

Review of the Higher Education Provider Category Standards

Submission from the Australian Film, Television and Radio School

Issued by: Neil Peplow, Chief Executive Officer

Nell Greenwood, Director of Curriculum & Student Registrar

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Introduction

The Australian Film, Television and Radio School (AFTRS) welcomes the opportunity to provide feedback on the Review of the Higher Education Provider Category Standards (PCS).

AFTRS strongly supports a change to the PCS.

AFTRS was established by the Australian Film Television Act 1973 (AFTRS Act 1973) for the principal purpose of providing higher education to the screen arts and broadcast sector. It has a proud history of providing this education to the screen arts and broadcasting sector over 40 years. Its history, its graduates, its staff and its culture are integral to this achievement.

All responses to the discussion questions in this submission are in the context of AFTRS' classification of being within the current 'Higher Education Provider' category.

Of the 12 self-accrediting authorities (SAA) within this category, AFTRS is only 1 of 3 who have been granted full self-accrediting status.

Discussion Questions

The following are responses to the discussion questions posed in the discussion paper:

1. What characteristics should define a 'higher education provider' and a 'university' in the PCS?

Although AFTRS is not a university, we acknowledge the historical context and established norm of what a university is, how it assists Australia's strong standing on the global stage and the way in which it secures the nation's international image.

In saying that, the characteristics of Provider Categories should inherently represent Australia's interest first and foremost.

AFTRS would like to see a set of characteristics built around the student educational experience, informed by provider quality of education.

Indeed, many students enrol at AFTRS because we are *not* a university. Similarly to other country's national film schools, we are accountable to federal parliament through the Minister for the Arts, funded by the Department of Communications and the Arts, and are therefore viewed as primarily a cultural organisation.

AFTRS' unique position allows us to follow an intensive, practice-based teaching and learning model, based on small class-sizes and closely aligned to work patterns and expectations of the screen and broadcast industries. Students see smaller student cohorts as an advantage, particularly in the areas of increased student to staff ratios, a more personalised service for student support and smaller, yet tighter and more highly functional networks of peers in the classroom.

In 2018, AFTRS eligible completion rate was 92%¹. We primarily attribute this to those aspects above and would like to see a PCS that reflects the *quality* of the student experience rather than the *quantity* of fields of study or number of AQF levels of its course of study offerings.

Any change to both the name and the characteristics of the 'Higher Education Provider' category should strongly reflect the unique nature that these providers play in the higher education landscape.

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

As stated in the discussion paper, the 'Higher Education Provider' category is the most heavily weighted category with a total number of 127 providers. Having such a large variability of providers within this single category suggests that the PCS structure has not kept up with the pace of change in the higher education landscape and has therefore not been able to retain its original purpose to provide effective categorisation by its very nature.

Out of the 6 provider categories in the Threshold Standards, 5 include the word 'university'. The sole 'Higher Education Provider' category seems to be a catch-all for all other providers that don't fit the university mould. AFTRS would like to see additional categories created to represent the varied uniqueness and associated attributes that represent the sector as a whole.

In whatever way the university-based categories are reviewed, equal representation should be applied to the higher education provider-based categories. E.g. If an 'Australian University of Specialisation' category is to still exist, an 'Australian Higher Education Provider of Specialisation' (or similar nomenclature) should also exist.

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

4. Do specific categories need to be revised? How?

¹ Source: 2017-2018 AFTRS Annual Report

Over recent years, those providers within the existing ‘Higher Education Provider’ category have noticed an increase in colloquial referencing to the category as ‘private’ or ‘non-university’ higher education providers.

This by its very nature alludes a negative tone to suggest that the ‘university’ title is to be the one title to which all are measured against and any provider that is not a university is somehow of lesser value.

Some have commenced using the term ‘*independent* higher education provider’, which AFTRS supports.

Tiered Independent HEP Categories

AFTRS would like to see the existing ‘Higher Education Provider’ category revised and extra categories created based on the progressive nature of provider standing. This may look similar to:

- Independent HEP – Probationary
- Independent HEP – Non-SAA
- Independent HEP - SAA

The discussion paper briefly mentions ‘greenfield’ universities as having existed within earlier National Protocols to facilitate entities to operate provisionally until their registration is formally granted. Rather than being allowed to operate on a provisional basis, AFTRS would prefer to see newly registered providers operate at a *probationary* level, but as a fully approved provider with full accountability against the Threshold Standards.

In a similar context to new employees into an organisation, probationary providers should be tasked with greater regulatory scrutiny over an initial period of time and once their operational compliance has been proven, only then should they be transferred to the next tiered category.

Rather than being seen as strictly punitive in nature, a probationary HEP would be intrinsically guided by TEQSA to achieve best practice outcomes.

Additionally, AFTRS would like to see extra independent HEP categories based on whether or not a provider has self-accrediting authority (SAA) status.

As mentioned, AFTRS is a fully self-accrediting authority and has been so for a number of years. In late 2018, the organisation received a 3-year extension to its registration period from TEQSA due to AFTRS “... *established track record of low-risk, high quality delivery of higher education...*”². Yet, the strong standing of AFTRS as a provider of high quality and high governance is lost by its inclusion in the current, all-encompassing ‘Higher Education Provider’ category, which AFTRS shares with new providers and existing non self-accrediting providers alike.

Tiered University HEP Categories

² TEQSA Registration Extension Decision 21 November 2018

As mentioned previously, AFTRS acknowledges the context of a university in the Australian higher education landscape. We see value in retaining in existing university categories and recognise the existing stringent requirements in order to meet these categories, although an additional probationary university category should be added for newly registered universities.

One thing that has always seemed unusual in the current PCS is that a category called 'Higher Education Provider' exists when a university itself is also technically a *provider of higher education*. AFTRS recommends a slight renaming of the existing university category to something similar to the following:

- University HEP - Probationary
- University HEP

In regards to the existing 'Australian University College' and 'Australian University of Specialisation' categories, it is clear that with the current number of providers in these categories being 0 and 1 respectively, the original intent of these categories has not been taken up by the sector and therefore should be retired. Whether a provider is specialist or generalised in its course offerings should not be the reason for PCS categorisation; its level of academic quality and student experience should be the primary driving factor for success.

In regards to the current 'Overseas University' and 'Overseas University of Specialisation' categories, AFTRS sees little value in having these as separate categories given there has, again, been little take-up of these categories to date. As the requirements to achieve these categories are essentially the same as their Australian university category counterparts, the merging of these categories would seem appropriate. If this were to be conducted, an additional element within the category could be created to flag whether the provider is a domestic or overseas university.

However, if the overseas university categories were to remain, AFTRS would see value in also having overseas categories in the independent HEP stream also represented.

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

A categorisation in terms of progression of provider standing would allow TEQSA and other associated regulators to more deeply concentrate their efforts on those providers new to the sector to ensure that best practice of quality and governance is being achieved. The more effort put in by all parties involved initially will lead to a stronger and more robust sector as these providers mature.

It also allows for more established providers who are already deeply engaged in the sector to have minimal involvement with regulators so long as the existing Threshold Standards are continuing to be met.

Students, as well as that of industry, will have the surety that although a provider may be new and in a probationary style category, a minimum standard of compliance will have already been met for inclusion into that category and confidence can be gained by knowing that regulators will be closely scrutinising those provider's decisions and actions.

Within the independent HEP stream, a categorisation in terms of provider standing will give these providers greater aspirations to attempt to achieve greater autonomy and full self-accrediting authority status.

