

Australian Catholic University

Submission to the Review of the Higher Education Provider Category Standards

March 2019

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EXECUTIVE SUMMARY

Australian Catholic University (ACU) acknowledges the opportunity to respond to the *Review of the Higher Education Provider Category Standards: Discussion Paper* (Discussion Paper).

The Higher Education Provider Category Standards (Standards) serve an important function in establishing and affirming the set of standards and requirements the different categories of higher education providers in Australia must meet. The Standards thus underpin, and are pivotal to, Australia's high quality higher education sector.

In this submission, ACU advances a number of core principles with respect to the Standards. While it is true that higher education both within Australia and across the globe has significantly transformed over the past twenty years (as the Discussion Paper reflects), ACU identifies that there are some fundamental and indeed, defining, characteristics of higher education providers – especially with respect to Australian universities – that should be reinforced and affirmed by the Review. Maintaining these defining features is essential to ensuring that Australia's higher education sector continues to be of high quality, and internationally competitive, into the future.

Fundamentally, the following principles should be assured and maintained by the Review and in any revision of the Standards:

- Australian universities should, by definition, continue to be required to engage in both teaching and research. Australia must not regress to a two-tier higher education system, where only some universities teach and research while others are teaching-only.
- The nexus between teaching, research and scholarship should be inviolable for Australian universities.
- Fundamental principles of university autonomy must be maintained.
- Universities fulfil, and should be expected to fulfil, important community service and community engagement obligations. These broader contributions to the community and society – locally, regionally, and internationally – should be considered an essential element of universities' unique social licence.
- Any changes to provider category definitions and/or standards must not undermine or threaten the quality and standards of Australia's strong public university system.

ACU recognises that the Review also provides an opportunity to reflect on the different categories of higher education providers, as provided for under the Standards, and assess their currency and respective levels of utilisation. To this end, the Review should consider whether some categories should be removed, amended or updated, in the Standards.

ACU suggests that the 'Australian University College', 'Australian University of Specialisation' and 'Overseas University of Specialisation' categories could perhaps be discarded, given their underutilisation to date. As the Discussion Paper reflects, the categories 'Australian University College' and 'Overseas University of Specialisation' are not utilised, and there is only one provider registered as an 'Australian University of Specialisation'.

Furthermore, there may be some merit to considering creating a new and separate category (or awarding some form of differentiated status) for the (currently small) group of Higher Education Providers (HEPs) that have achieved Self-Accrediting Authority. This would serve as a marker of their special status and acknowledge that these providers have achieved a particular level of institutional maturity, and quality in governance and teaching/learning delivery.

Finally, ACU urges the Review to ensure that the Standards affirm that all providers granted the title of 'University' (i.e. encompassing both Australian and Overseas 'University' categories) have community service obligations, requiring them to engage with their local and regional communities and demonstrate a commitment to the public good.

AN AUSTRALIAN ‘UNIVERSITY’ MUST RESEARCH

ACU strongly affirms that the current requirement for an ‘Australian university’ to engage in research, as a defining characteristic, should be maintained.

Universities’ engagement in original research links academics, teachers and students with the latest knowledge and best practice in their disciplines. Universities and university academics are understood and expected to produce knowledge, not just apply it. ACU contends that if Australia is to continue to advance and remain globally competitive, the Australian university system must remain at the forefront of intellectual discovery, rather than being content merely teaching discoveries made by others.

Furthermore, if universities were not required to research, or fewer universities engaged in such activities due to a change in the Standards, the range of research activity and the level of competition and drive towards constant advancement that currently exists within Australia’s diverse university sector would be threatened, potentially concentrating research among a small and lazy clique of institutions. It is therefore vital – both for the incentivisation of quality research and the reputation of Australia’s strong higher education sector – that the research requirement remains in place.

While Australia’s distinctive and successful higher education environment has developed over time, research has been at the centre of what it means to be a university. Australians conceive universities as being places for both teaching *and* research. Indeed, the 2008 Bradley Review identified research as central to the identity of Australia’s universities:

A distinctive feature of our understanding of universities in Australia is that teaching within them is informed by research to develop or apply new knowledge.

The expectation that universities undertake research together with teaching became a feature of Australian universities from the 1950s.¹

As the Discussion Paper also clearly recognises: “These two fundamental features [research and teaching] have become synonymous with the title ‘university’ and have contributed to the good reputation of Australia’s universities internationally for high quality teaching and research.”²

AFFIRMING THE UNIVERSITY RESEARCH-TEACHING NEXUS

The current Standards reflect and recognise that the research, teaching and learning activities of universities work in a complementary manner to support both quality teaching, and quality research, which underpin and support Australia’s workforce, economy and capacity for innovation. As noted, above, the Bradley Review affirmed this link, explicitly stating:

*The large majority of participants in this review have argued that a core role of a university is to conduct basic and applied research. In addition, they have argued that **it is the link between this basic and applied research and the teaching and learning within an institution of learning that has created what we describe today as a university.** The panel agrees with this view.³*

The Review also noted the importance of this research-teaching nexus to the international reputation of Australia’s universities:

***The link between teaching and research is a common feature of respected universities internationally.** While it is difficult to find compelling research evidence which unequivocally supports the argument that graduates with degrees from such institutions are demonstrably better than those from teaching-only institutions, **it would not be in Australia’s best interests to ignore the weight of international opinion and practice on this issue...** The reputation of Australia as a quality provider of international education depends on it being able to provide a clear and unequivocal statement about its intention to maintain a world-class university system. Retaining and strengthening the teaching and research nexus as a cornerstone of university accreditation provides that clear and unequivocal statement of intent.⁴*

If research was not essential to the definition of an Australian university, and only a few select institutions engaged in research, there would be far-reaching implications for the future Australian research workforce, as fewer

¹ Bradley, D., Noonan, P., et al, *Review of Australian Higher Education: Final Report (2008) (Bradley Review)*, at 123.

² Discussion Paper, at 11.

³ Bradley Review, at 86. Emphasis added.

⁴ Bradley Review, at 124. Emphasis added.

universities would be able to meet the requirements to take on research students. This would lead to a decline in research capability and innovation, and have wider economic implications for the nation.

Universities attract and foster the development of some of the best minds nationally and internationally, across a diverse range of disciplines and fields of research. If their research mandate was diluted, diminished or eliminated, this could negatively impact on Australia's research capabilities and economic competitiveness into the future.

It is therefore vitally important that the Standards continue to recognise that the advancement of scholarship at the university level requires an engagement in both research and teaching. As ACU has articulated previously, there is a complex and interdependent connection between university research and teaching:

[T]he connection between university research and teaching – supporting scholarship and enquiry-based learning – can be said to be conceptualised in at least five broad ways:

- *Research informs the content of the courses being taught. Research that is at the fore of the particular discipline being taught as well as the research of the individual academic teaching in the classroom can enrich course content and student engagement.*
- *Students can be taught research methods, which support their learning.*
- *Students can be engaged in active, research-based learning, which can be found in degree programs that are predominantly structured around problem-based or inquiry-based learning but which can be implemented at the level of the individual course where students undertake a research project.*
- *Students can be engaged in discovery research, normally where students work (often one-on-one or as part of research teams) with academics to undertake discovery research or complete dissertations.*
- *The research-teaching nexus encourages academics to engage in pedagogical research, or the scholarship of teaching and learning.*

Universities, through their research activities, afford students the opportunity to be taught by the brightest minds and 'expert authorities' in their areas of study – sometimes by those who have written the material or textbooks being taught. While every student in every field may not always be directly taught by these active researchers, involvement in and exposure to a scholarly community have flow-on benefits to university teaching and learning. Additionally, non-research teaching staff may also build upon their own knowledge through the interactions they can have with their research active colleagues, which also benefits student learning.⁵

Under the current Standards, every 'Australian university' is, appropriately, required to undertake research "that leads to the creation of new knowledge and original creative endeavour" in at least the broad fields of study in which they offer masters or doctoral degrees by research.

ACU notes the comment in the Discussion Paper that, when compared with international practice, Australia is "somewhat unusual in codifying the types or scale of research activity necessary to be classified as 'university'; namely, through the requirement of original research being undertaken in at least three broad fields of study in which higher degrees by research are awarded."⁶

ACU contends that this requirement (i.e. research engagement in *at least* three broad fields of study) sets an appropriate minimum threshold for research activity by individual universities, noting that many universities are research active in more than three broad fields of study. It is also important to acknowledge that, regardless of overseas practice, expectations with respect to university teaching, learning and research activity reflect the particular character, and balanced regulation, of Australia's strong and diverse university sector. This has contributed to the sector's success and world-leading reputation.

Australian universities serve a vital function in the life of the nation, educating the current and future workforce to ensure Australia's ongoing prosperity. As the Group of Eight has observed, ensuring a strong university research culture is tantamount to supporting this important function:

A pervasive research culture is important because it enables universities to focus on learning rather than teaching, thinking as well as doing, debate not just assertion...

A good university is one that provides an exciting environment, one that stimulates the passion and motivation of its students by exposing them to zealous and motivated educators in a setting permeated by the creation of new knowledge and the application of rigorous debate.⁷

In view of this fundamental connection between research, teaching and learning, ACU asserts it is appropriate that the Standards continue to require an 'Australian University' to engage in activity that demonstrates: the "commitment of teachers, researchers, course designers and assessors to the systematic advancement of

⁵ Australian Catholic University, *Submission to the Review of Research Policy and Funding Arrangements* (September 2015).

⁶ Discussion Paper, at 11.

⁷ Group of Eight, *Group of Eight Submission to the Inquiry into Australia's Innovation System* (2014).

knowledge” and “sustained scholarship that informs teaching and learning in all fields in which courses of study are offered”.

UNIVERSITIES AND COMMUNITY SERVICE OBLIGATIONS

ACU submits that the ‘Australian University’ category appropriately reflects the expectation for each Australian University to demonstrate “engagement with its local and regional communities” as well as a “commitment to social responsibility in its activities.” This should be maintained.

Universities play an important role in the community in delivering and supporting programs, training, and initiatives that are vital to meeting local, national, and broader needs.

ACU views community engagement as an integral part of the university’s teaching, learning and research activities. It forms an important part of an ACU education, deliberately and actively requiring the engagement of the university, its students and staff with wider society and with community partners.⁸ Community engagement initiatives, for example, provide students with the opportunity to work with individuals from diverse backgrounds and encourages them to make meaningful contributions beyond attending university classes and completing assignments.⁹

ACU encourages the Review to ensure that any provider registered as an ‘Overseas University’ under the Standards similarly be required to contribute to the local community (or communities) in which they operate.

REDUCE AND/OR REVISE THE HIGHER EDUCATION PROVIDER CATEGORIES

The Review presents an opportunity to reflect on the existing higher education provider categories, and consideration should therefore be given to whether any under-utilised categories may not be necessary. Discarding unnecessary categories would create simplicity and greater clarity and relevance in the Standards.

ACU notes that the following categories of higher education providers currently exist under the Standards:

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

As the Discussion Paper acknowledges, to date there have been no providers registered under the ‘Australian University College’ category. This category could perhaps be discarded.

The category ‘Australian University of Specialisation’ also only has one registered provider, and does not lend to making a strong case for its retention into the future. The category requires providers to fulfil largely the same requirements as those set for an ‘Australian University’, but with a slightly lower threshold with respect to research – requiring the provider to offer qualifications and conduct research within only one or two of the broad fields of study it offers (rather than a minimum three, as for an ‘Australian University’). If a decision is taken to discard this category, regulatory arrangements could be grandfathered for the sole provider currently operating under this category.

ACU also considers it unnecessary to have two categories of ‘Overseas University’ i.e. the ‘Overseas University’ and ‘Overseas University of Specialisation’ categories – there is only a marginal difference between the two with respect to the threshold for engagement in research (similar to Australian University of Specialisation category). The category ‘Overseas University of Specialisation’ could also be discarded, noting that there are currently no providers registered under that category.

Furthermore, ACU suggests that there may be some merit in considering creating a separate, new category (or awarding some form of differentiated status) for the (currently small) group of Higher Education Providers (HEPs) that have achieved Self-Accrediting Authority status. This would serve as a marker of this special status

⁸ For further information, see Australian Catholic University, ‘Community Engagement’. Accessible via <https://www.acu.edu.au/about-acu/community-engagement>

⁹ For instance, all ACU undergraduate law students undertake a pro bono placement as part of their law degree, contributing many hours of work to both the legal profession and to the community. See Australian Catholic University, ‘Student Engagement Opportunities – Pro Bono Placements’, at <https://www.acu.edu.au/about-acu/faculties-directorates-and-staff/faculty-of-law-and-business/thomas-more-law-school/student-engagement-opportunities>

and as acknowledgment that they have been recognised to have achieved a particular level of institutional maturity and quality in governance and teaching/learning delivery.

As TEQSA notes, being granted authority to self-accredit courses is a “significant responsibility”.¹⁰ HEPs who self-accredit their courses of study are vetted by TEQSA. To achieve Self-Accrediting Authority, for all or some courses, a HEP must meet certain criteria (assessed by TEQSA), such as having: a sustained and sustainable achievement of specified Higher Education Standards; no unresolved compliance matters with TEQSA; and a good track record (over at least five years of successful delivery) in delivering the relevant course(s) of study for which self-accrediting authority is sought.¹¹

HEPs that achieve this status are deemed to be accountable for: interpreting the requirements of the *Higher Education Standards Framework (Threshold Standards) 2015* (HES Framework) and judging whether the HES Framework will be appropriately applied and met throughout the development, approval, delivery and discontinuance of a course of study. They are also responsible for ensuring that compliance across all the HES Framework is sustained throughout their higher education operations.¹²

Currently, there are only 12 HEPs (out of a total of 117 HEPs registered by TEQSA¹³) to which TEQSA has granted authority to self-accredit some or all of their courses. Affording some formal recognition to such providers could also serve as an incentive to other providers to reach a similar status, further promoting ongoing improvement and quality higher education delivery in the sector, particularly amongst non-university providers.

¹⁰ TEQSA, ‘Applying for Self-Accrediting Authority’. Accessible via <https://www.teqsa.gov.au/applying-self-accreditation>

¹¹ For instance see TEQSA, ‘Application Guide for Self-Accrediting Authority: Version 3.2 – For applications submitted from 1 January 2017’. Accessible via <https://www.teqsa.gov.au/latest-news/publications/application-guide-self-accrediting-authority>

¹² TEQSA, ‘Applying for Self-Accrediting authority’. Accessible via <https://www.teqsa.gov.au/applying-self-accreditation>

¹³ Current as at February 2019, as per the National Register: TEQSA, ‘National Register’, at <https://www.teqsa.gov.au/national-register>

ATTACHMENT A - Australian Catholic University Profile

Australian Catholic University (ACU) is a publicly funded Catholic university, open to people of all faiths and of none, and with teaching, learning and research inspired by 2,000 years of Catholic intellectual tradition.

ACU operates as a multi-jurisdictional university with eight campuses, across four states, one territory, and overseas. ACU campuses are located in North Sydney (NSW), Strathfield (NSW), Canberra (ACT), Melbourne (Victoria), Ballarat (Victoria), Brisbane (QLD), Adelaide (SA), and Rome (Italy).

ACU is the largest Catholic university in the English speaking world. Today, ACU has over 34,000 students and 2,000 staff.¹⁴

ACU graduates demonstrate high standards of professional excellence and are also socially responsible, highly employable and committed to active and responsive learning.

ACU has built its reputation in the areas of Health and Education. ACU produces more nursing and teaching graduates than any other university in Australia, serving to meet significant workforce needs in these areas.¹⁵

ACU has four faculties: Health Sciences; Education and Arts; Law and Business; and Theology and Philosophy. This consolidation of ACU's previous six faculties in 2014 has created a more efficient and competitive structure focused on the needs of industry and employment partners. ACU has also moved towards the adoption of a shared services model where suitable, to improve efficiencies, internal processes and better allocate resources.

ACU is committed to targeted and quality research. ACU's strategic plan focuses on areas that align with ACU's mission and reflect most of its learning and teaching: Education; Health and Wellbeing; Theology and Philosophy; and Social Justice and the Common Good. To underpin its research intensification efforts, ACU has appointed high profile leaders to assume the directorships, and work with high calibre members, in its research institutes.¹⁶

In recent years the quality of ACU's research has improved dramatically. In the 2015 Excellence in Research for Australia (ERA) assessment ACU received high scores in the fields of research identified as strategic priorities and in which it has concentrated investment in order to achieve the highest levels of excellence. These include selected areas of Health, as well as Education, Psychology, Theology, and Philosophy.

ACU's research in Psychology, Human Movement and Sports Science, Nursing, Public Health and Health Services is rated in the top category under ERA of being "well above world standard". ACU's research in Specialist Studies in Education, Philosophy, and Religion and Religious Studies is in the next ERA category as being above world standard, while ACU's research in Education Studies in Human Society, Law and Legal Studies, History and Archaeology Education Systems, Curriculum and Pedagogy, Business and Management, Political Science, Sociology, Law, Applied Ethics and Historical Studies is at world standard.

¹⁴ Student numbers refer to headcount figures while staff numbers refer to full-time equivalent (FTE).

¹⁵ Department of Education and Training, '2017 Special Courses' in *Selected Higher Education Statistics – 2017 Student Data* (2018). Accessible via <https://www.education.gov.au/selected-higher-education-statistics-2017-student-data>.

¹⁶ See Australian Catholic University, 'Research at ACU' via <http://www.acu.edu.au/>.