, did include specific provisions for ‘greenfield’ universities.¹⁰⁹ These provisions were not carried over with the introduction of the Threshold Standards in 2011. At the time, the ‘Australian University College’ category was intended to be a transitional category, giving a period of grace of five years before applicants were required to meet all the ‘Australian University’ category requirements. Given the limited utility of the current ‘Australian University College’ category (see [Section 2.1.1](#)) the transitional purpose of this category has had very limited success. Indeed, there have been no ‘greenfield’ university applications since the establishment of TEQSA.¹¹⁰

¹⁰⁸ Australian Catholic University submission to the PCS Review. (2019). p.5. Retrieved from: <https://submissions.education.gov.au/Forms/HEPCS/Documents/Australian-Catholic-University.pdf>.

¹⁰⁹ Ministerial Council on Education, Employment, Training and Youth Affairs. (2006). *National Protocols for Higher Education Approval Processes*. Clauses 8.11 – 8.16. Retrieved from: http://www.curriculum.edu.au/verve/_resources/RevisedNationalProtocols20081.pdf.

¹¹⁰ The most recent ‘greenfield’ university is Torrens University Australia. Torrens was registered as a University by South Australia prior to the commencement of the TEQSA Act 2011. Torrens was registered as an ‘Australian University’ in accordance with the *Tertiary Education Quality Standards Agency (Consequential Amendments and Transitional Provisions) Act 2011*.

There are mixed views on the necessity to reinstate provisions for 'greenfield' universities in the PCS. The main challenge for TEQSA is that there are provisions in the *TEQSA Act 2011* which would prevent TEQSA registering a 'greenfield' university. Furthermore, even if this legal barrier was removed, the current 'Australian University' requirements are expressed as features of a provider that is already operating with a track record of performance. This can make it difficult for TEQSA to accurately assess whether or not a prospective provider can meet the various and rigorous requirements of the 'Australian University' category before commencing operations. This would require the expertise of TEQSA as the regulator to assess the capacity of that institution to meet the standards from a reasonable risk-based approach.

That there have been no applications of this kind since the establishment of TEQSA is not, in and of itself, a reason to dismiss the TEQSA's capability to assess a possible future application. There are many other factors which may assist or preclude 'greenfield' applications. These could include the availability of support from the relevant State or Territory government or access to adequate funds.

The Australian Government should consider how the requirements of the Threshold Standards and the *TEQSA Act 2011* would interact with a 'greenfield' university. This would require amendment to the *TEQSA Act 2011* which, at present, permits TEQSA to grant the application for registration of a provider only where TEQSA is satisfied that the applicant meets the Threshold Standards, including the PCS; a mere intention to meet the Threshold Standards would, on the face of it, be insufficient for TEQSA to approve such an application.

In catering for 'greenfield' applicants, Government will need to ensure TEQSA would be able to consider in its assessment whether that applicant could meet appropriate quality thresholds. These include the likelihood that the prospective provider would possess the resources, processes, and capacity to be able to meet the 'Australian University' category upon its creation or shortly thereafter.

Provision for 'greenfield' universities has been reflected in the *Recommended Categorisation and Criteria for Higher Education Providers* (see [Appendix D](#)).

Recommendation 7

To ensure Australia's higher education sector is positioned to support innovation, population growth, and demand for higher education in the future, the *Tertiary Education Quality and Standards Agency Act 2011* should be amended to allow for 'greenfield' universities.

2.6 Self-Accrediting Authority Criteria

Under Part B2 of the Threshold Standards, registration of a higher education provider in the 'Australian University' category confers self-accrediting authority on the provider. In other categories, higher education providers may seek approval from TEQSA for authority to self-accredit some or all of their courses of study. The revised criteria set out in [Appendix D](#) clearly state that the types of self-accrediting authority that can be authorised by TEQSA are:

- Unlimited: self-accrediting authority for all higher education courses of study that the provider delivers, or may deliver, in any AQF level or field of education; and
- Limited: self-accrediting authority for higher education courses that the provider delivers, or may deliver, in a specific combination of AQF levels and/or fields of education.

There are currently 42 universities, one university college, and one higher education provider with unlimited self-accrediting authority, and one university of specialisation and ten higher education providers with limited self-accrediting authority (see [Appendix E](#)). Providers who seek self-accrediting authority do so for various reasons. These include the recognition of their maturity, quality, and the ability to bring courses to market without relying on TEQSA's course accreditation process. Self-accrediting authority can lend itself to faster, more flexible, and more innovative course construction to better keep pace with industry needs.

The authority to self-accredit is a significant privilege bestowed on a provider; achieving self-accrediting authority is a clear demonstration that the provider has established a track record of performance, transparency, and compliance with TEQSA, and has a particular level of institutional maturity and quality in governance and teaching.

As such, the criteria for self-accrediting authority need to be sufficiently robust to ensure that a provider has mature and effective internal course design and approval processes to support self-accreditation. Providers that self-accredit their courses of study are accountable for:

- interpreting the requirements of the Threshold Standards;
- judging whether the Threshold Standards will be appropriately applied and met throughout the development, approval, and delivery of a course of study; and
- ensuring that compliance across all the Threshold Standards is sustained throughout their higher education operations.¹¹¹

The majority of stakeholders are satisfied with the rigour and robustness of the criteria to protect the high standing of providers with self-accrediting authority. Since TEQSA began operation in 2012, the number of providers in the 'Higher Education Provider' category with some form of self-accrediting authority has risen from three to 11, demonstrating that the criteria are tough, but attainable.¹¹²

However, the wording of the current criteria for self-accrediting authority is overly complex. The earlier review of the Threshold Standards (see [Section 1.1.1](#)) introduced three subsections in Part B2. These included detailed descriptions of the types of self-accrediting authority that may be sought, and different subsections for limited and unlimited self-accrediting authority, although the sections were not explicitly named as such. The revised criteria set out in [Appendix D](#) have addressed this issue by consolidating Part B2 into one section. This emphasises that self-accrediting authority is primarily about the ability of providers to develop courses consistently over a number of cycles to standards acceptable to TEQSA with no conditions imposed on any courses.

In addition, the current criteria for unlimited self-accrediting authority can present difficulties from a regulatory perspective, to the extent that the criteria are designed in such a way that TEQSA is required to assess a provider's capacity to undertake future events, rather than demonstrating a history of capability. Specifically, the criteria require demonstration of:

- capability to plan, establish and accredit courses in new broad fields;
- capacity for competent academic governance oversight and scrutiny of the accreditation of courses in new broad fields; and
- breadth and depth of academic leadership, scholarship and expertise to guide entry into and sustainable delivery in new broad fields.

¹¹¹ Tertiary Education Quality and Standards Agency (TEQSA). (2019). *Applying for Self-Accrediting Authority*. Retrieved from: <https://www.teqsa.gov.au/applying-self-accreditation>.

¹¹² Information provided by TEQSA. (2019).

No provider has applied to TEQSA for unlimited self-accrediting authority. This suggests that there may be no need for this option in the PCS. The issue has been addressed in the revised criteria as set out in [Appendix D](#) and is further discussed in [Section 3.2.6](#).

Recommendation 8

The criteria for seeking self-accrediting authority should be amended to simply and clearly articulate the types of self-accrediting authority (limited and unlimited) that can be authorised by the Tertiary Education Quality and Standards Agency and the requirements to be demonstrated by providers seeking self-accreditation status.

2.7 Awareness and Transparency of the PCS

The PCS and their principal functions are reasonably well known throughout the higher education sector. However, the broader community (including current and prospective students) is largely unaware of the PCS. One of the purposes of the PCS (among others set out in Chapter 1) is to inform students and other interested parties of the characteristics and expectations of different higher education providers in Australia. If this is to continue to be a purpose of the PCS, as it should, then it is vital that the PCS are more accessible and transparent than they are at present in order that consumers, namely prospective students, are informed about their post-school education choices.

To respond to these issues and promote awareness of the PCS, the Review proposes that there should be greater transparency of the PCS, including the expected requirements of different provider types. This section sets out three possible, but not mutually exclusive, methods by which to achieve this goal: through the TEQSA National Register, relevant public materials and a comprehensive communications strategy.

2.7.1 TEQSA National Register

The TEQSA National Register of Higher Education Providers (the Register) is “the authoritative source of information on the status of registered higher education providers in Australia”.¹¹³ TEQSA is required to maintain the Register in accordance with the Register Guidelines under Section 198 of the *TEQSA Act 2011*. Section 198 provides that “subsection (3) does not prevent TEQSA from entering other details on the Register in respect of a registered higher education provider”. Therefore any changes made to the Register would be well within the legislative remit of TEQSA.

Users of the Register are currently able to search the Register by provider or course name and filter by provider category, self-accrediting authority, provider and course status, and courses in languages other than English. Information available on each provider includes contact information, trading details, Australian Business Number (ABN), Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) number, TEQSA Provider ID, registration information (including provider category and self-accrediting authority), offered courses, and any pertinent decisions or conditions relating to the provider. There are also links to the CRICOS and QILT websites for each provider.

¹¹³ Tertiary Education Quality and Standards Agency (TEQSA). (2019). *National Register Summary Table*. Retrieved 03/09/2019 from: www.teqsa.gov.au/national-register.

"The TEQSA National Register provides fairly generic information [...] it should be fuller and more illustrative to provide a better sense of each registered provider's scope of operations. [...] The Register should then set out for students and interested parties the basis of each provider's registration so that good, clear, information is available".

Innovative Research Universities submission to the PCS Review 2019, p.5

The Register already has a wide reach, with more than 66,000 page views from July 2018 to June 2019.¹¹⁴ Recognising the current strength of the Register, the Review recommends that additional features could be added to it. Additional information to be considered may include detailed descriptions of the criteria and expectations of each provider category, student population (i.e. EFTSL¹¹⁵ number), status (public, private not-for-profit, private for profit), third-party teaching arrangements, sector (higher education only or dual sector) and sub-category information (for example, pathway provider, TAFE provider). It may also be possible to include a function to search for similar institutions, for example, by size, location, or provider category.

2.7.2 TEQSA Provider ID and Provider Category

All TEQSA registered higher education providers are allocated a TEQSA Provider ID to help identify the provider in TEQSA's records and enable users to search for a particular provider on the Register. To enhance visibility of the PCS and direct prospective students and other interested stakeholders to the Register, the Review proposes that providers' TEQSA ID and provider category are more visible on relevant public material.

There is precedent for such a requirement; under CRICOS legislation, providers are required to "include its CRICOS registered name and registration number in any written or online material that it disseminates or makes publicly available".¹¹⁶ Best practice may be for providers to use interactive hyperlinks for their TEQSA ID or provider category from their home pages to the Register.¹¹⁷ Currently, around 90 per cent of all Australian higher education providers include at least one identity number (such as an ABN, an RTO number, CRICOS number, or TEQSA Provider ID) on their website home pages.¹¹⁸ As such, this requirement is not likely to be arduous for higher education providers.

2.7.3 Communications Strategy

To build understanding and recognition of the different categories of higher education providers in Australia, a concerted communications strategy should be developed and actioned, taking into consideration national and international stakeholders.

¹¹⁴ Information provided by TEQSA. (2019).

¹¹⁵ EFTSL is defined in HESA as an equivalent full time student load. It is a measure of the study load, for a year, of a student undertaking a course of study on a full time basis, where the student undertakes a standard program of studies.

¹¹⁶ Australian Government. (2017). *National Code of Practice for Providers of Education and Training to Overseas Students 2018 (National Code 2018)*. Standard 1.4. Retrieved from: <https://www.legislation.gov.au/Details/F2017L01182>.

¹¹⁷ See, for example, Curtin University PRV12158 (www.curtin.edu.au).

¹¹⁸ Information sourced from a Department of Education desktop audit of registered higher education providers listed on the Register in May 2019.

It is recommended that the Australian Government Department of Education work with Austrade (the responsible department for international marketing and promotion of Australian education and training) and TEQSA, as well as other relevant groups, in the development of this communications strategy to ensure most effective and targeted reach. Importantly, schools and careers advisers should be included in any targeted communications strategy so that students, as consumers of the PCS, are informed about their post-school options.

For example, Australian Government higher education websites, particularly those targeted at students, could be updated to reflect and share revisions to the PCS proposed in this Review. In doing this, the interconnectivity of such websites could also be enhanced to enable students to more effectively understand the ways in which Government websites interact. It would also support students to easily access information about their post-school options which would include clearer links between websites such as TEQSA, CRICOS, QILT, ERA, and Course Seeker.

An effective communications strategy is particularly important in building transparency and awareness of the different categories of higher education providers in Australia under the PCS, and building the profile and recognition of institutions within those categories. This will be particularly the case for the proposed 'National Institute of Higher Education' category.

Recommendation 9

The essential purpose of regulating the nomenclature of institutions via the Higher Education Provider Category Standards is consumer protection. There should be, therefore, greater transparency and awareness-raising of the Higher Education Provider Category Standards, including the requirements expected of providers by different category type. This will be for the benefit of potential students, industry, and employers, both domestic and international.

Item	Related Action
The National Register of Higher Education Providers	To enable consumers to be better informed of the requirements expected of providers registered under different categories, the Tertiary Education Quality and Standards Agency should provide more descriptive information on the National Register of Higher Education Providers.
Tertiary Education Quality and Standards Agency Provider ID and provider category	To assist in transparency for consumers, all registered higher education providers should feature their Tertiary Education Quality and Standards Agency Provider ID and provider category on relevant public material.
Communications strategy	To build understanding and recognition of the different categories of higher education providers in Australia, a concerted communications strategy should be actioned with national and international audiences in mind.

Chapter 3

A Revised PCS Model

The previous chapter outlined a number of key issues with the current PCS which were identified through public submissions and consultations, and proposed recommendations seeking to address these issues. Findings included the underutilisation or unobtainability of some categories, a lack of differentiation in the current 'Higher Education Provider' category, nomenclature across the categories, the conceptualisation of Australian universities as places of both teaching and research, and limited community awareness of the PCS. Technical issues with the PCS were also identified including a lack of definition for quality and quantity of research and overly complex self-accrediting authority criteria.

This chapter explores the detail of a revised PCS model that is fit for purpose and fit for the future to meet the needs of students, the regulator, the broader education sector, and the wider community. The chapter provides an overview of a revised PCS model, key changes to the criteria, and a discussion of how the revised PCS will best serve different stakeholders.

3.1 Revised Categories

The proposed revisions to the PCS are available in [Appendix D](#). The revisions have been developed in line with the recommendations presented in Chapter 2 and take into consideration the views put forward by stakeholders in submissions and consultations. In addition the recommendations set out in Chapter 2, a number of technical and minor changes to the criteria have been made. Although not warranting discrete recommendations, these changes are intended to aid the simplification, transparency, and clarity of the PCS.

Recommendation 10

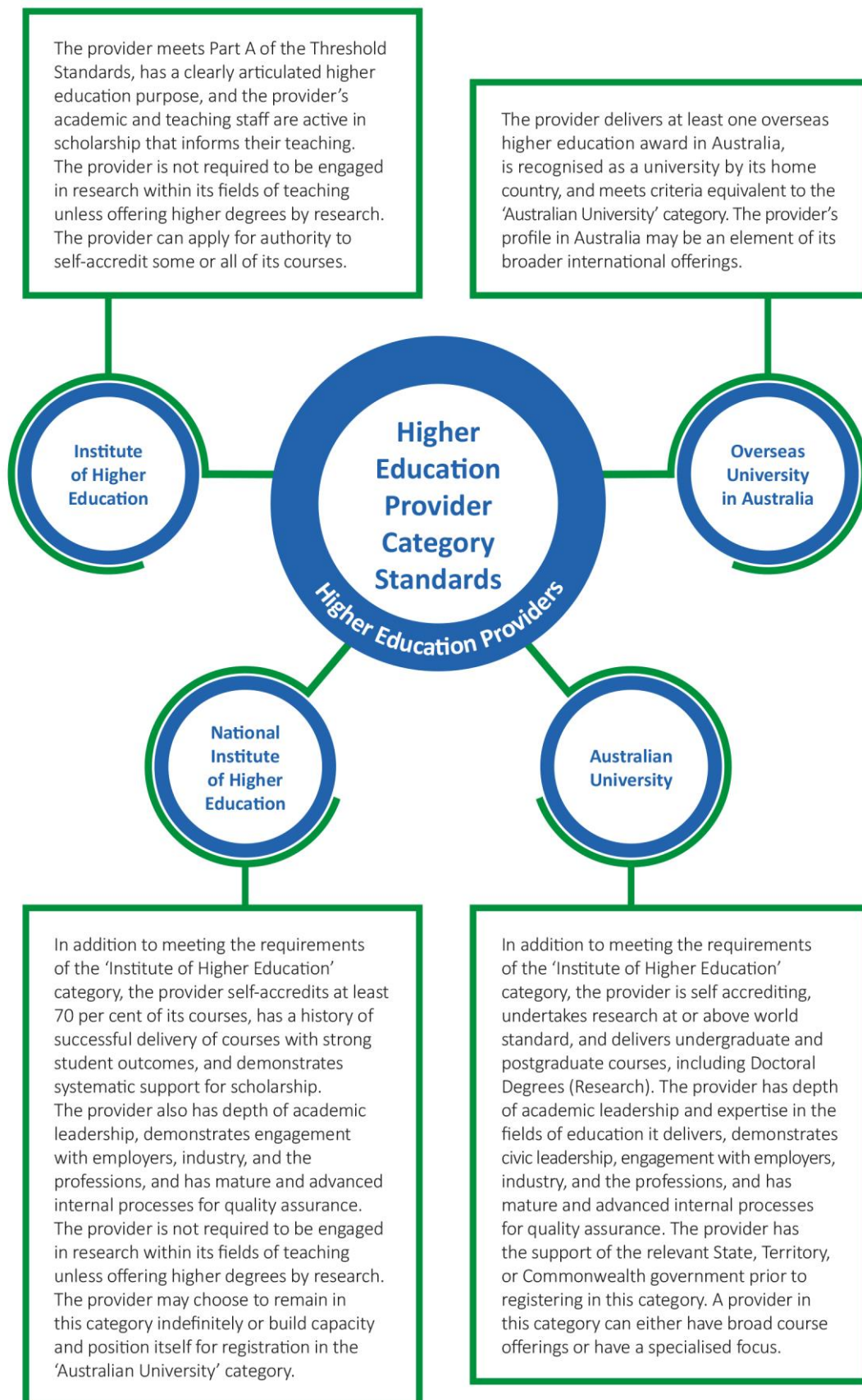
The recommended changes to Part B of the *Higher Education Standards Framework (Threshold Standards) 2015* (as set out in [Appendix D](#)) should be referred to the Higher Education Standards Panel for deliberation. The HESP will then advise the Minister for Education on further required actions.

The proposed revised PCS will consist of four categories:

- Institute of Higher Education;
- National Institute of Higher Education;
- Australian University; and
- Overseas University in Australia.

The rationalisation of the current six categories to four categories – that is, two categories for universities and two categories for other higher education providers – aims to simplify and rebalance the PCS. Justification for the removal of some categories, and the modification or creation of others, can be found in Chapter 2. Diversity in the higher education sector is not reliant on numbers of categories. The PCS do not, and should not, prevent institutions from differentiating themselves and their missions as they seek to serve their different communities. This must continue to be fostered and encouraged. Figure 3.1 presents descriptions of the revised PCS categories.

Figure 3.1: Overview of Proposed PCS Categories



The naming of the revised categories was an important practical consideration for this Review. Nomenclature is significant to project status, recognition, and the value of each category, both domestically and internationally, across a range of stakeholder groups. As detailed in Chapter 2, the title 'university' resonates across the sector and beyond (see [Section 2.4.1](#)). A detailed discussion of the issues surrounding the naming of the 'Institute of Higher Education' and 'National Institute of Higher Education' is also outlined in Chapter 2 (see Sections [2.2.3](#) and [2.2.5](#) respectively).

3.2 Key Changes

This section summarises the major revisions to each provider category. None of the proposed revisions to the PCS will prevent institutions from having diverse missions in line with the communities and student populations they seek to serve. The PCS set out threshold requirements within a category; however, this does not inhibit scope or mission.

3.2.1 Criteria for Higher Education Provider Categories – Preamble

A key proposed change to the introductory paragraphs of Part B of the Threshold Standards includes referencing the objects of the *TEQSA Act 2011* and TEQSA's regulatory principles. This emphasises the importance of the legislative principles that TEQSA takes into consideration when making regulatory decisions.

In line with Recommendation 9, the revised preamble includes that a provider's registration category should be displayed on the TEQSA National Register and that all registered higher education providers should feature their TEQSA Provider ID and provider category on relevant public facing materials.

3.2.2 'Institute of Higher Education' Category

(Revision of the current 'Higher Education Provider' category)

In line with Recommendation 2, the existing 'Higher Education Provider' Category – the category in which all higher education providers are registered unless they meet additional criteria – has been renamed 'Institute of Higher Education' to avoid confusion with the broad definition of 'higher education provider' in the *TEQSA Act 2011*.

Providers in this category will be required to engage academic and teaching staff who are active in scholarship that informs their teaching, supported by the provider.

It is proposed that the current criteria for this category in relation to teaching and learning, and freedom of intellectual inquiry be removed, as these requirements are already addressed in Part A of the Threshold Standards.

3.2.3 'National Institute of Higher Education' Category

(New category)

The proposed 'National Institute of Higher Education' category has been developed to help differentiate high-performing self-accrediting higher education providers. The category will serve as an aspirational or destination category for such high quality providers. Additionally, the category will enable providers to build capacity and subsequently apply to the 'Australian University' category, if that is their aspiration. A key requirement of the category is that providers will have self-accrediting authority for at least 70 per cent of their courses. The rationale for the introduction of this category, based on self-accrediting status, is provided in [Section 2.2.5](#).

The primary aim of the category is to recognise the achievement of high quality providers. As such, additional criteria beyond the achievement of self-accrediting authority are proposed. The additional criteria relate to:

- strong student outcomes;
- mature processes for course design, quality assurance, and maintenance of academic integrity;
- systematic support for scholarship;
- depth of academic leadership;
- implementing good practices for teaching and learning that can be shared with the sector; and
- genuine engagement with employers, industry, and the professions to inform teaching and learning.

All registered providers, both those seeking to enter the category and those currently registered in the category, must demonstrate a mature level of development and a track record of compliance against the criteria.

3.2.4 'Australian University' Category

(Revision and merging of the current 'Australian University' and 'Australian University of Specialisation' categories)

Terminology in this category has been amended from 'broad fields of study' to 'broad fields of education' to be consistent with the Threshold Standards and to be in line with contemporary nomenclature.

This Review recommends merging the current 'Australian University' and 'Australian University of Specialisation' categories (see [Section 2.1.2](#)). Consequently, the revised criteria make provision for universities that have a specialised focus. The introductory paragraphs to this category outline that for universities with a specialised focus, self-accrediting authority will be limited to one or two broad fields of education. For example, a university specialising in health sciences could not offer business or aeronautical engineering without first seeking self-accrediting authority from TEQSA for those new fields. Universities with a specialised focus may wish to eventually expand their offerings to become a comprehensive institution. In such an instance, close consultation with, and authorisation from, TEQSA will be required.

As with the 'National Institute of Higher Education' category, a key addition to this category is that all registered providers, both those seeking to enter the category and those currently registered in the category, must demonstrate a mature level of development and a track record of compliance against the criteria.

In order to simplify the requirements that providers must meet at time of application to enter the category, more detail has been introduced in the category's preamble. Of particular note is the clarification of the volume of self-accrediting authority required. Whereas the current Threshold Standards are somewhat opaque, the proposed revised criteria set out that providers must ensure, at time of application to TEQSA, that 75 per cent of their self-accredited courses have been through at least one cycle of review and improvement by the provider.

The research criteria have been revised to provide more guidance and scope for TEQSA regulation including setting requirements for quality and quantity of research. More information on research requirements is set out in Chapter 2 (see [Section 2.4.3](#)).

As discussed in Chapter 2 (see [Section 2.4.6](#)), the criterion in relation to community engagement has been bolstered to include provision for civic leadership. Additionally, a new criterion has been added to recognise the importance of industry engagement in higher education, particularly in areas such as work-integrated learning and research partnerships.

Criteria around scholarship and quality assurance have been revised for clarity and to provide more guidance to TEQSA for regulation. A new criterion has been added to require five years of successful delivery of courses, supported by evidence of strong student outcomes, taking into account different student cohorts. Student outcomes can be measured against a variety of sources deemed acceptable to TEQSA, such as graduate outcomes, progression rates, and measures of student experience.

3.2.5 'Overseas University in Australia' Category

(Merging of the current 'Overseas University' and 'Overseas University of Specialisation' categories)

This Review recommends merging the current 'Overseas University' and 'Overseas University of Specialisation' categories. The rationale for this recommendation is provided in Chapter 2 (see [Section 2.1.3](#)).

The proposed criteria for the 'Overseas University in Australia' category remain largely similar to the current PCS 'Overseas University' category, apart from accommodating overseas universities with either a comprehensive or specialised focus.

To clarify the scope of providers registered in this category, the introduction to the category states that "the higher education provider delivers at least one overseas higher education award in Australia [and] its profile in Australia may be an element of its broader international offerings".¹¹⁹

3.2.6 Criteria for Seeking Self-Accrediting Authority

The authority to self-accredit is a significant privilege bestowed on a provider. As such the criteria for self-accrediting authority need to be sufficiently robust to ensure that a provider has a demonstrated performance record, and has mature and effective internal course design and approval processes to support self-accreditation.

The current self-accrediting authority criteria are overly complicated (as outlined in [Section 2.6](#)). The proposed revision of the self-accrediting authority criteria simplifies those criteria, while maintaining the quality benchmarks expected for the authority to self-accredit courses of study.

Additionally, the proposed criteria set the following definitions of self-accrediting authority:

- Unlimited: self-accrediting authority for all higher education courses of study that the provider delivers, or may deliver, in any AQF level or field of education; and
- Limited: self-accrediting authority for higher education courses that the provider delivers, or may deliver, in a specific combination of AQF levels and/or fields of education.

¹¹⁹ See criterion B1.4 in [Appendix D](#).

3.3 Benefits of the Revised PCS Framework for Stakeholders

The PCS fulfil a range of roles, including defining the requirements of different types of providers in Australian higher education and safeguarding Australia's high quality higher education sector as part of the regulatory framework. Given the variety of purposes of the PCS, part of this Review's remit is to consider how the revised PCS will benefit stakeholders including students, providers, the regulator, and government. Although implicit throughout this report, this section summarises the major benefits for key stakeholder groups. The key issues raised by this Review, their accompanying recommendations, and the benefits to stakeholders, fall into three broad themes: fit for purpose, lifting cachet and reputation, and brand protection (see [Chapter 2](#)).

For students, the revised and streamlined PCS will seek to improve understanding of different provider types in the higher education sector and encourage further confidence in the high quality of Australian higher education. Specifically, Recommendation 9 which aims to enhance the transparency and awareness of the PCS (see [Section 2.7](#)) seeks to better inform students about the characteristics and expectations of different higher education providers in Australia. This will ensure they are equipped with the knowledge that will enable them to make choices about the higher education that will best suit their purposes and needs.

The revised PCS provide useful and distinct categories for providers to operate within that are best suited to their objectives. The revised PCS aim to lift the cachet of the entire higher education sector, including specifically providing a discrete category for recognising high performing higher education providers that are not universities (see [Section 2.2.5](#)). This revision will help to ensure that the Australian higher education 'brand' is maintained, encouraging international students to undertake higher education in Australia and protecting the quality of providers' reputations and qualifications. Clearer and more transparent PCS criteria will also help providers to understand the expectations of the regulator, thus assisting registration and accreditation processes for both parties.

For the regulator, the revised PCS criteria provide greater clarity and scope in key regulation areas such as research, scholarship, and self-accrediting authority. This will enable TEQSA to continue to fulfil its requirements under the *TEQSA Act 2011*, in particular to protect and enhance Australia's reputation for quality higher education, foster excellence, diversity, and innovation in higher education in Australia, and enhance Australia's international competitiveness in the higher education sector. The revised PCS criteria also provide consistency of terminology and reduce duplication with the broader Threshold Standards.

For Government, the PCS will continue to fulfil the important functions of defining the expectations and characteristics of Australian higher education providers, protect the 'university' title, set requirements for overseas universities to operate in Australia, and ensure domestic and international students continue to have attractive higher education choices in Australia. The revised PCS will also provide Government with greater confidence in the quality and quantity of research in Australia, will allow for clear and direct policy arrangements based on proposed PCS categorisation and, by fostering innovation and competition among Australian higher education providers, will continue to elevate the profile and reputation of Australia's higher education sector domestically and internationally.

3.4 Implementation Considerations

This Review notes that changes to the PCS require due legislative process. Notably the *TEQSA Act 2011* requires a draft of Part B of the Threshold Standards be developed by the HESP. [Appendix D](#) has been provided to assist the HESP with this task. States and Territories are required to be consulted on any changes.

Any change to a regulatory framework should allow ample time to amend practices, build capacity to meet changed requirements and introduce a comprehensive communications strategy. This is similar to the experience of implementing the current Threshold Standards, where providers were given over one year to build capacity to meet new standards. It is therefore recommended that a similar approach be taken to implement a revised PCS.

If Government implements a revised PCS, TEQSA would be able to register a provider in a particular provider category either on its own initiative or on successful application by the provider as set out under Section 38(1) of the *TEQSA Act 2011*. Any change by TEQSA to providers' existing registration in a provider category should be done in consideration of where a provider's activities and missions best correlates to criteria in a revised PCS.

Glossary and Definitions

Term	Definition
Australian Skills Quality Authority (ASQA)	The Australian Skills Quality Authority (ASQA) is the national regulator for Australia's vocational education and training sector. ASQA regulates courses and training providers to ensure nationally-approved quality standards are met.
Australian Qualifications Framework (AQF)	The Australian Qualifications Framework (AQF) is the national policy for regulated qualifications in Australian education and training. It incorporates the qualifications from each education and training sector (higher education, vocational education, and school education) into a single comprehensive national qualifications framework. It provides for national recognition and a consistent understanding of what defines each qualification type.
Civic leadership	Civic leadership involves leading the facilitation and adoption of positive contributions to, and change within, society. It includes understanding the needs and priorities of local communities, recognising the long-term benefits to society of university activities, including research and scholarship, and contributing to social transformation and development.
Commonwealth supported place (CSP)	A Commonwealth supported place (CSP) is a higher education place which is subsidised by the Commonwealth Government through the Commonwealth Grant Scheme (CGS). Previously called a 'HECS' place.
Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS)	The Commonwealth Register of Institutions and Courses for Overseas Students (CRICOS) is the official Australian Government website that provides details of Australian education providers approved to recruit, enrol, and deliver education and training services to overseas students and details of the courses that they deliver. The database can be searched by course or provider name/number and can be accessed at http://cricos.education.gov.au .
Dual sector provider	Dual sector providers are registered with both the Tertiary Education Quality and Standards Agency (TEQSA) and the Australian Skills Quality Authority (ASQA) (or in some cases a state regulator) and offer both higher education and vocational education courses.
Excellence in Research for Australia (ERA)	<p>The Australian Research Council (ARC) is responsible for administering Excellence in Research for Australia (ERA). Through ERA the ARC is tasked with identifying excellence in research by comparing Australia's university research efforts against international benchmarks, creating incentives to improve the quality of research, and identifying emerging research areas and opportunities for further development.</p> <p>The first full round of ERA occurred in 2010 (replacing the Research Quality Framework) and the results were published in early 2011. There have been three subsequent rounds of ERA in 2012, 2015 and 2018. The submission for 2018 covered six years (2011-2016) of publications data and three years (2014-2016) of data for research income and other measures.</p>

Field of study/field of education

There are 12 broad (2-digit), 71 narrow (4-digit) and 356 detailed (6-digit) fields of education (study) in the Australian Standard Classification of Education (ASCED). The 12 broad fields of study are:

- Natural and Physical Sciences;
- Information Technology;
- Engineering and Related Technologies;
- Architecture and Building;
- Agriculture, Environmental and Related Studies;
- Health;
- Education;
- Management and Commerce;
- Society and Culture;
- Creative Arts;
- Food, Hospitality and Personal Services; and
- Mixed Field Programs.

Field of research

There are 22 divisions (2-digit), 157 groups (4-digit) and 1238 fields (6-digit) of research in the Australian New Zealand Research Classification (ANZSRC). The 22 broad fields of research are:

- Mathematical Sciences;
- Physical Sciences;
- Chemical Sciences;
- Earth Sciences;
- Environmental Sciences;
- Biological Sciences;
- Agriculture and Veterinary Sciences;
- Information and Computing Sciences;
- Engineering;
- Technology;
- Medical and Health Sciences;
- Built Environment and Design;
- Education;
- Economics;
- Commerce, Management, Tourism and Services;
- Studies in Human Society;
- Psychological and Cognitive Sciences;
- Law and Legal Studies;
- Studies in Creative Arts and Writing;
- Language, Communication and Culture;
- History and Archaeology; and
- Philosophy and Religious Studies.

'Greenfield' university

A 'greenfield' university is a newly established entity which has not previously been registered by TEQSA as a higher education provider and seeks to apply directly for university status.

Higher degrees by research

The term 'higher degrees by research' is used to describe higher education qualifications that primarily involve research namely, Doctoral Degrees (Research) and Masters Degrees (Research).

Higher education award	<p>A higher education award means:</p> <ol style="list-style-type: none"> a) a Diploma, Advanced Diploma, Associate Degree, Bachelor Degree, Bachelor Honours Degree, Graduate Certificate, Graduate Diploma, Masters degree or Doctoral Degree; or b) a qualification covered by Levels 5-10 of the Australian Qualifications Framework; or c) an award of a similar kind or represented as being of a similar kind, to any of the above awards; <p>other than an award offered or conferred for the completion of a vocational education and training course.</p>
Higher education provider	<p>A higher education provider is an institution offering at least one accredited higher education qualification. Also known as 'registered higher education providers', they are registered under Part 3 of the <i>TEQSA Act 2011</i> and are listed on the National Register under Section 198(1a) of the <i>TEQSA Act 2011</i>. Higher education providers include both public and private and self-accrediting and non-self-accrediting institutions.</p>
Higher Education Standards Panel (HESP)	<p>The Higher Education Standards Panel (HESP), established by Section 166 of the <i>TEQSA Act 2011</i>, is responsible for developing and monitoring the Higher Education Standards Framework. HESP members are appointed by the Minister for Education. As from 1 January 2015, the HESP has been supported by the Department of Education.</p>
Higher Education Standards Framework	<p>The <i>Higher Education Standards Framework (Threshold Standards) 2015</i> (Threshold Standards) is a legislative instrument established under the <i>TESQA Act 2011</i>. It commenced on 1 January 2017. For more information about the Threshold Standards see: https://www.legislation.gov.au/Details/F2015L01639.</p>
Pathway providers	<p>Pathway providers serve an important function in offering diploma or foundational courses to help prepare students for entry into higher degrees. Generally, pathway providers have a relationship with a specific university through articulation and credit recognition arrangements, but others may admit students into multiple universities.</p>
Provider category	<p>There are currently six provider categories listed in the Higher Education Provider Category Standards:</p> <ul style="list-style-type: none"> ■ Higher Education Provider ■ Australian University College ■ Australian University of Specialisation ■ Australian University ■ Overseas University ■ Overseas University of Specialisation
Post-secondary education	<p>Post-secondary education encompasses all education and training undertaken after secondary schooling including vocational education and training, higher education, and adult and community education.</p>
Qualification	<p>A qualification is a formal certification, issued by a relevant approved body, to recognise that a person has achieved learning outcomes or competencies relevant to identified individual, professional, industry, or community needs.</p>

Registered Training Organisation (RTO)	A Registered Training Organisation (RTO) is a training provider registered by the Australian Skills Quality Authority (or, in some cases, a state regulator) to deliver vocational education and training services. RTOs deliver certificates I-IV, VET diplomas and advanced diplomas, and VET graduate certificates.
Regulator	The regulator for higher education in Australia is the Tertiary Education Quality and Standards Agency (TEQSA). The main regulator for vocational education in Australia is the Australian Skills Quality Authority (ASQA). The Victorian Registration and Qualifications Authority and the Tertiary Accreditation Council Western Australia are the regulators for VET providers delivering qualifications in those states and to domestic students only.
Research	There are many definitions of research. For the purposes of the Threshold Standards, TEQSA defines research as academic activities of a higher education provider that contribute to new knowledge through original investigation.
Self-accrediting provider	<p>A self-accrediting provider is one which has authority to accredit some or all of its higher education courses. Part B2 of the PCS sets out the criteria for self-accrediting authority. The types of self-accrediting authority that can be authorised by TEQSA are:</p> <ul style="list-style-type: none"> ▪ Unlimited: self-accrediting authority for all higher education courses of study that the provider delivers, or may deliver, in any AQF level or field of education; and ▪ Limited: self-accrediting authority for higher education courses that the provider delivers, or may deliver, in a specific combination of AQF levels and/or fields of education.
Scholarship	Scholarship includes activities concerned with gaining new or improved understanding, appreciation and insights into a field of knowledge, and engaging with and keeping up to date with advances in the field. This includes advances in ways of teaching and learning in the relevant field, developments in professional practice, and advances in disciplinary knowledge through original research.
Sector	The term 'sector' refers to categories of educational activity which are defined in terms of course type and award. Sectors within tertiary education are the higher education sector and the vocational education and training sector.
TAFE institution	A Technical and Further Education (TAFE) institution is a registered training organisation owned and operated by a State government. TAFE institutions deliver the majority of publicly-funded vocational education and training.
Tertiary	Tertiary education in Australia refers to all post-secondary education including both the higher education and vocational education and training sectors.
Tertiary Education Quality and Standards Agency (TEQSA)	The Tertiary Education Quality and Standards Agency (TEQSA) is Australia's independent national quality assurance and regulatory agency for higher education, established by Section 132 of the <i>TEQSA Act 2011</i> .

Third-party arrangements

A third-party arrangement is an arrangement made by a provider with another party (in Australia or overseas) to deliver some or all of a higher education course on behalf of the provider.

University

In Australia, a university is an institution which meets nationally-agreed criteria under the PCS and is established or recognised as a university under State, Territory or Commonwealth legislation.

Vocational education and training (VET)

Vocational Education and Training (VET) provides skills and knowledge for work through a national system of public and private Registered Training Organisations (RTOs).

Appendix A.

Terms of Reference

The Review of the Higher Education Provider Category Standards will:

- a) Assess the effectiveness of the current Provider Category Standards as a framework for higher education delivery
- b) Identify any technical or other relatively minor changes that should be made in the short-term to improve the operation or effectiveness of the current Provider Category Standards
- c) Analyse a range of possible different systems for the categorisation of higher education institutions, drawing on international experience and recent critical analysis including:
 1. the key characteristics that are or would be relevant to defining the various categories of provider within each categorisation framework canvassed
 2. the benefits and drawbacks of each approach for students, for higher education providers, other tertiary education providers, regulators, governments and the broader economy
 3. the impact of adopting different institutional categories, for example:
 - The potential for diversity of providers and student populations in each system
 - Appropriate barriers to and facilitation of new provider entry
 - Change management and transitional issues that would need to be taken into account in moving to a new approach
- d) Outline realistic and practical options that could be considered for adoption if a revised approach to categorising higher education providers in the Australian context were deemed to be warranted
- e) Make recommendations as to:
 1. the most appropriate categorisation system for Australian higher education delivery and
 2. criteria settings within each of the recommended provider categories.

Stakeholders will be consulted as part of the Review.

Appendix B.

Review Process

The 2017–18 Budget higher education reform package included a measure for the Higher Education Standards Panel (HESP) to oversee a Review of the Higher Education Provider Category Standards (PCS). The Review was part of the Australian Government's commitment to continuous improvement of its education quality assurance measures.

On 17 October 2018, the Hon Dan Tehan MP, Minister for Education, announced the appointment of Emeritus Professor Peter Coaldrake AO to undertake the PCS Review.

Reviewer

Emeritus Professor Peter Coaldrake AO

Higher Education Standards Panel (HESP)

The HESP provided steering oversight for the Review.

HESP Members

Professor Ian O'Connor AC (Chair)
Professor Kerri-Lee Krause (Deputy Chair)
The Hon Phil Honeywood
Dr Krystal Evans
Dr Don Owers AM
Dr Sadie Heckenberg
Ms Adrienne Nieuwenhuis
Professor Kent Anderson

Secretariat

A secretariat from the Australian Government Department of Education supported the activities of the Review.

Secretariat Team

Dr Peter Nolan, Director
Ms Julie Brandon, Assistant Director
Mr Josh Donnelly, Assistant Director
Ms Jessica Wright, Policy Officer
Mr Gabriel Coburn, Policy Officer

Executive Support

Ms Dan Donegan, Branch Manager
Ms Liz De Luca, Acting Branch Manager
Mr Stephen Erskine, Acting Branch Manager

Scoping Study

In June 2018, the LH Martin Institute at the University of Melbourne was commissioned to undertake a scoping study on the PCS to help inform the HESP in its planning for the Review. The scoping study is available at www.education.gov.au/review-higher-education-provider-category-standards.

Terms of Reference

On 5 December 2018, the terms of reference for the PCS Review (see [Appendix A](#)) were released and are available at www.education.gov.au/review-higher-education-provider-category-standards.

Public Submissions

On 5 December 2018, Professor Coaldrake released a Discussion Paper inviting public submissions to the PCS Review by 8 March 2019. The Discussion Paper set out a number of considerations to help guide submissions, including:

- the way Australia defines its higher education providers and universities
- how the PCS signal differentiation across the sector
- how the PCS can be optimised to best meet student, industry, regulator, and government needs.

The discussion paper is available at www.education.gov.au/review-higher-education-provider-category-standards.

The public submission process was open to all interested parties and sought comments on issues and concerns, and potential alternatives or improvements, to the PCS. A total of 67 submissions were received (see [Appendix B1](#)) and are available at www.education.gov.au/review-higher-education-provider-category-standards.

Stakeholder Consultations

From 1 November to 29 November 2018, Professor Coaldrake undertook preliminary consultations in Canberra with higher education peak bodies prior to release of the Discussion Paper for the review.

From 28 February to 3 April 2019, Professor Coaldrake undertook targeted consultations with key stakeholders across Australia. Stakeholders included universities and other higher education providers, peak bodies, student groups, industry bodies, State and Territory departments, regulatory bodies, and education policy experts.

From 15 July to 13 August 2019, Professor Coaldrake undertook a further round of targeted consultations with higher education peak bodies in Melbourne, Canberra and Sydney.

Throughout the Review period, Professor Coaldrake consulted from time to time with the Australian Government Department of Education, the Tertiary Education Quality and Standards Agency (TEQSA), lead reviewers appointed by the Australian Government for other reviews, education policy experts, and individual providers.

Opportunities to publicly share findings and seek feedback on possible landing points were also facilitated through conferences and other forums.

Professor Coaldrake considered the full range of issues and suggestions put forward by stakeholders through the submissions and consultations. The list of key stakeholders consulted is provided at [Appendix B2](#).

Final Review Report

Professor Coaldrake presented this Final Report to the Hon Dan Tehan MP, Australian Government Minister for Education in September 2019.

Appendix B1. List of Public Submissions

The public submission process opened on 5 December 2018. All interested parties were encouraged to make a submission by 8 March 2019.

A total of 67 public submissions were received, listed below in alphabetical order. One author who specifically requested that their submission remain confidential is not included in this list.

Submissions are available at www.education.gov.au/review-higher-education-provider-category-standards.

Public submissions

Alphacrucis College
Australian Association for Research in Education
Australian Catholic University
Australian Film Television and Radio School
Australian Institute of Business
Australian Institute of Police Management
Australian Library and Information Association
Australian Technology Network of Universities
Avondale College of Higher Education
Batchelor Institute
Charles Darwin University
Charles Sturt University
Council of Australian University Librarians
CQUniversity
Curtin University
Deakin University
Edith Cowan University
Foster, Dr David
Griffith University
Group of Eight
Holmesglen Institute
Independent Higher Education Australia (formerly Council of Private Higher Education)
Independent Tertiary Education Council Australia (formerly Australian Council of Private Education and Training)
Innovative Research Universities
JMC Academy
Kenvale College
La Trobe University
Loxton, Professor John
Macleay College
Macquarie University
Melbourne Institute of Technology
Melbourne Polytechnic
Monash College
Monash University
National Institute of Dramatic Art
National Tertiary Education Union

Public submissions

Navitas

Northern Territory Department of Education

Queensland University of Technology

Regional Universities Network

Swinburne University

Sydney College of Divinity

TAFE Queensland

Tertiary Education Quality and Standards Agency

The College of Law

The University of Adelaide

The University of Melbourne

The University of Queensland

The University of Sydney

Top Education Institute

Torrens University Australia

Universities Australia

University of Canberra

University of Divinity

University of Newcastle

University of Notre Dame

University of South Australia

University of Southern Queensland

University of Technology Sydney

University of the Sunshine Coast

University of Wollongong

UTS Insearch

Victoria University

Victorian TAFE Association

Western Sydney University

William Angliss Institute

Appendix B2. List of Consulted Stakeholders

Key stakeholders consulted as part of this Review are listed by type in alphabetical order (by trading name except where noted).

Higher Education Providers

ACER (The Australian Council for Educational Research Limited*)

Acknowledge Education

Alphacrucis College

Asia Pacific International College

Australian College of Nursing

Australian College of Theology

Australian Film Television and Radio School

Australian Institute of Business

Batchelor Institute of Indigenous Tertiary Education

BBI The Australian Institute of Theological Education

Box Hill Institute

Campion College Australia

Canberra Institute of Technology

Christian Heritage College

Collarts (Australian College of the Arts*)

EQUALS International

Holmesglen Institute

International College of Hotel Management

JMC Academy

Kaplan Education

Macleay College

Melbourne Institute of Technology

Melbourne Polytechnic

Monash College

Montessori World Educational Institute (Australia)

Moore Theological College

National Institute of Dramatic Art

Navitas

North Metropolitan TAFE

Perth Bible College

Photography Studies College

SAE Creative Media Institute

Sydney College of Divinity

Tabor

TAFE NSW Higher Education

TAFE Queensland

TAFE South Australia

The Cairnmillar Institute

The College of Law

Top Education Group Limited*

UTS Insearch

William Angliss Institute

* Legal Business Name

Individuals

Andrew Norton (Grattan Institute)
Dr Alan Finkel AO (Australia's Chief Scientist)
Dr David Foster (William Angliss Institute)
Emeritus Professor Denise Bradley AC
Professor Glyn Davis AC
Professor Ian Chubb AC FAA
Professor Peter Noonan (AQF Review)
The Honourable Steven Joyce (VET Review)

Industry

Business Council of Australia

Peak Bodies

Australian Technology Network of Universities
Career Industry Council of Australia
Group of Eight
Independent Higher Education Australia (formerly Council for Private Higher Education)
Independent Tertiary Education Council Australia (formerly Australian Council of Private Education and Training)
Innovative Research Universities
National Tertiary Education Union
Regional Universities Network
TAFE Directors Australia
Universities Australia
Victorian TAFE Association

Registered Training Organisation

Kenvale College

Regulators

Australian Skills Quality Authority
Tertiary Education Quality and Standards Agency

State/Territory Governments

Department of Education and Training Victoria
New South Wales Department of Education
Northern Territory Department of Education
Northern Territory Department of Trade, Business and Innovation
Queensland Government Department of Education
Queensland Government Department of Employment, Small Business and Training
South Australia Department for Education

Student Groups

Council of International Students Australia

National Aboriginal and Torres Strait Islander Postgraduates Association

National Union of Students

TEQSA Student Expert Advisory Group

University College

Avondale College of Higher Education

Universities

Australian Catholic University

Bond University

Carnegie Mellon University Australia

Charles Darwin University

Charles Sturt University

CQUniversity

Curtin University

Deakin University

Edith Cowan University

Federation University Australia

Flinders University

Griffith University

James Cook University

La Trobe University

Macquarie University

Monash University

Murdoch University

Queensland University of Technology

RMIT University

Southern Cross University

The Australian National University

The University of Adelaide

The University of Melbourne

The University of Newcastle

The University of Queensland

The University of Sydney

The University of Western Australia

Torrens University Australia

University of Canberra

University of Divinity

University of New England

University of New South Wales*

University of Notre Dame Australia

University of Southern Queensland

University of Tasmania

University of Technology Sydney*

University of the Sunshine Coast

Universities

University of Wollongong

Victoria University

Western Sydney University

* Legal Business Name

Appendix C.

Existing Higher Education Standards Framework, Part B: Criteria for Higher Education Providers

PART B: Higher Education Provider Category Standards

B1: Criteria for Classification of Higher Education Provider Categories

All providers of higher education that gain registration by TEQSA through meeting the Higher Education Standards Framework become 'Higher Education Providers'. This title signals to the public that the provider is a bona fide provider of quality higher education in Australia.

Higher education providers are able to seek approval within a particular provider category under subsection 18(1) of the Tertiary Education Quality and Standards Agency Act 2011. There are several provider categories that use the word 'university':

- Australian University
- Australian University College
- Australian University of Specialisation
- Overseas University
- Overseas University of Specialisation.

A higher education provider must meet the additional criteria for use of a provider category that uses the word 'university'.

B1.1 “Higher Education Provider” Category

The higher education provider offers an Australian higher education qualification and/or an overseas higher education qualification

1. The higher education provider meets the Higher Education Standards Framework and offers at least one accredited course of study.
2. The higher education provider has a clearly articulated higher education purpose that includes a commitment to and support for free intellectual inquiry in its academic endeavours.
3. The higher education provider delivers teaching and learning that engage with advanced knowledge and inquiry.
4. The higher education provider's academic staff are active in scholarship that informs their teaching, and are active in research when engaged in research student supervision.

B1.2 “Australian University” Category

The higher education provider offers an Australian higher education qualification

1. The higher education provider self-accredits and delivers undergraduate and postgraduate courses of study that meet the Higher Education Standards Framework across a range of broad fields of study (including Masters Degrees (Research) and Doctoral Degrees (Research) in at least three of the broad fields of study it offers).

2. The higher education provider has been authorised for at least the last five years to self-accredit at least 85% of its total courses of study, including Masters Degrees (Research) and Doctoral Degrees (Research) in at least three of the broad fields of study.
3. The higher education provider undertakes research that leads to the creation of new knowledge and original creative endeavour at least in those broad fields of study in which Masters Degrees (Research) and Doctoral Degrees (Research) are offered.
4. The higher education provider demonstrates the commitment of teachers, researchers, course designers and assessors to the systematic advancement and dissemination of knowledge.
5. The higher education provider demonstrates sustained scholarship that informs teaching and learning in all fields in which courses of study are offered.
6. The higher education provider identifies and implements good practices in student teaching and learning, including those that have the potential for wider dissemination nationally.
7. The higher education provider offers an extensive range of student services, including student academic and learning support, and extensive resources for student learning in all disciplines offered.
8. The higher education provider demonstrates engagement with its local and regional communities and demonstrates a commitment to social responsibility in its activities.
9. The higher education provider has systematic, mature internal processes for quality assurance and the maintenance of academic standards and academic integrity.
10. The higher education provider's application for registration has the support of the relevant Commonwealth, State or Territory government.

B1.3 “Australian University College” Category

The higher education provider offers an Australian higher education qualification

1. The higher education provider has realistic and achievable plans to meet all the criteria for an “Australian University” Category within five years of its approval to use the title “Australian University College”.
2. The higher education provider self-accredits and delivers undergraduate and postgraduate courses of study that meet the Higher Education Standards Framework across a range of broad fields of study (including Masters Degrees (Coursework) in at least three broad fields of study and Masters Degrees (Research) and Doctoral Degrees (Research) in at least one of the broad fields of study it offers).
3. The higher education provider undertakes research that leads to the creation of new knowledge and original creative endeavour at least in those broad fields of study in which Masters Degrees (Research) and Doctoral Degrees (Research) are offered.
4. The higher education provider demonstrates the commitment of teachers, researchers, course designers and assessors to the systematic advancement and dissemination of knowledge.
5. The higher education provider demonstrates sustained scholarship that informs teaching and learning in all fields in which courses of study are offered.
6. The higher education provider identifies and implements good practices in student teaching and learning, including those that have the potential for wider dissemination nationally.
7. The higher education provider offers an extensive range of student services, including student academic and learning support, and extensive resources for student learning in all disciplines offered.

8. The higher education provider demonstrates engagement with its local and regional communities and demonstrates a commitment to social responsibility in its activities.
9. The higher education provider has systematic, well developed internal processes for quality assurance and the maintenance of academic standards and academic integrity.
10. The higher education provider's application for registration has the support of the relevant Commonwealth, State or Territory government.

B1.4 “Australian University of Specialisation” Category

The higher education provider offers an Australian higher education qualification

1. The higher education provider self-accredits and delivers undergraduate and postgraduate courses of study that meet the Higher Education Standards Framework in one or two broad fields of study only (including Masters Degrees (Research) and Doctoral Degrees (Research) in these one or two broad fields of study it offers).
2. The higher education provider has been authorised for at least the last five years to self-accredit at least 85% of its total courses of study in one or two broad fields of study only, including Masters Degrees (Research) and Doctoral Degrees (Research) in these broad field/s of study.
3. The higher education provider undertakes research that leads to the creation of new knowledge and original creative endeavour at least in those broad fields of study in which Masters Degrees (Research) and Doctoral Degrees (Research) are offered.
4. The higher education provider demonstrates the commitment of teachers, researchers, course designers and assessors to the systematic advancement of knowledge.
5. The higher education provider demonstrates sustained scholarship that informs teaching and learning in all fields in which courses of study are offered.
6. The higher education provider identifies and implements good practices in student teaching and learning, including those that have the potential for wider dissemination nationally.
7. The higher education provider offers an extensive range of student services, including student academic and learning support, and extensive resources for student learning in all disciplines offered.
8. The higher education provider demonstrates engagement with its local and regional communities and demonstrates a commitment to social responsibility in its activities.
9. The higher education provider has systematic, mature internal processes for quality assurance and the maintenance of academic standards and academic integrity.
10. The higher education provider's application for registration has the support of the relevant Commonwealth, State or Territory government.

B1.5 “Overseas University” Category

The higher education provider offers an overseas higher education qualification

1. The higher education provider is recognised as a university by its home country registration or accreditation authority or equivalent governmental authority, the standing and standards of which are acceptable to TEQSA.
AND
2. The higher education provider meets criteria equivalent to those for the “Australian University” Category.

B1.6 “Overseas University of Specialisation” Category

The higher education provider offers an overseas higher education qualification

1. The higher education provider is recognised as a university by its home country registration or accreditation authority or equivalent governmental authority, the standing and standards of which are acceptable to TEQSA.
AND
2. The higher education provider meets criteria equivalent to those for the “Australian University of Specialisation” Category.

B2: Criteria for Seeking Authority for Self-Accreditation of Courses of Study

Providers with Authority to Self-Accredit some or all Courses of Study

Registration of a higher education provider in certain categories of provider may confer self-accrediting authority on the provider. A higher education provider that is registered in the ‘Australian University’ provider category and meets the requirements under Section 45(1) of the TEQSA Act 2011 is authorised under the TEQSA Act 2011 to self-accredit each course of study that leads to a higher education qualification that it offers or confers. TEQSA will authorise a higher education provider that is registered in the ‘Australian University College’ provider category to self-accredit all of its courses of study. A higher education provider that is registered in the ‘Australian University of Specialisation’ provider category self-accredits some of its courses of study and TEQSA may authorise the provider to self-accredit all of the courses of study it offers, in its one or two broad fields of education only.

Types of Self-Accrediting Authority that may be Sought

1. A higher education provider that is registered in the ‘Higher Education Provider’, ‘Overseas University’ or ‘Overseas University of Specialisation’ provider category, or any other registered provider that proposes to extend the scope of its self-accrediting authority, may seek authorisation from TEQSA to self-accredit:
 - a. one or more existing courses of study
 - b. one or more existing courses of study and new course(s) of study at the same qualification level in the same narrow or broad field of education
 - c. one or more existing courses of study and new course(s) of study at the same qualification level in nominated new narrow or broad field(s) of education
 - d. one or more existing courses of study and new courses of study at one or more new qualification levels in the same narrow or broad field of education
 - e. one or more existing courses of study and new courses of study at one or more qualification levels in nominated new narrow or broad fields of education, or
 - f. all higher education courses of study that it offers, or may offer, irrespective of level of qualification or field of education.

Providers Seeking Authority from TEQSA to Self-Accredit Nominated Courses of Study

1. A provider that is seeking authorisation to self-accredit a nominated course(s) of study as specified in 1a – 1e above is able to demonstrate:
 - a. sustained and sustainable achievement of all of the Standards for Higher Education (Part A) that apply to the provider, including for course approval processes in particular and any delivery arrangements with other parties
 - b. there are no unresolved compliance matters with TEQSA, or conditions outstanding from the most recent registration and course accreditations by TEQSA or a recognised registration or accreditation authority, and there is no history of significant continuing compliance problems in any other assessments, audits or

- reviews of its higher education operations conducted by TEQSA, professional bodies or government agencies
- c. a history over at least five years of successful delivery of the course(s) of study for which self-accrediting authority is sought, which is supported by evidence of student success based on analysis of trend data including completion rates and times, attrition rates and grades awarded that are referenced against credible national or international comparators and encompass at least three cohorts of graduates from each course of study
 - d. where a cycle of review and improvement is required by the Standards for Higher Education (Part A) in relation to courses of study and their oversight (see Table 3), the provider has, in relation to all course(s) of study proposed for self-accreditation:
 - i. completed at least one cycle of review and improvement in relation to all relevant standards
 - ii. demonstrated successful implementation of evidence-based improvements arising from the reviews, and
 - iii. has established these review and improvement activities as effective sustainable features of the provider's operations across all courses of study.

Table 3 – Standards Referring to Review and Improvement Activities

Higher Education Standards	Applicable Standards
2. Learning Environment	
2.2 Diversity and Equity	2.2.3
5. Institutional Quality Assurance	
5.3 Monitoring, Review and Improvement	Entire section
6. Governance and Accountability	
6.1 Corporate Governance	6.1.2d
6.2 Corporate Monitoring and Accountability	6.2.1f
6.3 Academic Governance	6.3.2

Providers Seeking Authority from TEQSA to Self-Accredit All Courses of Study

1. Where a provider is seeking self-accrediting authority under Criterion 1f for all courses of study that it offers, or may offer, in addition to meeting Criteria 2a – 2d, the provider is able to demonstrate the necessary capacity and capability to provide new courses leading to any level of higher education qualification in any field of education, including:
 - a. processes for the design, delivery, accreditation, monitoring, quality assurance, review and improvement of existing courses of study that are transferrable to any new courses of study and any new level of qualification offered
 - b. capability in planning and establishment of new courses of study in new broad fields of education
 - c. capacity for competent academic governance, oversight and scrutiny of the accreditation of new courses in new broad fields of education
 - d. sufficient breadth and depth of academic leadership, scholarship and expertise in relevant disciplines to guide entry into and sustain new levels and broad fields of higher education, and
 - e. where professional accreditation is applicable to otherwise self-accredited courses, professional accreditation can reasonably be expected to be obtained and maintained.

Appendix D.

Recommended Categorisation and Criteria for Higher Education Providers

PART B: Higher Education Provider Category Standards

B1: Criteria for Higher Education Provider Categories

All providers of higher education must gain registration from TEQSA through meeting the requirements of Part A of the *Higher Education Standards Framework* to become 'higher education providers'. Higher education providers seek approval within a particular provider category under subsection 18(1) of the *TEQSA Act 2011*. There are four provider categories:

- Institute of Higher Education;
- National Institute of Higher Education;
- Australian University; and
- Overseas University in Australia.

In assessing applications for registration in a particular provider category, TEQSA will have regard to the objects of the *TEQSA Act 2011*, in particular, to protect and enhance:

- i. Australia's reputation for quality higher education and training services;
- ii. Australia's international competitiveness in the higher education sector; and
- iii. excellence, diversity and innovation in higher education in Australia.

TEQSA will have regard to the basic principles of regulation under Part 2 of the *TEQSA Act 2011* when exercising its powers and applying these standards. These principles are:

- i. the principle of regulatory necessity;
- ii. the principle of reflecting risk; and
- iii. the principle of proportionate regulation.

The provider category of each higher education provider will be detailed on the National Register of Higher Education Providers (administered by TEQSA).

To provide transparency, all registered higher education providers should feature their TEQSA Provider Identification and provider category on relevant public material.

B1.1 'Institute of Higher Education' Category

The higher education provider meets Part A of the *Higher Education Standards Framework* and has a clearly articulated quality higher education purpose.

The higher education provider's academic and teaching staff are active in scholarship that informs their teaching, supported by the provider.

B1.2 'National Institute of Higher Education' Category

The higher education provider meets Part A of the *Higher Education Standards Framework*, has a clearly articulated quality higher education purpose, and meets the additional criteria below.

All registered higher education providers, both those seeking to enter the category and those currently registered in the category, must demonstrate a mature level of development and a track record of compliance against each criterion.

The higher education provider:

1. has authority to self-accredit at least 70 per cent (at time of application to TEQSA) of its total courses of study;
2. has a history of at least five years of successful delivery with strong student outcomes, taking into account different student cohorts. Student outcomes can be measured against a variety of sources deemed acceptable to TEQSA, such as graduate outcomes, adjusted attrition rates, and measures of student experience;
3. has mature and advanced processes for the design, delivery, accreditation, monitoring, quality assurance, review and improvement of courses of study, and the maintenance of academic integrity;
4. demonstrates systematic support for scholarship and demonstrates scholarly activities and outcomes that inform teaching, learning, and professional practice, and make a contribution to the advancement and dissemination of knowledge;
5. identifies and implements good practices and advances in teaching and learning, and shares those practices with the higher education sector more broadly;
6. has sufficient depth of academic leadership and expertise in the fields of education it delivers to guide teaching, learning, and academic governance; and
7. demonstrates engagement with employers, industry, and the professions in areas such as course development, work-integrated learning, and research partnerships.

A higher education provider may choose to remain in this category indefinitely for the duration of its registration. Alternatively, a higher education provider registered in this category may wish to build capacity and position itself to apply for registration in the 'Australian University' category.

B1.3 'Australian University' Category

The higher education provider meets Part A of the *Higher Education Standards Framework*, has a clearly articulated quality higher education purpose, and meets the additional criteria below.

All registered higher education providers, both those seeking to enter the category and those currently registered in the category, must demonstrate a mature level of development and a track record of compliance against each criterion. In the case of a 'greenfield' provider, that is, for a newly established entity which has not been registered by TEQSA as a higher education provider and seeks to apply directly for 'Australian University' status, TEQSA will have consideration of whether the provider would realistically be able to meet these criteria at the time of its registration or within an agreed timeframe.

A higher education provider registered in this category automatically has authority to self-accredit each course of study that leads to a higher education qualification in all fields of education. Where an 'Australian University' wishes to specialise in one or two broad fields of education only, TEQSA will deem it to have a specialised focus and self-accrediting authority will be limited to the one or two broad (2-digit) fields of education in which it specialises. With authorisation from TEQSA, an 'Australian University' with a specialised focus may expand its offerings to new broad (2-digit) field/s of education.

Where an 'Australian University' with a specialised focus delivers courses in new broad (2-digit) field/s of education, the provider must be successful in seeking authorisation to self-accredit courses in the new field/s within 10 years from the commencement of those courses. Upon reaching at least three broad (2-digit) fields of education (including Doctoral Degrees (Research)), the 'Australian University' is no longer deemed to have a specialised focus.

At the time of application to TEQSA for entry to the 'Australian University' category, the higher education provider must:

- be authorised to self-accredit courses in at least three broad (2-digit) fields of education (including Doctoral Degrees (Research) in each), or one or two broad fields in the case of universities with a specialised focus; and
- at least 75 per cent of these self-accredited courses must have been through at least one cycle of review and improvement by the provider.

For new entrants to the 'Australian University' category, research requirements will be assessed against the percentage set out in criterion B1.3.3 (a) and (b) for the first ten years after entry to the category. Following this period, the provider's research requirements will be assessed against the percentage set out in criterion B1.3.4.

The higher education provider:

1. is authorised to self-accredit courses and deliver a range of undergraduate and postgraduate courses of study in at least three broad (2-digit) fields of education, or one or two broad (2-digit) fields of education only in the case of universities with a specialised focus;
2. delivers Doctoral Degrees (Research) in:
 - a. at least three, or at least 50 per cent, of the broad (2-digit) fields of education it delivers, whichever is greater; or
 - b. all broad (2-digit) fields of education it delivers in the case of universities with a specialised focus;
3. from the commencement date of this instrument until 31 December 2029, undertakes research at or above world standard that leads to the creation of new knowledge and original creative endeavour in:
 - a. at least three, or at least 30 per cent, of the broad (2-digit) fields of education it delivers, whichever is greater; or
 - b. all broad (2-digit) fields of education it delivers in the case of universities with a specialised focus.

Quality and quantity of research in each field will be measured and benchmarked against a variety of measures deemed acceptable by TEQSA, which may include peer review, citation analysis, and other national and international benchmarks. Where a provider delivers courses in new broad (2-digit) field/s of education, the provider may nominate for those field/s not to be considered in the quantum of fields for the purposes of compliance of this criterion for a period of no more than ten years from the commencement of those course offerings;

4. from 1 January 2030, undertakes research at or above world standard that leads to the creation of new knowledge and original creative endeavour in:
 - a. at least three, or at least 50 per cent, of the broad (2-digit) fields of education it delivers, whichever is greater; or
 - b. all broad (2-digit) fields of education in the case of specialised universities.

Quality and quantity of research in each field will be measured and benchmarked against a variety of measures deemed acceptable by TEQSA, which may include peer review, citation analysis, and other national and international benchmarks. Where a provider delivers courses in new broad (2-digit) field/s of education, the provider may nominate for those field/s not to be considered in the quantum of fields for the purposes of compliance of this criterion for a period of no more than ten years from the commencement of those course offerings;

5. has a history of at least five years of successful delivery with strong student outcomes, taking into account different student cohorts. Student outcomes can be measured against a variety of sources deemed acceptable to TEQSA, such as graduate outcomes, adjusted attrition rates, and measures of student experience;
6. has mature and advanced processes for the design, delivery, accreditation, monitoring, institutional quality assurance, review and improvement of courses of study, and the maintenance of academic integrity;
7. demonstrates systematic support for scholarship and demonstrates scholarly activities and outcomes that inform teaching, learning, and professional practice and make a contribution to the advancement and dissemination of knowledge;
8. identifies and implements good practices and advances in teaching and learning, and shares those practices with the higher education sector more broadly;
9. has breadth and depth of academic leadership and expertise in the fields of education it delivers, to guide teaching, learning, and academic governance;

10. demonstrates engagement with employers, industry, and the professions in areas such as course development, work-integrated learning, and research partnerships;
11. demonstrates strong civic leadership, engagement with its local and regional communities, and demonstrates a commitment to social responsibility; and
12. has the support of the relevant State, Territory or Commonwealth government for its application for registration in the Australian University category.

B1.4 'Overseas University in Australia' Category

The higher education provider delivers at least one overseas higher education award in Australia. Its profile in Australia may be an element of its broader international offerings.

The higher education provider:

1. is recognised as a university by its home country registration or accreditation authority or equivalent governmental authority, the standing and standards of which are acceptable to TEQSA; and
2. meets criteria equivalent to those for the 'Australian University' category.

B2: Criteria for Seeking Self-Accrediting Authority

Providers can apply to TEQSA for self-accrediting authority. The types of self-accrediting authority that can be authorised by TEQSA are:

- Unlimited: self-accrediting authority for all higher education courses of study that the provider delivers, or may deliver, in any level or field of education; or
- Limited: self-accrediting authority for higher education courses that the provider delivers, or may deliver, in a specific combination of levels and/or fields of education.

A provider that is seeking authorisation for unlimited or limited self-accreditation must demonstrate that:

1. it has consistently maintained compliance with Part A of the *Higher Education Standards Framework*;
2. it has a five year track record of applications for course accreditation that have consistently been found by TEQSA to meet Part A of the *Higher Education Standards Framework* and there are no outstanding conditions imposed on any of the provider's courses;
3. there are no unresolved compliance matters or conditions outstanding from the most recent registration by TEQSA or a recognised registration or accreditation authority. There is also no history of continuing compliance issues in any other assessments, audits, or reviews of its higher education operations conducted by TEQSA, relevant professional bodies (if appropriate) or government agencies;
4. it has complied with the following standards from Part A of the *Higher Education Standards Framework* (2.2.3, 5.3, 6.1.3.d, 6.2.1.f and 6.3.2) in relation to its academic governance, course approval processes and the course(s) of study in which self-accreditation is sought. In addition, it has:
 - a. completed at least one cycle of review and improvement in relation to the course(s) of study in which self-accreditation is sought;
 - b. demonstrated successful implementation of evidence-based improvements arising from the reviews; and
 - c. established course review and improvement activities as effective features of the provider's operations across all courses of study.

Appendix E.

Higher Education Provider Access to Australian Government Funding and Self-Accrediting Authority Status

The following table sets out higher education provider access to Australian Government funding through the Commonwealth Grant Scheme (CGS), FEE-HELP and Research Block Grants (RBG). It also identifies the self-accrediting authority (SAA) status, including those that have limited self-accrediting authority, of each higher education provider. Providers are listed in alphabetical order by legal business name as per the TEQSA National Register.

Universities						
Provider Category	Table	Provider Name	CGS	FEE-HELP	RBG	SAA
Australian University	Table A	Australian Catholic University Limited	Y	Y	Y	Y
Australian University	Table A	Australian National University	Y	Y	Y	Y
Australian University	Table B	Bond University Limited	Y*	Y	Y	Y
Australian University	Table A	Central Queensland University	Y	Y	Y	Y
Australian University	Table A	Charles Darwin University	Y	Y	Y	Y
Australian University	Table A	Charles Sturt University	Y	Y	Y	Y
Australian University	Table A	Curtin University of Technology	Y	Y	Y	Y
Australian University	Table A	Deakin University	Y	Y	Y	Y
Australian University	Table A	Edith Cowan University	Y	Y	Y	Y
Australian University	Table A	Federation University Australia	Y	Y	Y	Y
Australian University	Table A	Flinders University	Y	Y	Y	Y
Australian University	Table A	Griffith University	Y	Y	Y	Y
Australian University	Table A	James Cook University	Y	Y	Y	Y
Australian University	Table A	La Trobe University	Y	Y	Y	Y
Australian University	Table A	Macquarie University	Y	Y	Y	Y
Australian University	Table A	Monash University	Y	Y	Y	Y
Australian University	Table A	Murdoch University	Y	Y	Y	Y
Australian University	Table A	Queensland University of Technology	Y	Y	Y	Y
Australian University	Table A	Royal Melbourne Institute of Technology	Y	Y	Y	Y
Australian University	Table A	Southern Cross University	Y	Y	Y	Y
Australian University	Table A	Swinburne University of Technology	Y	Y	Y	Y
Australian University	Table B	Torrens University Australia Ltd	N	Y	Y	Y
Australian University	Table A	The University of Adelaide	Y	Y	Y	Y
Australian University	Table A	The University of Melbourne	Y	Y	Y	Y
Australian University	Table B	The University of Notre Dame Australia	Y	Y	Y	Y
Australian University	Table A	The University of Queensland	Y	Y	Y	Y
Australian University	Table A	The University of Sydney	Y	Y	Y	Y
Australian University	Table A	The University of Western Australia	Y	Y	Y	Y

Provider Category	Table	Provider Name	CGS	FEE-HELP	RBG	SAA
Australian University	Table A	University of Canberra	Y	Y	Y	Y
Australian University	Table A	University of Newcastle	Y	Y	Y	Y
Australian University	Table A	University of New England	Y	Y	Y	Y
Australian University	Table A	University of New South Wales	Y	Y	Y	Y
Australian University	Table A	University of South Australia	Y	Y	Y	Y
Australian University	Table A	University of Southern Queensland	Y	Y	Y	Y
Australian University	Table A	University of Tasmania	Y	Y	Y	Y
Australian University	Table A	University of Technology Sydney	Y	Y	Y	Y
Australian University	Table A	University of the Sunshine Coast	Y	Y	Y	Y
Australian University	Table A	University of Wollongong	Y	Y	Y	Y
Australian University	Table A	Victoria University	Y	Y	Y	Y
Australian University	Table A	Western Sydney University	Y	Y	Y	Y
University of Specialisation	Table B	University of Divinity	Y*	Y	Y	Y (limited)
Overseas University	Table C	Carnegie Mellon University	N	Y	N	Y
Overseas University	Table C	University College London	N	Y	N	Y
Australian University College	N/A	Avondale College Ltd	Y	Y	N	Y

* specified in the *Commonwealth Grant Scheme Guidelines 2012* as a non-Table A higher education provider that can be paid grants under Part 2-2 of the *Higher Education Support Act 2003* but does not currently have a CGS Funding Agreement with the Australian Government Department of Education.

Higher Education Providers						
Provider Category	Provider Name	CGS	FEE-HELP	RBG	SAA	
Higher Education Provider	Academies Australasia Polytechnic Pty Limited (formerly AMI Education Pty Ltd)	N	N	N	N	
Higher Education Provider	Academy of Design Australia Limited (formerly Australian Academy of Design Inc)	N	Y	N	N	
Higher Education Provider	Academy of Information Technology Pty Ltd	N	Y	N	N	
Higher Education Provider	Acknowledge Education Pty Ltd (formerly Stott's Colleges Pty Ltd)	N	Y	N	N	
Higher Education Provider	ACPE Limited	N	Y	N	N	
Higher Education Provider	Adelaide Central School of Art Incorporated	N	Y	N	N	
Higher Education Provider	Adelaide College of Divinity Incorporated	N	Y	N	N	
Higher Education Provider	Adelaide Institute of Higher Education Pty Ltd	N	N	N	N	
Higher Education Provider	Alphacrucis College Limited	N	Y	N	Y (limited)	
Higher Education Provider	Asia Pacific International College Pty Ltd	N	N	N	N	
Higher Education Provider	Australasian College of Health and Wellness Pty Ltd (formerly MHM Higher Education Pty Ltd)	N	Y	N	N	
Higher Education Provider	Australian Academy of Music and Performing Arts (formerly International Conservatorium of Music (Aust))	N	Y	N	N	
Higher Education Provider	Australian Campus Management Pty Ltd	N	N	N	N	
Higher Education Provider	Australian Chiropractic College Limited	N	N	N	N	
Higher Education Provider	Australian College of Christian Studies Ltd (formerly Tabor College (NSW) Ltd)	N	Y	N	N	
Higher Education Provider	Australian College of Natural Medicine Pty Ltd	N	Y	N	N	
Higher Education Provider	Australian College of Nursing Ltd	N	Y	N	N	
Higher Education Provider	Australian College of the Arts Pty Ltd	N	Y	N	N	
Higher Education Provider	Australian College of Theology Limited	N	Y	N	Y (limited)	

Provider Category	Provider Name	CGS	FEE-HELP	RBG	SAA
Higher Education Provider	Australian Film, Television and Radio School	N	Y	N	Y
Higher Education Provider	Australian Guild of Music Education Inc.	N	Y	N	N
Higher Education Provider	Australian Institute of Business and Management Pty Ltd	N	Y	N	N
Higher Education Provider	Australian Institute of Business Pty Ltd	N	Y	N	N
Higher Education Provider	Australian Institute of Higher Education Pty Ltd	N	N	N	N
Higher Education Provider	Australian Institute of Management Education and Training Pty Limited	N	Y	N	N
Higher Education Provider	Australian Institute of Professional Counsellors Pty Ltd As Trustee For AIPC Trust	N	Y	N	N
Higher Education Provider	Batchelor Institute of Indigenous Tertiary Education	Y**	Y	Y	Y (limited)
Higher Education Provider	BBI The Australian Institute of Theological Education (formerly The Broken Bay Institute)	N	Y	N	N
Higher Education Provider	Box Hill Institute (formerly Box Hill Institute of TAFE)	N	Y	N	N
Higher Education Provider	Campion Institute Limited	N	Y	N	N
Higher Education Provider	Canberra Institute of Technology	N	Y	N	N
Higher Education Provider	Centre for Pavement Engineering Education Incorporated	N	N	N	N
Higher Education Provider	Chartered Accountants Australia and New Zealand (formerly The Institute of Chartered Accountants in Australia)	N	N	N	N
Higher Education Provider	Chisholm Institute (formerly Chisholm Institute of Technical and Further Education)	N	Y	N	N
Higher Education Provider	Christian Heritage College	Y	Y	N	N
Higher Education Provider	CIC Higher Education Pty Ltd (formerly Cambridge International College (Vic) Pty Ltd)	N	N	N	N
Higher Education Provider	Colleges of Business and Technology (WA) Pty Ltd	N	Y	N	N
Higher Education Provider	Commissioner of the Australian Federal Police [Australian Institute of Police Management]	N	N	N	N
Higher Education Provider	Commonwealth of Australia [Bureau of Meteorology]	N	N	N	N
Higher Education Provider	Crown Institute of Higher Education Pty Ltd	N	N	N	N
Higher Education Provider	Eastern College Australia Incorporated (formerly Tabor College (Victoria) Inc.)	Y	Y	N	N
Higher Education Provider	Eastern Health	N	N	N	N
Higher Education Provider	Edith Cowan College Pty Ltd (formerly Perth Institute of Business and Technology Pty Ltd)	N	Y	N	N
Higher Education Provider	Educational Enterprises Australia Pty Ltd	N	Y	N	N
Higher Education Provider	Elite Education Institute Pty. Ltd.	N	N	N	N
Higher Education Provider	Engineering Institute of Technology Pty Ltd	N	Y	N	N
Higher Education Provider	EQUALS International (Aust) Pty Ltd	N	N	N	N
Higher Education Provider	Excelsia College (formerly Wesley Institute)	N	Y	N	Y (limited)
Higher Education Provider	Gestalt Therapy Brisbane Pty Ltd	N	Y	N	N
Higher Education Provider	Governance Institute of Australia Ltd (formerly Chartered Secretaries Australia Ltd)	N	N	N	N
Higher Education Provider	Group Colleges Australia Pty Ltd	N	Y	N	N
Higher Education Provider	Health Education and Training Institute	N	Y	N	N
Higher Education Provider	Higher Education Leadership Institute Pty Ltd	N	Y	N	N
Higher Education Provider	Holmes Institute Pty Ltd as Trustee for Holmes Institute Trust	N	Y	N	N
Higher Education Provider	Holmesglen Institute (formerly Holmesglen Institute of TAFE)	Y	Y	N	N
Higher Education Provider	ICHM Pty Ltd	N	Y	N	N
Higher Education Provider	INSEARCH Limited	N	Y	N	N

Provider Category	Provider Name	CGS	FEE-HELP	RBG	SAA
Higher Education Provider	Institute for Emotionally Focused Therapy Pty Ltd	N	N	N	N
Higher Education Provider	Institute of Health & Management Pty Ltd	N	N	N	N
Higher Education Provider	International College of Management, Sydney Pty. Limited	N	Y	N	N
Higher Education Provider	International Institute of Business and Technology (Australia) Pty Ltd	N	N	N	N
Higher Education Provider	ISN Psychology Pty Ltd	N	Y	N	N
Higher Education Provider	Jazz Music Institute Pty Ltd	N	Y	N	N
Higher Education Provider	JMC Pty. Limited	N	Y	N	N
Higher Education Provider	Kaplan Business School Pty Limited	N	Y	N	N
Higher Education Provider	Kaplan Higher Education Pty Ltd	N	Y	N	N
Higher Education Provider	Kent Institute Australia Pty Ltd (formerly The Centre of Academic Excellence Pty. Ltd)	N	Y	N	N
Higher Education Provider	Kollel Academy of Advanced Jewish Education Limited	N	N	N	N
Higher Education Provider	Le Cordon Bleu Australia Pty Limited	N	Y	N	N
Higher Education Provider	Leaders Institute Pty Ltd	N	N	N	N
Higher Education Provider	Leo Cussen Institute (formerly Leo Cussen Institute for Continuing Legal Education)	N	Y	N	N
Higher Education Provider	Macleay College Pty Limited	N	Y	N	N
Higher Education Provider	Marcus Oldham College	N	Y	N	N
Higher Education Provider	Mayfield Education Inc.	N	N	N	N
Higher Education Provider	Melbourne Institute of Business and Technology Pty Ltd	N	Y	N	N
Higher Education Provider	Melbourne Institute of Technology Pty Ltd	N	Y	N	N
Higher Education Provider	Melbourne Polytechnic (formerly Northern Melbourne Institute of TAFE)	Y	Y	N	N
Higher Education Provider	Monash College Pty Ltd	N	Y	N	N
Higher Education Provider	Montessori World Educational Institute (Australia) Inc	N	N	N	N
Higher Education Provider	Moore Theological College Council	N	Y	N	Y (limited)
Higher Education Provider	Morling College Ltd	N	Y	N	N
Higher Education Provider	Nan Tien Institute Limited	N	Y	N	N
Higher Education Provider	National Art School	N	Y	N	N
Higher Education Provider	National Institute of Organisation Dynamics Australia Ltd	N	Y	N	N
Higher Education Provider	Navitas Bundoora Pty Ltd	N	Y	N	N
Higher Education Provider	Navitas Professional Institute Pty Ltd (formerly Australian College of Applied Psychology Pty. Limited)	N	Y	N	Y (limited)
Higher Education Provider	Newcastle International College Pty Ltd	N	N	N	N
Higher Education Provider	North Metropolitan TAFE	N	Y	N	N
Higher Education Provider	Oxford Institute of Higher Education Pty Ltd	N	N	N	N
Higher Education Provider	Performing Arts Education Pty Ltd	N	N	N	N
Higher Education Provider	Perth Bible College	N	Y	N	N
Higher Education Provider	Photography Holdings Pty Ltd	N	Y	N	N
Higher Education Provider	Polytechnic Institute Australia Pty Ltd	N	N	N	N
Higher Education Provider	Proteus Technologies Pty Ltd	N	Y	N	N
Higher Education Provider	Queensland Institute of Business & Technology Pty Ltd	N	Y	N	N
Higher Education Provider	Raffles College Pty Ltd	N	Y	N	N
Higher Education Provider	Russo Business School Pty Ltd (formerly Russo Higher Education 2 Pty Ltd)	N	Y	N	N
Higher Education Provider	S P Jain School of Global Management Pty Limited	N	Y	N	N

Provider Category	Provider Name	CGS	FEE-HELP	RBG	SAA
Higher Education Provider	SAE Institute Pty Limited	N	Y	N	N
Higher Education Provider	Sheridan College Inc.	N	N	N	N
Higher Education Provider	Sicop Education & Technology Pty Ltd	N	N	N	N
Higher Education Provider	South Australian Institute of Business and Technology Pty Ltd	N	Y	N	N
Higher Education Provider	South Metropolitan TAFE	N	Y	N	N
Higher Education Provider	Southern Cross Education Institute (Higher Education) Pty Ltd	N	N	N	N
Higher Education Provider	Stanley International College Pty Ltd	N	N	N	N
Higher Education Provider	Study Group Australia Pty Limited	N	Y	N	N
Higher Education Provider	Sydney College of Divinity Ltd	N	Y	N	Y (limited)
Higher Education Provider	Sydney Institute of Business and Technology Pty Ltd	N	Y	N	N
Higher Education Provider	Sydney Institute of Health Sciences Pty. Limited	N	Y	N	N
Higher Education Provider	Tabor College Incorporated	Y	Y	N	N
Higher Education Provider	TAFE Queensland	N	Y	N	N
Higher Education Provider	TAFE SA	N	Y	N	N
Higher Education Provider	Technical and Further Education Commission [TAFE NSW Higher Education]	N	Y	N	N
Higher Education Provider	The Australasian College of Dermatologists	N	N	N	N
Higher Education Provider	The Australian Council for Educational Research Limited	N	N	N	N
Higher Education Provider	The Australian Institute of Music Limited	N	Y	N	N
Higher Education Provider	The Cairnmillar Institute	N	Y	N	N
Higher Education Provider	The College of Law Limited (formerly TCOL Limited)	N	Y	N	Y (limited)
Higher Education Provider	The Institute of Internal Auditors-Australia	N	N	N	N
Higher Education Provider	The Institute of International Studies (TIIS) Pty Ltd	N	N	N	N
Higher Education Provider	The MIECAT Institute Inc. (formerly Melbourne Institute for Experiential and Creative Arts Therapy)	N	Y	N	N
Higher Education Provider	The National Institute of Dramatic Art	N	Y	N	Y (limited)
Higher Education Provider	The Tax Institute	N	N	N	N
Higher Education Provider	Think: Colleges Pty Ltd	N	Y	N	N
Higher Education Provider	Top Education Group Pty Ltd	N	Y	N	Y (limited)
Higher Education Provider	UOWC Ltd (formerly ITC Education Ltd)	N	Y	N	N
Higher Education Provider	Victorian Institute of Technology Pty Ltd	N	Y	N	N
Higher Education Provider	Wentworth Institute of Higher Education Pty Ltd (formerly Victory Institute of Higher Education Pty Ltd)	N	Y	N	N
Higher Education Provider	Western Sydney University International College Pty Ltd	N	N	N	N
Higher Education Provider	Whitehouse Institute Pty Ltd	N	Y	N	N
Higher Education Provider	William Angliss Institute of TAFE	N	Y	N	N

** Batchelor Institute of Indigenous Tertiary Education is a Table A higher education provider under the *Higher Education Support Act 2003* but does not currently have a CGS Funding Agreement with the Australian Government Department of Education

Appendix F.

Selected Comparison of International Higher Education Systems

Different higher education systems worldwide employ distinct schemes for categorising and describing higher education providers/institutions. These are either directly connected to the regulation and governance of the system, such as in Australia, or operate as prominent schemes that are widely accepted and used by higher education providers. The latter, for example, would include the Carnegie Classification in the United States.¹²⁰

The following table provides an indicative description of different provider types and/or categories in higher education and, where appropriate, vocational education and training, from selected systems around the world. While every effort has been made to ensure the information is accurate, it is based on available sources as at September 2019.

Country Overview	Higher Education Provider Descriptions
<p>Brazil</p> <p>Three tertiary categories regulated by the Ministry of Education.</p>	<p>University: public (Federal, State or Municipal), private, or Catholic institutions that offer undergraduate and postgraduate qualifications, conduct research, carry out extension programs/community outreach, and are self-accrediting institutions. Such institutions also include:</p> <ul style="list-style-type: none"> ▪ <i>Private higher education institutions</i> – may be community, denominational/religious, philanthropic, or for-profit; ▪ <i>Federal Institutes of Professional Education, Science and Technology</i> – public institutions that provide technological/vocational education programs and offer both sub-degree and undergraduate qualifications. Federal Institutes are equivalent to Federal Universities for the purposes of regulation, supervision, and evaluation. <p>University Centre: private university level, multi-course teaching institutions that do not have to undertake research and are self-accrediting. They focus on undergraduate education, though some University Centres may offer postgraduate courses at the Specialisation or Masters degree levels.</p> <p>Faculties (<i>faculdades</i>): smaller institutions that often operate as a consortia of independent education providers. They offer undergraduate and postgraduate qualifications and are non self-accrediting (i.e. are required to seek permission from the Ministry of Education to introduce new courses). Faculties generally have a smaller course offering and specialise in specific areas such as engineering, economics, or administration courses.</p> <p>Sources:</p> <ul style="list-style-type: none"> ▪ e-MEC. (2019). <i>Cadastro Nacional de Cursos e Instituições de Educação Superior</i>. Retrieved from: http://emec.mec.gov.br/; ▪ Ministério da Educação. (2017). <i>Brazilian Higher Education System - Presidential Decree</i>. Retrieved from: http://www.planalto.gov.br/ccivil_03/_Ato2015-2018/2017/Decreto/D9235.htm; and ▪ Ministério da Educação. (2018). <i>Instituições Credenciadas</i>. Retrieved from: http://portal.mec.gov.br/instituicoes-credenciadas-sp-1781541355.

¹²⁰ Croucher, G., Goedegebuure, L., James, R., and Ahsan, A. (2018). *Scoping Study to Inform the Review of the Higher Education Provider Category Standards*. p.8. Retrieved from: <https://docs.education.gov.au/node/51736>.

Country Overview	Higher Education Provider Descriptions
Canada (Province of Ontario)	
<p>Arrangements are regulated by provinces rather than by the Government of Canada. In the case of Ontario, there are Colleges and Universities regulated by the Ministry of Training.</p>	<p>University: mostly public, autonomous, institutions that offer undergraduate, postgraduate, and other professional qualifications, have degree-granting authority, and conduct scholarship and research. The 'university' title is protected under federal regulation.</p> <p>Colleges: Colleges of Applied Arts and Technology (CAATs) and Institutes of Technology and Advanced Learning collectively known as 'colleges' are public institutions that offer career-oriented sub-bachelor, undergraduate, graduate certificate, and apprenticeship qualifications.</p> <p>Private Career College: registered colleges that are independent businesses and not-for-profit institutions that are regulated by the Ontario government and have their programs approved by the Ministry of Training, Colleges and Universities.</p> <p>Sources:</p> <ul style="list-style-type: none"> ▪ Government of Canada. (2017). 4.3.2 Use of the term 'university'. Retrieved from: https://www.ic.gc.ca/eic/site/cd-dgc.nsf/eng/cs01287.html#p4.3.2; ▪ Ontario College Application Service (OCAS). (2019). Types of Programs at Ontario Colleges. Retrieved from: https://www.ontariocolleges.ca/en/apply/program-types; ▪ Ontario Ministry of Training, Colleges and Universities. (2019). Private Career Colleges (PCC): Frequently Asked Questions for Students. Retrieved from: http://www.tcu.gov.on.ca/pepg/audiences/pcc/faq_pcc.html; and ▪ Universities Canada. (n.d.) Membership Criteria. Retrieved from: https://www.univcan.ca/about-us/membership-and-governance/membership-criteria/.
Denmark	
<p>Five higher education categories (two university and three other higher education providers) mostly regulated by the Ministry of Higher Education and Science.</p>	<p>Universities: public institutions that conduct research, offer research-based undergraduate and postgraduate qualifications, are autonomous and have community engagement expectations.</p> <p>Institutions in Architecture and Art: public university-level institutions that offer undergraduate and postgraduate qualifications in fields including fine arts, architecture, design, library, and information services. Institutions offering programs in fine and performing arts are regulated by the Ministry of Culture. Of the four institutions, one is self-governing and three are State-owned.</p> <p>Maritime Education Institutions: public institutions that offer undergraduate and postgraduate qualifications for the Danish merchant fleet and the fishing industry.</p> <p>University Colleges: public institutions that offer professionally-oriented undergraduate degree qualifications, must have connections with industry, and work closely with universities and other research institutions.</p> <p>Business Academies: public institutions that offer professionally-oriented diploma and undergraduate degree qualifications in close collaboration with regional stakeholders including industry, university colleges, and universities.</p> <p>Source: Danish Ministry of Higher Education and Science. (2015). <i>The Danish Higher Education System</i>. Retrieved from: https://ufm.dk/en/education/higher-education/the-danish-higher-education-system.</p>

Country Overview	Higher Education Provider Descriptions
Finland	
<p>Two parallel higher education categories. While all providers are independent, the Universities Act and the Universities of Applied Sciences Act state that providers must regularly participate in external evaluations, mainly carried out by the Finnish Education Evaluation Centre.</p>	<p>Universities: public institutions that offer a comprehensive range of undergraduate and postgraduate qualifications informed by high-level scientific research. Universities are independent legal entities.</p> <p>Universities of Applied Sciences (polytechnics): public multidisciplinary and regional institutions whose activities highlight their connection to working life and regional development. They offer undergraduate and postgraduate (do not have the right to confer Doctoral degrees) qualifications and conduct applied research and development. They are independent legal entities and require an operating license granted by the Government.</p> <p>Sources:</p> <ul style="list-style-type: none"> European Commission. (2019). <i>Finland: Quality Assurance in Higher Education</i>. Retrieved from: https://eacea.ec.europa.eu/national-policies/eurydice/finland/quality-assurance-higher-education_en; and Finnish Ministry of Education and Culture. (n.d.) <i>Higher education institutions, science agencies, research institutes and other public research organisations</i>. Retrieved from: https://minedu.fi/en/heis-and-science-agencies.
France	
<p>The French Code of Education defines legal categories of higher education institutions covering a variety of types of institutions that provide training with different purposes and admission requirements.</p> <p>Most providers are public, approved and regulated by the Ministry of Higher Education, Research and Innovation (the Ministry). Higher education in France is generally free; 20 per cent of students attend private institutions.</p> <p>The High Council for Evaluation of Research and Higher Education (Hcéres) is responsible for the evaluation and quality assurance of higher education and research institutions.</p>	<p>Universities: public institutions that offer a comprehensive range of undergraduate and postgraduate qualifications, conduct research, and are autonomous. All students who have a high school qualification can apply to attend a university. 60 per cent of French higher education students attend universities.</p> <p>Schools and Institutes outside of Universities:</p> <ul style="list-style-type: none"> '<i>Grands Établissements</i>' (<i>major institutions</i>) – highly prestigious public institutions that conduct teaching and research. Some students must have a high school qualification plus two years of tertiary study to apply (including the preparatory classes for the grandes écoles). Parallel to universities, they differ from universities in terms of specialities, legal status, resources, and level of instruction. Types of institutions include 'écoles normales supérieures', 'grandes écoles', public engineering and management schools, and some administrative schools, etc. <i>French Schools abroad</i> – institutions that offer Doctoral and postdoctoral French studies in five countries, conduct research and encourage cultural collaboration. <i>Communities of Universities and Schools (COMUE)</i> – higher education institutions can pool their activities and resources to conduct research, offer qualifications and improve the quality of student life. <p>Private higher education institutes: generally engineering, business, and management institutions. They may be attached to a public institution, such as a university. Normally, they cannot offer national qualifications such as undergraduate and postgraduate degrees, however can do so if granted authorisation by the Ministry. Private institutions must be registered with the Ministry which signals to the public that the State recognises the quality of the institution.</p> <p>Sources:</p> <ul style="list-style-type: none"> Hcéres. (n.d.). <i>Enseignement supérieur, recherche en France: Panorama et évolution externe</i>. Retrieved from: https://www.hceres.fr/fr/enseignement-superieur-recherche-en-france-panorama-et-evolution-externe; Legifrance. (2019). <i>Code de l'éducation</i>. Retrieved from: http://www.legifrance.gouv.fr/affichCode.do?cidTexte=LEGITEX000006071191; Ministère de l'Enseignement Supérieur, de la Recherche et de l'Innovation. (n.d). <i>Etablissements</i>. Retrieved from: http://www.enseignementsup-recherche.gouv.fr/pid24598/etablissements.html; Ministère de l'Enseignement Supérieur, de la Recherche et de l'Innovation. (2019). <i>Écoles françaises à l'étranger</i>. Retrieved from: http://www.enseignementsup-recherche.gouv.fr/pid29434-cid56594/ecoles-francaises-a-l-etranger.html; and Ministère de l'Enseignement Supérieur, de la Recherche et de l'Innovation. (2019). <i>Repères et Références Statistiques sur les Enseignements, la Formation et la Recherche</i>. Retrieved from: https://cache.media.education.gouv.fr/file/2019/51/6/depp-rers-2019_1162516.pdf.

Country Overview	Higher Education Provider Descriptions
Germany	
<p>Three main higher education categories, allocated by the State Ministers for Education and Cultural Affairs.</p> <p>Due to the federal system in Germany, responsibility for education, including higher education, lies predominantly with the individual federal states. Therefore, the structure of the various systems of higher education may differ from state to state.</p>	<p>University: predominately public institutions that offer a range of academic disciplines and have a strong research focus. Universities are the only institutions that can award Doctoral degrees and have higher entry requirements than other higher education providers. Some universities specialise in particular fields.</p> <p>University of Applied Sciences: institutions that offer practically-oriented undergraduate and postgraduate qualifications in engineering and other technical disciplines, business-related studies, social work, and design areas. Research is generally applied rather than theoretical.</p> <p>Colleges of Arts/Music: institutions with university equivalent status that offer studies for artistic careers in fine arts, performing arts, and music.</p> <p>Source: German Rectors' Conference (HRK). (2019). <i>Higher Education in Germany</i>. Retrieved from: https://www.hrk.de/activities/higher-education-system/.</p>
India	
<p>Three categories of higher education providers. Higher education is the shared responsibility of both the Centre and the States.</p> <p>The coordination and determination of standards and approval of Universities and Colleges is entrusted to the University Grants Commission (UGC) and other statutory regulatory bodies.</p>	<p>Universities and University-Level Institutions: institutions that are empowered to award degrees, and are established or incorporated by or under a Central Act, a Provincial Act or a State Act. The main categories of institutions of this type are:</p> <ul style="list-style-type: none"> ▪ <i>Central University</i> – established by or incorporated by a Central Act; ▪ <i>State University</i> – established by or incorporated by a Provincial Act or a State Act; ▪ <i>Private University</i> – established through a Central Act or a State Act by a sponsoring body; and ▪ <i>Deemed-to-be University</i> – high performing institute as declared by the Central Government. <p>Other types include open universities, institutes of national importance and institutes under a State Legislature Act.</p> <p>Colleges Affiliated with/Recognised by a University</p> <ul style="list-style-type: none"> ▪ <i>Colleges Affiliated with a University</i> – institutions that deliver a course of study offered by a university and examines students. After three successful terms, some colleges are granted 'Autonomous Status' which allows them to confer degrees under their title with the university seal. ▪ <i>Colleges Recognised by a University</i> – institutions attached to a university that award degrees being run through the institution, for example the Indian Military Academy. <p>Stand-Alone Institutions: institutions outside the purview of a university or a college that generally offer Diploma/Postgraduate Diploma level qualifications for which they require recognition from a statutory body. Such institutions include polytechnics, teacher training institutions and institutions under the control of the Indian Nursing Council.</p> <p>Sources:</p> <ul style="list-style-type: none"> ▪ Government of India Ministry of Human Resource Development Department of Higher Education. (2016). <i>University and Higher Education</i>. Retrieved from: https://mhrd.gov.in/university-and-higher-education; and ▪ Government of India Ministry of Human Resource Development Department of Higher Education. (2015). <i>All India Survey on Higher Education</i>. Retrieved from: http://aishe.nic.in/aishe/viewDocument.action?documentId=175.

Country Overview	Higher Education Provider Descriptions
<p>Japan</p> <p>Six tertiary categories (one university, one higher education and four VET categories) regulated by the Ministry of Education, Culture, Sports, Science and Technology.</p>	<p>University: publicly and privately funded institutions that offer undergraduate and postgraduate qualifications and conduct research. The university title is awarded as part of the classification.</p> <p>Junior College: these institutions are mostly privately funded institutions that require graduation from upper secondary schools, or equivalent, for admission and offer two or three-year Associate degrees.</p> <p>Professional University: institutions providing four-year practical vocational-focussed Bachelor degrees. The first institutions opened in April 2019.</p> <p>Professional College: institutions providing two-three year practical vocational-focussed Associate degrees. The first institution opened in April 2019.</p> <p>College of Technology: trade and technical schools that require graduation from lower secondary schools, or equivalent, for admission and offer five-year Associate degrees for skilled trades and technical careers.</p> <p>Professional Training College (Specialised Training College): institutions that offer Diplomas and Advanced Diplomas for vocational careers. Students can transfer to universities or go on to graduate schools.</p> <p>Source: Ministry of Education, Culture, Sports, Science and Technology Japan (MEXT). (2019). 教育: 大学・大学院、専門教育. Retrieved from: http://www.mext.go.jp/a_menu/01_d.htm.</p>
<p>The Netherlands</p> <p>Higher education comprises higher professional education (HBO) and university education (WO). Higher education is regulated by the Netherlands Accreditation Organisation and Flanders (NVAO) and/or the Ministry of Education, Culture and Science (the Ministry).</p>	<p>University Education</p> <ul style="list-style-type: none"> Universities combine academic research and teaching. University education focusses on training in academic disciplines, the independent pursuit of scholarship, the application of scholarly knowledge in the context of a profession, and the generation of new knowledge. The government funding awarded to a university depends in part on performance indicators, such as the number of first-year students, and the number of degrees awarded. Universities may use government funding for either teaching or research as they see fit. <p>Higher Professional Education</p> <ul style="list-style-type: none"> <i>Institutions of Higher Professional Education (HBO)</i> – publicly funded institutions that provide theoretical and practical training for occupations for which a higher vocational qualification is required, including trade, industry, social services, health care, and the public sector. Research tends to be application-related. <i>Private Institutions</i> – private organisations that do not receive government funding but may be recognised by the Ministry to provide accredited higher education programs and to confer statutorily recognised Associate, Bachelor and Masters qualifications. <p>Sources:</p> <ul style="list-style-type: none"> Government of the Netherlands. (2019). <i>Higher Education</i>. Retrieved from: https://www.government.nl/topics/secondary-vocational-education-mbo-and-higher-education/higher-education; and NVAO. (2019). <i>Recognition of new institution (recognised private institutions)</i>. Retrieved from: https://www.nvao.net/en/procedures/the-netherlands/recognition-of-new-institution-recognised-private-institutions.

Country Overview	Higher Education Provider Descriptions
New Zealand	
<p>The New Zealand national regulator (NZQA) places tertiary education organisations (TEOs) (described adjacent) other than universities into four categories of capability:</p> <ul style="list-style-type: none"> - <i>Category 1</i>: two Highly Confident judgements from external evaluation and review, or Highly Confident in educational performance and Confident in capability in self-assessment. - <i>Category 2</i>: two Confident judgements, or Highly Confident in self-assessment and Confident in educational performance. - <i>Category 3</i>: at least one Not Yet Confident judgement. - <i>Category 4</i>: at least one Not Confident judgement. 	<p>University: an autonomous, publicly funded institution that has a wide diversity of teaching and research, especially at a higher level, maintains, advances, disseminates, and assists the application of knowledge, develops intellectual independence, and promotes community learning.</p> <p>There are two bodies overseeing the quality assurance of universities - Universities New Zealand (responsible for qualification and regulation approval, accreditation and program moderation procedures) and the Academic Quality Agency for New Zealand Universities (which supports universities in their achievement of standards of excellence in research, and teaching, through regular institutional audits, and the promotion of quality enhancement practices across the sector).</p> <p>Institutes of Technology and Polytechnics (ITPs): an institution that is characterised by a wide diversity of continuing education, including vocational training, that contributes to the maintenance, advancement, and dissemination of knowledge and expertise. These institutions also promote community learning and research, particularly applied and technological research, that aids development.</p> <p>Private Training Establishments (PTEs): private organisations that offer education or training. Many companies and government training establishments register their staff training operations as training establishments.</p> <p>Government Training Establishment: a state-owned organisation providing education or training (for example, NZ Police Training Services or the New Zealand Army).</p> <p>Wānanga: a teaching and research institution that maintains, advances and disseminates knowledge, develops intellectual independence, and assists the application of knowledge regarding āhuatanga Māori (Māori tradition) according to tikanga Māori (Māori custom).</p> <p>Industry Training Organisation: a body recognised as having responsibility for setting standards and arranging the delivery of industry training for the sector they represent. These organisations are not education providers, but can become accredited to register assessors within specified fields of the New Zealand Qualifications Framework.</p> <p>Sources:</p> <ul style="list-style-type: none"> ▪ Academic Quality Agency for New Zealand Universities. (2019). <i>Academic Quality Agency for New Zealand Universities</i>. Retrieved from: https://www.aaa.ac.nz/; and ▪ New Zealand Parliamentary Counsel Office. (2019). <i>Education Act 1989</i>. Retrieved from: http://www.legislation.govt.nz/act/public/1989/0080/latest/DLM175959.html; ▪ New Zealand Qualifications Authority (NZQA). (n.d.). <i>About Education Organisations</i>. Retrieved from: https://www.nzqa.govt.nz/providers-partners/about-education-organisations/; ▪ Universities New Zealand. (2019). <i>About the university sector</i>. Retrieved from: https://www.universitiesnz.ac.nz/about-university-sector.

Country Overview	Higher Education Provider Descriptions
<p>Norway</p> <p>Four higher education categories regulated by the Norwegian Agency for Quality Assurance in Education (NOKUT).</p>	<p>Universities: institutions that are regulated by the <i>Universities and Colleges Act 2005</i> and offer both undergraduate and postgraduate qualifications in a range of fields and are self-accrediting at all levels.</p> <p>Specialised University Institutions: institutions that specialise in a narrow range of fields of study and have the right to establish courses at all levels within their fields of specialisation. Most institutions offer programs up to the Doctoral degree level. They are self-accrediting in the fields in which they have been granted the right to award Doctoral degrees.</p> <p>University Colleges: institutions that provide training in specific fields such as education, social work, journalism and health professions. Accredited institutions have the right to establish programs up to Bachelor degree level. If they intend to establish programs above this level then they would apply to NOKUT for approval. They are self-accrediting in the fields in which they have been granted the right to award Doctoral degrees.</p> <p>University Colleges with accredited programs: institutions that are not accredited on an institutional basis but have specific programs accredited by NOKUT.</p> <p>Sources:</p> <ul style="list-style-type: none"> Nordic National Recognition Information Centres (NORRIC). (n.d). <i>The Norwegian Higher Education System</i>. Retrieved from: https://noric.org/nordbalt/norway; Norwegian Agency for Quality Assurance in Education. (n.d). <i>Accredited Institutions</i>. Retrieved from: https://www.nokut.no/en/surveys-and-databases/accredited-institutions/; Norwegian Agency for Quality Assurance in Education. (n.d). <i>The institutions' authorisation to accredit and recognize study programmes</i>. Retrieved from: https://www.nokut.no/en/utdanningskvalitet/self-accreditation; <i>Universities and University Colleges Act 2005 (Norway)</i>. Retrieved from: https://www.nokut.no/siteassets/om-nokut/universities_and_university_colleges_act.pdf;
<p>People's Republic of China</p> <p>Tertiary institutions are divided between a regular higher education sector and an adult higher education sector.</p> <p>Sources:</p> <ul style="list-style-type: none"> Ministry of Education of the People's Republic of China. (1988). <i>成人高等学校设置的暂行规定 (Interim provision on the establishment of adult higher education institutions)</i>. Retrieved from: http://old.moe.gov.cn/publicfiles/business/htmlfiles/moe/moe_621/2010_01/81942.html. Ministry of Education of the People's Republic of China. (2019). <i>2019年全国高等学校名单 (2019 National List of Higher Education Institutions)</i>. Retrieved from: http://www.moe.gov.cn/jyb_xxgk/s5743/s5744/201906/t20190617_38620_0.html; and Ministry of Education of the People's Republic of China. (2019). <i>中华人民共和国高等教育法 (Higher Education Law of the People's Republic of China)</i>. Retrieved from: http://www.moe.gov.cn/s78/A02/zfsleft/s5911/moe_619/201512/t20151228_226196.html. 	<p>Regular Higher Education Sector</p> <p>Universities and other degree-granting institutions: public and private institutions that offer undergraduate and postgraduate qualifications and are approved by the Ministry of Education. As part of the Vocational Education Reform, 'Vocational Universities' were introduced in mid-2019 and can offer Bachelor degrees in practical subjects. Public institutions are administered by national or provincial level government bodies including the Central Military Commission.</p> <p>Higher Vocational Institutions: institutions that offer two or three year courses in specialised fields that meet the needs of China's economy and are approved by provincial level governments. Higher Vocational Institutions typically include polytechnics, vocational colleges, and vocational and technical colleges.</p> <p>Adult Higher Education Sector</p> <p>Adult Higher Education Institutions: institutions that offer degree (higher vocational level and Bachelor degree level) qualifications and non-degree studies through three types of flexible delivery: full-time, after-hours and through correspondence. Radio and online education are also available in some subjects. The vast majority of adult higher education institutions are public, and the aim of such institutions is to provide education to the working population, lifting skills and managerial knowledge of individuals across industries.</p>

Country Overview	Higher Education Provider Descriptions
<p>Singapore</p> <p>Five tertiary institution types (one university, three other higher education providers, and one vocational) regulated by the Ministry of Education (public institutions) or Committee for Private Education (private Enterprises Institutions category).</p> <p>Sources:</p> <ul style="list-style-type: none"> Ministry of Education Singapore. (2019). <i>Post-Secondary Education</i>. Retrieved from: https://www.moe.gov.sg/education/post-secondary; and Ministry of Education Singapore. (2019). <i>Private Education</i>. Retrieved from: https://www.moe.gov.sg/education/private-education. 	<p>Universities: autonomous, comprehensive, publicly-funded organisations that conduct research and offer undergraduate and postgraduate qualifications.</p> <p>Arts Institutions: specialised creative arts institutions that offer publicly-funded diploma programs and receive government funding for select degree programs.</p> <p>Polytechnics: institutions with the mission to train professionals to support the technological and economic development of Singapore and offer up to diploma level qualifications. Students may go on to complete more study at universities.</p> <p>Institute of Technical Education (ITE) College: institutions that offer a range of vocational qualifications and operates as the national authority for the setting of skills standards and the certification of skills in Singapore.</p> <p>Private Education Institutions (PEIs): private providers regulated by the Committee for Private Education. A range of certificates and diplomas are offered at these institutions.</p>
<p>South Korea</p> <p>Two broad higher education categories (one university and two other higher education providers) under the jurisdiction of the Ministry of Education.</p> <p>Source: Department of Education, Korean Educational Development Institute. (2018). <i>Statistical Yearbook of Education</i>. Korean Educational Statistics Service. Retrieved from: http://kess.vedi.re.kr/eng/index.</p>	<p>Universities: generally private, comprehensive, autonomous institutions that offer undergraduate and postgraduate qualifications across at least three colleges (including at least one graduate school). They conduct research in various domains of knowledge. Students study for at least four years. Other types of university-level education can include:</p> <ul style="list-style-type: none"> <i>University of Education</i> – universities solely dedicated to producing primary school teachers; <i>Distance/Cyber University</i> – private universities providing online courses; <i>Industrial University</i> – universities with a focus on practical learning (initially started out as open universities); or <i>Miscellaneous Schools</i> – include universities established under a special Act, such as the Korean National University of Arts. <p>Junior Colleges: institutions offering two or three-year courses leading to Associate degrees and, where accredited, Bachelor degrees. They focus on professional knowledge and theory about distinctive fields of society. Other types of college-level education include:</p> <ul style="list-style-type: none"> <i>Technical Colleges</i> – offer Associate degrees and undergraduate level programs to enhance application of theory and practice in industry (currently only one technical college is established); <i>Colleges in the Company</i> – established by companies, and offer Associate degree and undergraduate level programs for staff; or <i>Specialised Colleges</i> – offer Associate degree programs with flexible entry requirements. Examples include colleges with a focus on music and arts. <p>Polytechnic Colleges: institutions dedicated to developing expert technicians, which offer non-degree vocational training programs and associate degree level programs. They are under the jurisdiction of the Ministry of Employment and Labour (MoEL).</p>

Country Overview	Higher Education Provider Descriptions
Sweden	
<p>Three broad types of higher education institutions. The Swedish Higher Education Authority (Universitetskanslersämbetet or UKÄ) oversees universities and university colleges to ensure they comply with regulations and provide quality higher education.</p> <p>The titles 'university' and 'university college' do not have any usage requirements dictated by regulation – any school can use either term. However an institution of higher education must have granted degree-awarding powers in order to award higher education qualifications (degrees).</p>	<p>Universities: independent public institutions established by the Swedish Parliament with the unrestricted right to award undergraduate and postgraduate qualifications, including Doctoral degrees. These institutions offer a broad range of courses, deliver postgraduate programs in one or more areas, conduct research, and collaborate with the surrounding society. A university must apply to the Swedish Higher Education Authority (UKÄ) for degree awarding powers and also to award fine, applied and performing arts qualifications, and professional degrees. Some universities are specialised in particular disciplines.</p> <p>Providers with university status do not necessarily have to use the title 'university' in their names. An institution that calls itself a 'university' but has not been granted degree awarding powers by UKÄ, is not classified as a university and cannot offer university-recognised qualifications or higher education credits. Such institutions often offer diploma or certificate qualifications.</p> <p>University Colleges: independent public institutions established by the Swedish Parliament and can offer undergraduate degrees but, unlike universities, these institutions do not have the right to independently award Masters or Doctoral degrees without authority from UKÄ. UKÄ can grant permission to award specific Doctoral degrees in a specific subject area. Like universities, a university college must apply to UKÄ for degree awarding powers and to award fine, applied and performing arts qualifications, and professional degrees. Some university colleges are specialised in particular disciplines.</p> <p>Independent Higher Education Providers: private institutions of higher education that are managed by a private body, such as a foundation or association, and not the Government, and generally only offer courses within one or a few fields.</p> <p>Sources:</p> <ul style="list-style-type: none"> Swedish Council for Higher Education. (2019). <i>Universities and University Colleges</i>. Retrieved from: https://www.studera.nu/startpage/higher-education-studies/universities-and-university-colleges/university-och-university-college/; Swedish Higher Education Authority (UKA). (2017). <i>Independent higher education providers</i>. Retrieved from: https://english.uka.se/facts-about-higher-education/higher-education-institutions-heis/independent-higher-education-providers.html; and Swedish Higher Education Authority (UKA). (2017). <i>Universities and University Colleges</i>. Retrieved from: https://english.uka.se/facts-about-higher-education/higher-education-institutions-heis/universities-and-university-colleges.html.

United Kingdom

Six broad higher education institution types.

Universities: institutions that are independent, autonomous, hold degree-awarding powers and must also have a minimum number of higher education students in order to be eligible to apply for the 'university' title (this minimum requirement varies across the four United Kingdom countries: England, Wales, Scotland, and Northern Ireland, each of which has its own higher education administration policy).

To call itself a university, an institution must be authorised to do so by private Act, royal charter, and, until recently in England, by approval of the Privy Council.

University Colleges: institutions with the same requirements as universities although with no minimum, or at least a lower, student number requirement for a 'University' title award (depending on which UK administration).

Other providers with degree awarding powers (DPAS): institutions regulated by one of the UK's four regulatory/funding bodies (depending on which UK administration), meet the expectations of the UK Quality Code, and that deliver awarding body qualifications.

Powers may be granted in relation to three categories of degrees, commonly referred to as 'foundation' degrees, 'taught' degrees, and 'research' degrees. Providers granted taught degree awarding powers are able to award all types of taught degrees (Foundation, Ordinary, Bachelors and taught Masters) but not Doctoral degrees. Only organisations granted research degree awarding powers can award Doctorates. Providers must demonstrate that they are "a self-critical, cohesive academic community" and have gone through a rigorous process of quality assessment before being granted an indefinite award.

Providers with Foundation Degree only powers (FDAPs): only providers that are statutory further education institutions may obtain a Foundation degree only authorisation.

Providers without Degree Awarding Powers themselves: but deliver higher education qualifications validated by another institution which does have Degree Awarding Powers.

Unregulated/unrecognised providers: may fall into any of the above categories but will have no access to public funding. UK providers in the UK are either 'regulated' or they are not (i.e. it is not compulsory for any higher education provider in any administration to engage with the regulator, and there is no 'licence to practice' in the UK – providers can offer higher education without having to engage with Government/regulators).

Source: Higher Education, STEM, and Tertiary Providers Directorate. (2019).

Country Overview	Higher Education Provider Descriptions
<p>United States of America</p> <p>No regulatory categories. Accreditation of institutions (and courses available from independent accrediting bodies) offers some measure of quality assurance.</p>	<p>The Carnegie classification system is generally used for analysis of operating institutions' characteristics.</p> <p>Doctoral Universities: institutions that award at least 20 research and/or scholarship Doctoral degrees or institutions that award at least 30 practice Doctoral degrees. Sub-categories are based on level of research activity. Excludes Special Focus Institutions and Tribal Colleges.</p> <p>Masters Colleges and Universities: institutions that award at least 50 Masters degrees and fewer than 20 Doctoral degrees. Sub-categories are based on the size of the program. Excludes Special Focus Institutions and Tribal Colleges.</p> <p>Baccalaureate Colleges: institutions where baccalaureate or higher degrees represent at least 50 per cent of all degrees but award fewer than 50 Masters degrees or 20 Doctoral degrees. Excludes Special Focus Institutions and Tribal Colleges.</p> <p>Baccalaureate/Associate's Colleges: four-year colleges that confer more than 50 per cent of their degrees at Associate's level. Excludes Special Focus Institutions, Tribal Colleges, and institutions with sufficient enough masters or doctoral degree programs to be categorised as other institution types.</p> <p>Associate's Colleges: institutions where the highest degree awarded is the Associate degree. Sub-categories are based on disciplinary focus and dominant student type. Excludes Special Focus Institutions and Tribal Colleges.</p> <p>Special Focus Institutions: institutions where a high concentration of degrees awarded are in a single field or set of related fields. Excludes Tribal Colleges.</p> <p>Tribal Colleges: colleges and Universities which are members of the American Indian Higher Education Consortium as identified by the Integrated Postsecondary Education Data System (IPEDS) Institutional Characteristics.</p> <p>Source: Carnegie Classification of Institutions of Higher Education. (2017). <i>Basic Classification Description</i>. Retrieved from: http://carnegieclassifications.iu.edu/classification_descriptions/basic.php.</p>

Appendix G.

Interaction with Other Reviews

This PCS Review has been conducted in proximity to a number of other important reviews in, or relevant to, the higher education sector. The following provides a summary of these reviews and their potential interaction with the PCS Review.

Review of the Australian Qualifications Framework

In the 2017-18 Budget, the Australian Government announced a Review of the Australian Qualifications Framework (AQF Review), with a panel of experts to be chaired by Professor Peter Noonan, Professor of Tertiary Education Policy at Victoria University. The AQF Review will be completed in the second half of 2019.

The AQF Review is looking to provide a better definition of each level of regulated qualification to ensure each level is meeting the needs of students, employers and the wider community. The AQF Review is examining contemporary issues such as the recognition of essential capabilities – highly in demand by employers – and how shorter-form credentials, including micro-credentials, should be reflected in the AQF. In addition, the AQF Review is investigating ways to better and more consistently facilitate pathways between levels and qualifications in higher education and VET, possibly through a credit-point system.

Both the PCS and AQF reviews are important examinations to ensure that Australia is positioned to accommodate innovation and changing practices in higher education. With higher education providers under the PCS offering qualifications from AQF Level 5 (Diploma) through to Level 10 (Doctoral Degree), it is imperative that any changes to the PCS do not present unintended problems. Such problems could be for either providers and their delivery across different AQF levels, or for credit recognition and pathways as providers continue to support changing student and employer needs.

Strengthening Skills: Expert Review of Australia's Vocational Education and Training System

In November 2018, the Prime Minister announced an independent Review of Australia's VET sector, to be led by the Honourable Steven Joyce, a former New Zealand Minister for Tertiary Education, Skills and Employment. Mr Joyce delivered this final report, *Strengthening Skills: Expert Review of Australia's VET System* (Joyce Review), to Government in March 2019.

The Joyce Review highlights that Australia's modern economy will need flexible and applied ways of learning to deliver the skills the economy needs for today and tomorrow.

The Australian Government's response to the Joyce Review, through its *Delivering Skills for Today and Tomorrow Package* announced as part of the 2019–20 Budget, has implications for Australia's tertiary education landscape through new investment to upgrade and modernise the VET sector. This activity will complement Australia's higher education sector as providers increasingly deliver, partner and provide pathways across VET and higher education.

These connections between higher education and VET are increasingly important in the context of lifelong learning and the changing nature of work. Longer working lives and a changing labour market will increase the need for Australians to view upskilling and reskilling as the norm; embracing education as a lifelong journey will entail a significant shift from the current bias in which the vast bulk of education is consumed by young people. The further blurring of borders between VET and higher education will be required through active efforts by providers to facilitate pathways and connections between the two sectors.

It is therefore important that this PCS Review ensures that the benchmark standards for Australia's higher education providers fit within this broader tertiary landscape. This is also an imperative given the number of dual sector providers now operating under the PCS. Dual sector institutions help to support increasing numbers of enrolments and mobility of students across both VET and higher education.

Independent Review into Regional, Rural and Remote Education

In 2017, the Australian Government commissioned an Independent Review into Regional, Rural and Remote Education (IRRRRE), led by Emeritus Professor John Halsey from Flinders University. Professor Halsey delivered his final report to Government in April 2018.

IRRRRE considered the key issues, challenges and barriers that impact on the learning outcomes of regional, rural and remote students in Australia. It provided recommendations to support improved access and achievement of these students in school and their transition to further study, training and employment. The Australian Government accepted all 11 recommendations of IRRRRE, which has several implications for higher education providers catering to these students and regions. One of these implications is the expanding of accessibility for Bachelor students at regional study hubs.

Recommendation 11 from IRRRRE was to "establish a national focus for regional, rural and remote education, training and research to enhance access, outcomes and opportunities in regional Australia". In response to this recommendation, a Regional Education Expert Advisory Group, chaired by former Victorian Premier the Hon Dr Denis Napthine, was established to drive a National Regional, Rural and Remote Education Strategy. A final report from the Advisory Group has been provided to Government and is currently under consideration.

This PCS Review considers the requirements of higher education providers in terms of engaging with employers and industry and, in the case of universities, civic leadership and engagement with local and regional communities. For those higher education providers catering to regional, rural and remote communities, these important outreach functions can play a critical role in building aspiration, access and attainment among students.

Performance-Based Funding for the Commonwealth Grant Scheme

In December 2018, the Hon Dan Tehan MP, Minister for Education, announced that an expert panel, chaired by Professor Paul Wellings, Vice Chancellor of the University of Wollongong, would lead consultations with the sector on the implementation of performance-based funding (PBF) reform. A final report was provided to Government on 30 June 2019.

The PBF Review intended to ensure universities focus sufficient attention on the quality of their teaching and student support to ultimately achieve the best possible graduate outcomes. While the PCS have no direct relationship to Commonwealth Government funding for teaching and research, and hence not within the scope of this Review, there is an appreciation that any changes to the PCS need to consider potential funding implications. Some observations in this regard are explored earlier in this Review report. The Recommended Categorisation and Criteria for Higher Education Providers (see [Appendix D](#)) has also adopted terminology largely consistent with the PBF Review concerning graduate outcomes, student success, and measures of student experience.

Independent Review of Freedom of Speech in Australian Higher Education Providers

In December 2018, the Hon Dan Tehan MP, Minister for Education, announced an independent Review into university of freedom to speech to be undertaken by the Hon Mr Robert French AC, former Chief Justice of the High Court Chief of Australia. Mr Justice French delivered the final report to Government in April 2019.

The focus of this Freedom of Speech Review was to assess the effectiveness of university policies and practices to address the requirements of the Threshold Standards to promote and protect freedom of expression and intellectual inquiry on Australian campuses. The Freedom of Speech review recommends amendments to the Threshold Standards and includes a consequential amendment to the criteria for higher education providers set out in criterion B1.1 of the PCS:

The higher education provider has a clearly articulated higher education purpose that includes a commitment to and support for freedom of speech and academic freedom.¹²¹

This recommendation has been carefully considered by this Review. However, in the interest of streamlining the PCS, it is considered that Mr Justice French's recommendation may not be necessary. Freedom of intellectual inquiry is a requirement of the Threshold Standards, and as all providers are required to meet the Threshold Standards in order to be registered by TEQSA, it may be unnecessary to restate the requirement for free intellectual inquiry in the PCS. The recommendations of the Freedom of Speech Review are currently under consideration by the HESP.

¹²¹ French, R. (2019). *Report of the Independent Review of Freedom of Speech in Australian Higher Education Providers*. p.228. Retrieved from: <https://docs.education.gov.au/node/52661>.